The County of San Diego

Planning Commission Hearing Report

Date:	October 14, 2016	**Case/File No.:**	Forest Conservation Initiative Lands GPA; GPA 12-004; 3800 12-004
Place:	County Conference Center 5520 Overland Avenue San Diego, CA 92123	**Project:**	Forest Conservation Initiative (FCI) Lands General Plan Amendment
Time:	9:00 a.m.	**Location:**	Districts All
Agenda Item:	#4	**General Plan:**	Various
Appeal Status:	Board of Supervisors is the final decision-maker	**Zoning:**	Various
Applicant/Owner:	County of San Diego	**Community:**	Alpine, Central Mountain, Desert, Jamul/Dulzura, Julian, Mountain Empire, North Mountain, Pendleton-DeLuz, Ramona
Environmental:	Supplemental EIR	**APNs:**	Various

A. EXECUTIVE SUMMARY

1. Requested Actions

This is a request for the Planning Commission (Commission) to consider a recirculated Draft Final Supplemental Environmental Impact Report (SEIR) for the Forest Conservation Initiative (FCI) Lands General Plan Amendment (GPA) (Attachment C) and for the Commission to consider additional staff recommended changes to the project.

The Commission previously made recommendations to the Board of Supervisors (Board) on the FCI GPA on October 18, 2013 (1) and November 15, 2013 (1). The Board reviewed the Commission's recommendations on June 24, 2014 (1) and provided additional direction to staff.

It is requested that the Commission evaluate additional staff recommendations associated with the land use designations directed by the Board of Supervisors (Board) on June 25, 2014 (1). If the required findings can be made, the Planning & Development Services Department (PDS) recommends that the Commission take the following actions:

a. Find that it has reviewed and considered the information contained in the Final Program Environmental Impact Report (EIR), dated August 3, 2011 on file with PDS as Environmental Review Number 02-ZA-001, and the Draft Final SEIR, dated October 2016 and on file with PDS as GPA 12-004, prior to making additional recommendations on the FCI GPA.

b. Recommend that the Board adopt the attached Form of Ordinance for the proposed zoning changes:

AN ORDINANCE CHANGING THE ZONING CLASSIFICATION OF CERTAIN PROPERTY WITHIN THE COUNTY OF SAN DIEGO RELATED TO THE FOREST CONSERVATION INITIATIVE LANDS GENERAL PLAN AMENDMENT [GPA 12-004] (Attachment A)

c. Recommend that the Board adopt a change to the North Mountain Sub-regional Plan for consistency with proposed zoning changes.

2. Key Requirements for Requested Actions

a. Does the project comply with the California Environmental Quality Act (CEQA)?

b. Are the additional project changes consistent with the vision, goals, and polices of the General Plan?

B. BACKGROUND

1. FCI Approval

San Diego County voters approved the FCI in 1992, establishing 40-acre minimum lot sizes on private lands within the Cleveland National Forest (CNF). The FCI expired at the end of 2010 but, due to timing, the FCI lands were not included in the County's 2011 General Plan Update. When the FCI expired, FCI lands reverted to the land use designations that were in place prior to the 2011 General Plan Update. In many instances, the land use designations were no longer consistent with the updated General Plan polices and planning principles.

2. FCI GPA Description

On December 8, 2010 (8), the Board directed staff to prepare a GPA in order to update land use designations for FCI lands to be consistent with the vision goals and policies of the current General Plan and applicable community and sub-regional plans. The GPA covered approximately 72,000 acres, as well as approximately 400 acres of associated adjacent parcels to ensure the land use designations are consistent with the changes proposed for adjacent FCI lands. The project also included changes to the Land Use Element, Mobility Element, and community and sub-regional plans, and zoning designations for consistency with proposed land use designations, as well as the removal of the FCI appendix from the General Plan.

3. Environmental Review

A Program EIR (PEIR) for the General Plan Update was certified on August 3, 2011. A Draft Supplemental Environmental Impact Report (SEIR) to the General Plan Update PEIR was prepared for the FCI GPA. While the General Plan Update PEIR considered the impacts of applying General Plan goals and policies countywide, it did not evaluate updated land use designations on FCI lands. The Draft SEIR focused on the impacts of assigning land use designations on FCI lands. A Notice of Preparation (NOP) was issued August 30, 2012, soliciting

input on the scope of the SEIR and 12 comment letters were received. The Draft SEIR was circulated for public review from February 1 to March 18, 2013, with 41 comments received.

4. Planning Commission Recommendations

On October 18, 2013 (1) and November 15, 2013 (1), the Commission considered the Draft SEIR and staff recommendations for land use designations, zoning revisions, community and sub-regional plan revisions, applicable Land Use and Mobility Element changes and removal of the FCI Appendix from the General Plan. The Commission accepted staff's recommendations except for certain modifications to the land use map designations within the communities of Alpine, Cuyamaca, Lake Morena, North Mountain, Palomar Mountain and Pendleton-De Luz. The October 18, 2013 (1) Planning Commission report, including Attachment B, is provided in Attachment F of this report. Additional information is also available at: http://www.sandiegocounty.gov/content/sdc/pds/advance/2013pc-rpt.html

5. Board Direction

On June 25, 2014 (1), the Board provided direction to staff in order to finalize the proposed land use designations for the GPA and to prepare final environmental documents. The land use designations that the Board directed staff to utilize reflected the Commission's recommended designations, except for certain properties in North Mountain, Campo/Lake Morena, Alpine, and Descanso. Additional information is also available at: http://www.sandiegocounty.gov/content/sdc/pds/advance/2014bos-rpt.html. The Board also directed staff to develop a scope of work for a special study in Alpine to determine the feasibility of developing needed infrastructure for potential land use designations in order to more thoroughly evaluate different land use options for Alpine.

6. Recommended Project

Staff prepared Recommended Project land use maps based on the June 25, 2014(1) direction from the Board. For areas where the Board did not endorse any land use designations, the Recommended Project assigned land use designations recommended by the Commission, except for Alpine. Within Alpine, the Recommended Project land use maps primarily reflected existing land use densities, except for a Village connection to the Village Core Mixed Use area, north of Interstate 8. The Recommended Project land use maps are shown at the end of Volume III of the Draft Final SEIR (Attachment C-3).

C. PROPOSED PROJECT CHANGES

After the Board hearing on June 25, 2014 (1), it was determined that additional project changes would be required for consistency with the Recommended Project land use map. Staff has determined that additional Commission review and recommendations for these changes will be needed prior to returning to the Board. Furthermore, the Commission will need to consider the recirculated Draft Final Supplemental Environmental Impact Report (SEIR) when evaluating this information and project changes that were not previously considered by the Commission. The additional project changes are summarized below.

1. North Mountain Sub-Regional Plan

A modification to the North Mountain Sub-regional Plan is proposed for consistency with the Recommended Project land use map:

Commercial Policy 1: Limit new commercial areas to sites within the Rural Village boundaries, except highway-related uses. (see sub-regional plan page 11)

2. Zoning Consistency

Changes to zoning are proposed for consistency with the Recommended Project land use map in the Alpine Community Planning Area (CPA), Descanso Sub-regional Plan Area and North Mountain Sub-region. Attachment A is the Zoning Ordinance amendment from the October 2013 Planning Commission hearing report; with revisions for consistency with the Recommended Project shown in the track changes mode. The new changes, which are all located in the Alpine CPA, include:

a. Residential-Commercial Use Regulation for a 4.2-acre parcel (APN 404-073-09-00) in the Alpine CPA along Willows Road, west of the Viejas Casino [see Map 1].
b. A density of 14.5 dwelling units per acre for the 152-acre area east of the Viejas Casino in response to the Village Core Mixed Use land use designation [see Map 4].
c. A change in minimum lot size from 40 to eight acres for five parcels north of Japatul Valley Road [see Map 7].
d. A change to a one-acre minimum lot size for the 100-foot wide portion of a 51.4 acre parcel (APN 404-240-15-00) to provide a transition between a 6,000 square foot minimum lot size area to the west and a lower density area of one dwelling unit per four acres to the east [see Map 7]. In addition the Building Type and Setback for this portion of the parcel would remain the same as the existing and not change as would the remainder of the parcel.

D. DRAFT FINAL SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT (SEIR)

1. Recirculated Draft SEIR

The October 2013 Draft SEIR to the General Plan Update (GPU) Program EIR has been revised and recirculated for public review. The January 2016 Draft SEIR, recirculated from January 14 through February 29, 2016, includes the following revisions:

a. Revised Greenhouse Gas (GHG)/Global Climate Change technical study and analysis that does not rely on the County Climate Action Plan (CAP). In April 2013, the San Diego County Superior Court set aside the approval of the CAP. In October 2014, the Fourth District Court of Appeal affirmed this decision. In April 2015, the Board rescinded the CAP.
b. A revised proposed Project and three (3) new Project alternatives were prepared in response to land use designations endorsed by the Board in 2014 and comments received on the Draft SEIR circulated for a 45-day public review on February 1, 2013. The new alternatives are briefly described below.

    i. Proposed Project – This alternative uses the land use designations endorsed by the Board on June 25, 2014. The Proposed Project is similar to the 2013 Commission recommendations; however, in areas where land use designations were not endorsed

by the Board, the Proposed Project land use designations reflect recommendations of the Alpine CPG, which are more intensive than designations recommendation of the Commission.

ii. Mid-density – The staff recommended land use designations considered by the Commission in October and November 2013.

iii. Modified FCI Condition – This is the environmentally superior alternative and was formulated in response to comments received when the SEIR was circulated for public review in 2013.

iv. Alpine Alternative Land Use Map – The Recommended Project discussed above.

During the 45-day public review 29 comment letters were received and are available in Attachment C-2, Volume II of the Draft Final SEIR.

2. Draft Final Environmental Documents

Draft final environmental documents include the Draft Final SEIR (Attachment C), which is presented in three volumes as discussed below, and Summary of Findings (Attachment D).

a. Volume I is the January 2016 Draft SEIR. Revisions to Chapters 1 through 7 are shown in strikeout-underline based on the public comments received as well as staff-initiated changes (Attachment C-1). These revisions do not alter the conclusions of the environmental analysis. Furthermore, they do not result in the identification of new significant environmental impacts nor do they constitute significant new information.
b. Volume II is a summary of the changes shown in Volume I. This Volume also includes the comment letters and responses to comments (Attachment C-2).
c. Volume III provides a description and land use maps for the Recommended Project (Attachment C-3).

E. ANALYSIS AND DISCUSSION

The following analysis and discussion is focused on the proposed project changes and the Draft Final SEIR. Additional information regarding the development of the Alpine Special Study can be found in the public comments and Community Planning Group recommendations of the staff report.

1. General Plan, Sub-Regional Plan and Community Plan Consistency

Staff reviewed the additional changes to the GPA proposed since the 2013 Commission hearings, and the General Plan consistency review analysis included in the 2013 staff report to the Commission. There are no changes proposed in the GPA that would be inconsistent with the General Plan planning principles, goals and policies.

Staff also reviewed applicable community and sub-regional plan policies and added a change to the North Mountain Sub-regional Plan shown for consistency with the Recommended Project land use map. Staff recommends approval of the North Mountain Sub-Regional Plan policy change to be consistent with the Rural Commercial land use designation proposed with the GPA.

2. Zoning Ordinance Consistency

The GPA proposes additional use regulations and minimum lot size changes for consistency with the land use map changes of the Recommended Project, when compared to the land use map

recommended in 2013. These zoning changes have been reviewed and are also consistent with the Compatibility Matrix in Zoning Ordinance Section 2050 and the General Plan. Staff recommends approval of the Ordinance for the proposed zoning changes.

3. CEQA Compliance

The Draft Final Findings have determined that significant impacts will occur under the same SEIR topic areas that were identified in the 2013 Draft SEIR, with the addition of the Global Climate Change topic area (Attachment D). Furthermore, the Global Climate Change topic area is the only topic where significant impacts have been identified for this GPA, but were not identified as significant impacts in the GPU Program EIR. The GPU policies and mitigation measures incorporated into the GPA would reduce impacts, but not to below a level of significance. It is recommended that the Commission find that it has reviewed and considered the information contained in the Final Program Environmental Impact Report (EIR), dated August 3, 2011 on file with PDS as Environmental Review Number 02-ZA-001, and the Draft Final SEIR, dated October 2016 and on file with PDS as GPA 12-004, prior to making its recommendation on the GPA and zoning changes.

F. PUBLIC COMMENTS

1. FCI Expiration

Several public comment letters on the Draft Final SEIR dispute that the FCI lands reverted to the previous General Plan land use designations after the FCI expired. However, the initiative adopting the FCI stated that it was to remain in effect until December 31, 2010. Each provision of the FCI that amended the General Plan stated that it was operative "through December 31, 2010" or that it remained "in effect through December 31, 2010." Therefore, upon expiration of the FCI, the lands subject to the FCI reverted back to the previous land use designations found within the General Plan in effect at the time the FCI was enacted by voter initiative; the General Plan adopted by the County in 2011 does not apply to the FCI Lands.

The primary objective of the current GPA is to reclassify former FCI lands to be consistent with goals, policies and guiding principles of the 2011 County General Plan. Moreover, the land use density of one dwelling unit per 40 acres, applied by the FCI, was reviewed in the Draft SEIR as a potential alternative (FCI Density Alternative). However, this alternative was rejected as infeasible because an arbitrarily assigned density of one dwelling unit per 40 acres is inconsistent with the General Plan Guiding Principles and Land Use Goals and Policies, including the Community Development Model.

2. Delay Project Consideration until a CAP is Adopted

In October 2014, the Fourth District Court of Appeal found that the County CAP did not comply with the express language of Mitigation Measure CC-1.2 from the General Plan Update PEIR. In April 2015, the Board of Supervisors rescinded the CAP. Some comment letters asserted that the County should postpone consideration of the FCI Lands GPA until adoption of a revised CAP. A CAP is not required for the County to process this GPA or other discretionary or ministerial project applications, nor does the absence of a CAP, by itself, prevent feasible mitigation of greenhouse gas emissions by these projects. There is no law, policy or practice that precludes consideration of this GPA by the Board of Supervisors in the absence of a CAP.

3. Alpine Special Study

In accordance with the Board direction on June 25, 2014 (1), staff prepared a draft scope of work for a special study in Alpine. The study would provide a rough estimate of the cost to expand infrastructure into the study area and determine the appropriate General Plan land use designations that could fund the expansion of the infrastructure.

A comprehensive update to the Alpine CP, included in the Advance Planning FY 2017-18 work program, will be evaluating and planning for changes in the community. Staff recommends including the special study scope of work, prepared in response to the Board's June 2014 direction, within the scope of work for this CP update, to provide comprehensive examination of community needs. Staff further believes that the combination of these efforts will result in an integrated approach to planning for the overall community. The Alpine CP update would include the appropriate CEQA analysis to incorporate any land use changes that evolve through the planning process, with particular emphasis on the area of eastern Alpine initially intended by the special study.

G. COMMUNITY PLANNING GROUP RECOMMENDATIONS

1. Alpine Special Study

a. On August 28, 2014, by a vote of 10 ayes; 1 nay; 2 absent; 0 abstentions; 2 vacant, the Alpine CPG recommend changes to the boundary proposed by staff and further recommended that the scope of work go beyond this boundary and also study the impacts on adjacent CNF lands.
b. On September 24, 2015, by a vote of 12 ayes; 0 nays; 3 absent; 0 abstentions; 0 vacant, the CPG recommended expanding the boundary to include the area east of Viejas north of Interstate 8 and, by a vote of 10 ayes; 2 nays; 3 absent; 0 abstentions; 0 vacant, recommended approval of the draft scope of work as presented, and recommended the land use plan developed through the study determine an appropriate land use density necessary to make the development of the infrastructure needed throughout the area economically feasible and not limited by any of the previously developed land use plans for this area.
c. On September 22, 2016, by a vote of 13 ayes; 0 nays; 2 absent; 0 abstentions; 0 vacant, the CPG recommended that the infrastructure study (Alpine Special Study) be incorporated into an Alpine CP update.

2. Zoning Changes

a. On December 10, 2014, by votes of 8 ayes; 0 nays; 5 absent; 0 abstentions; 2 vacant, the Alpine CPG voted to recommend approval of the preliminary zoning changes.
b. On September 22, 2016, by votes of 13 ayes; 0 nays; 2 absent; 0 abstentions; 0 vacant, the Alpine CPG voted to recommend approval of the staff recommended zoning changes, with the exception of 16 parcels (1,362 acres) in the Japatul Valley area of the Alpine CPA where the CPG recommended an 8-acre minimum lot size zoning classification and Rural Lands 20 General Plan designation in lieu of the 40-acre minimum lot size and Rural Lands 40 designation recommended by staff.

H. OUTREACH AND PUBLIC INPUT

Changes to an adopted General Plan must follow the process specified in Government Code Section 65350, which includes evaluation and analysis, public and agency review, Commission review, and Board approval. In addition to the Alpine CPG meetings, public outreach was identified in the October 18, 2013 Commission staff report.

On January 8, 2016, applicable Tribal governments in the San Diego region were notified of the recirculation of the Draft SEIR and PDS inquired whether they desired an AB-52 consultation. Correspondence was received from two Tribal governments requesting a consultation: (1) Rincon San Luiseno Band of Mission Indians (March 28, 2016 consultation) and (2) Viejas Band of Kumeyaay Indians — (February 1, 2016 consultation). There were not any unresolved issues resulting from these consultations. Meeting notes are provided as Attachment E.

I. RECOMMENDATIONS

Staff recommends that the Planning Commission:

1. Find that it has reviewed and considered the information contained in the Final Program EIR, dated August 3, 2011 on file with PDS as Environmental Review Number 02-ZA-001, and the Draft Final SEIR, dated October 2016 and on file with PDS as GPA 12-004, prior to making its recommendation on the GPA.
2. Recommend that the Board adopt the attached Form of Ordinance:

   AN ORDINANCE CHANGING THE ZONING CLASSIFICATION OF CERTAIN PROPERTY WITHIN THE COUNTY OF SAN DIEGO RELATED TO THE FOREST CONSERVATION INITIATIVE LANDS GENERAL PLAN AMENDMENT [GPA 12-004] (Attachment A)

3. Recommend that the Board adopt a change to the North Mountain Sub-regional Plan for consistency with proposed zoning changes.

Report Prepared By:	***Report Approved By:***
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AUTHORIZED REPRESENTATIVE: _____
MARK WARDLAW, DIRECTOR

ATTACHMENTS:

Attachment A – Zoning Ordinance Amendment (track changes – new changes since 2013)

Attachment B – Minute Order for June 25, 2014 (1) Board hearing

Attachment C – Draft Final Supplemental Environmental Impact Report

- C-1 – Volume I, Draft SEIR (Track-Changes Mode)
- C-2 – Volume II, Summary of Changes to Draft SEIR, Comment Letters, Responses to Comments
- C-3 – Volume III, Description of the Recommended Project

Attachment D – Draft Final Findings

- D-1 – Draft Decision and Explanation Regarding Recirculation
- D-2 – Draft CEQA Findings Regarding Significant Effects
- D-3 – Draft Statement of Overriding Considerations

Attachment E – SB-52 Consultation meeting notes

Attachment F – FCI Staff Report for October 18, 2013 (1) Planning Commission meeting

Attachment A

Form of Ordinance
Zoning Classification

October 2016

AN ORDINANCE CHANGING THE ZONING CLASSIFICATION OF CERTAIN PROPERTY WITHIN THE COUNTY OF SAN DIEGO RELATED TO THE FCI LANDS GENERAL PLAN AMENDMENT

Changes from the revisions considered at the October 18 and November 15, 2013 Planning Commission hearings are shown in track changes

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(Revisions from October 2013) Copy

ORDINANCE NO. _____ (NEW SERIES)

AN ORDINANCE CHANGING THE ZONING CLASSIFICATION OF CERTAIN PROPERTY WITHIN THE COUNTY OF SAN DIEGO RELATED TO THE FOREST CONSERVATION INITIATIVE (FCI) LANDS GENERAL PLAN AMENDMENT

The Board of Supervisors of the County of San Diego ordains as follows:

Section 1. The zoning classification of certain real property is hereby changed as set forth herein, and more precisely delineated on the FCI Lands Zoning Use Regulation Changes Maps identified as Maps (1) FCI-UR-Alpine, (2) FCI-UR-Descanso and (3) FCI-UR-North Mountain from the **TBD** Board of Supervisors hearing, all documents on file with the Clerk of the Board of Supervisors of the County of San Diego.

Use Regulation Changes

Sub-Area No.	Old	New
UR-1	A70	C40
UR-2	RC	C40
UR-3	S92	C40
UR-4	RR	C40
UR-5	A70	RV
UR-6	A70	C44
UR-7	A72	C44
UR-8	A70	C36
UR-9	A70	C34
UR-10	C38	C40
UR-11	C34	C40
UR-12	**A70**	**RC**

Section 2. The zoning classification of certain real property is hereby changed as set forth herein, and more precisely delineated on the FCI Lands Zoning Density Changes Maps identified as Maps (4) FCI-DN-Alpine, (5) FCI-DN-Descanso and (6) FCI-DN-North Mountain from the **TBD** Board of Supervisors hearing, all documents on file with the Clerk of the Board of Supervisors of the County of San Diego.

Density Changes

Sub-Area No.	Old	New
DN-1	5	0.25
DN-2	0.025	0.25
DN-3	—	0.25
DN-4	0.05	~~10.9~~ **14.5**
DN-5	—	~~10.9~~ **14.5**
DN-6	—	2
DN-7	0.5	2
DN-8	1	2

Section 3. The zoning classification of certain real property is hereby changed as set forth herein, and more precisely delineated on the FCI Lands Zoning Lot Size Changes Maps identified as Maps (7) FCI-LS-Alpine, (8) FCI-LS-Descanso and (9) FCI-LS-North Mountain from the **TBD** Board of Supervisors hearing, all documents on file with the Clerk of the Board of Supervisors of the County of San Diego.

Lot Size Changes

Sub-Area No.	Old	New
LS-1	8AC	—
LS-2	4AC	—
LS-3	40AC	—
LS-4	40AC	8AC
LS-5	0.5AC	6,000 SF
LS-6	8AC	6,000 SF
LS-7	4AC	0.5AC
LS-8	8AC	0.5AC
LS-9	40AC	0.5AC
LS-10	8AC	4AC
LS-11	40AC	~~8~~ 4AC
LS-12	4~~0~~AC	~~4~~ 2AC
LS-13	20AC	8AC
LS-14	8AC	1AC
~~LS-15~~	~~4AC~~	~~2AC~~

Section 4. The zoning classification of certain real property is hereby changed as set forth herein, and more precisely delineated on the FCI Lands Building Type Changes Map identified as Maps (10) FCI-BT-Alpine and (11) FCI-BT-North Mountain from the **TBD** Board of Supervisors hearing, all documents on file with the Clerk of the Board of Supervisors of the County of San Diego.

Building Type Changes

Sub-Area No.	Old	New
BT-1	C	L
BT-2	C	K
BT-3	W	L

Section 5. The zoning classification of certain real property is hereby changed as set forth herein, and more precisely delineated on the FCI Lands Setback Changes Map identified as Map (12) FCI-SB1-Alpine from the **TBD** Board of Supervisors hearing, all documents on file with the Clerk of the Board of Supervisors of the County of San Diego.

Setback Changes

Sub-Area No.	Old	New
SB-1	C	O
SB-2	C	H
SB-3	—	O

Section 6. The zoning classification of certain real property is hereby changed as set forth herein, and more precisely delineated on the FCI Lands Special Area Regulation Changes Map identified as Map (13) FCI-SR-Alpine from the **TBD** Board of Supervisors hearing, all documents on file with the Clerk of the Board of Supervisors of the County of San Diego.

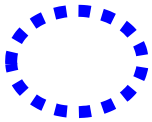
Special Area Regulation Changes

Sub-Area No.	**Old**	**New**
SR-1	—	B
SR-2	B, D2	B

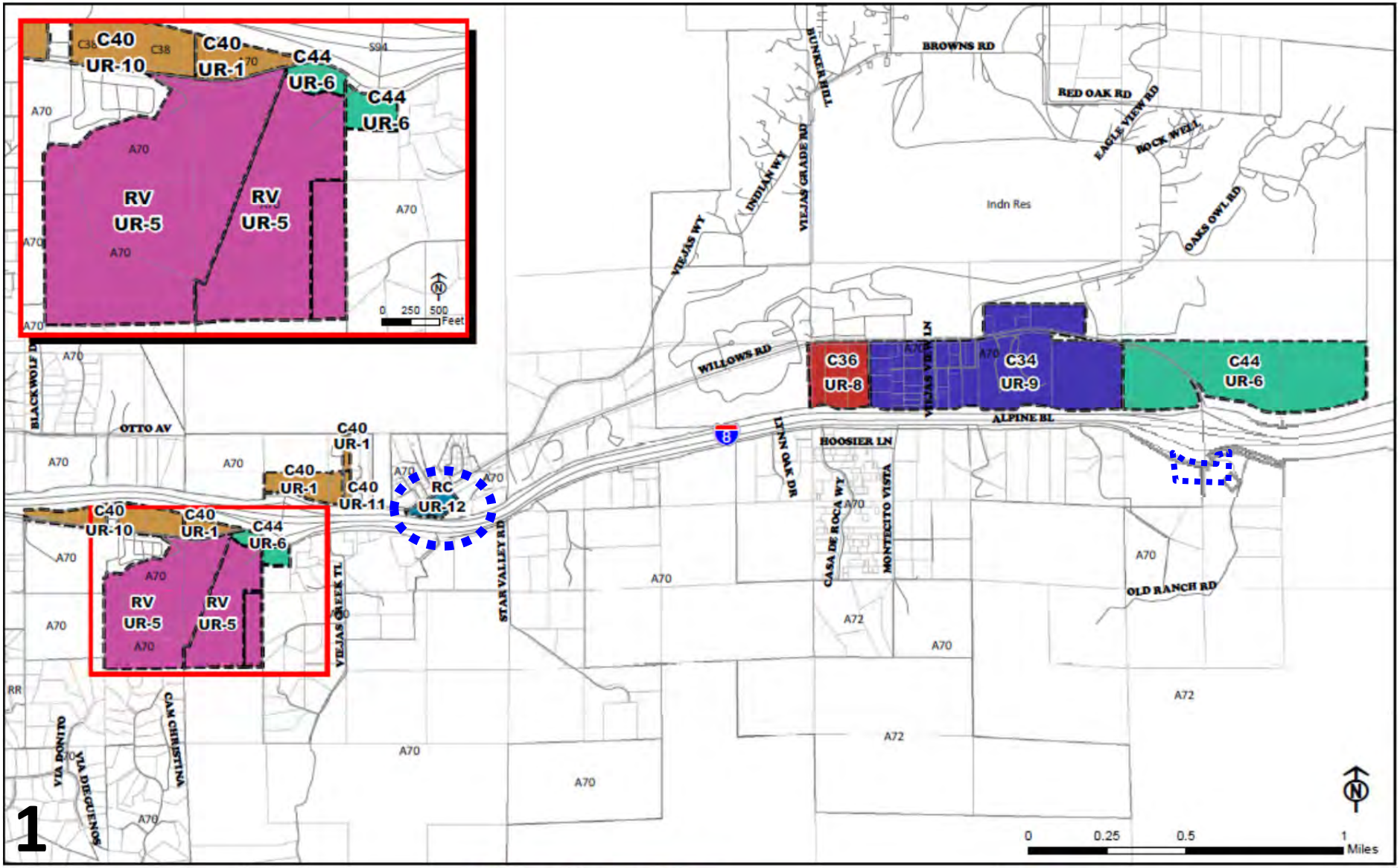
Section 7. Effective Date. This Ordinance shall take effect and be in force 30 days after the date of its passage, and before the expiration of 15 days after its passage, a summary shall be published once with the names of the members voting for and against the same in the _____, a newspaper of general circulation published in the County of San Diego.

ZONING MAPS

	MAP	TYPE OF ZONING REVISION
1	FCI-UR-ALPINE	USE REGULATIONS
2	FCI-UR-DESCANSO	
3	FCI-UR-NORTH MOUNTAIN	
4	FCI-DN-ALPINE	DENSITY
5	FCI-DN-DESCANSO	
6	FCI-DN-NORTH MOUNTAIN	
7	FCI-LS-ALPINE	MINIMUM LOT SIZE
8	FCI-LS-DESCANSO	
9	FCI-LS-NORTH MOUNTAIN	
10	FCI-BT-ALPINE	BUILDING TYPE
11	FCI-BT-NORTH MOUNTAIN	
12	FCI-SB-ALPINE	SETBACK
13	FCI-SR-ALPINE	SPECIAL AREA REGULATION



New zoning revisions since 2013 Planning Commission hearings



COUNTY OF SAN DIEGO

PROPOSED ZONING DESIGNATIONS
OCTOBER 2016

FCI-UR-ALPINE

FCI Zoning-Use Regulations

USE REG	FCI	OLD	NEW
C34	UR-1	A70	C40
C36	UR-5	A70	RV
C40	UR-6	A70	C44
C44	UR-8	A70	C36
RC	UR-9	A70	C34
RV	UR-10	C38	C40
	UR-11	C34	C40
	UR-12	A70	RC

County of San Diego
Planning and Development Services
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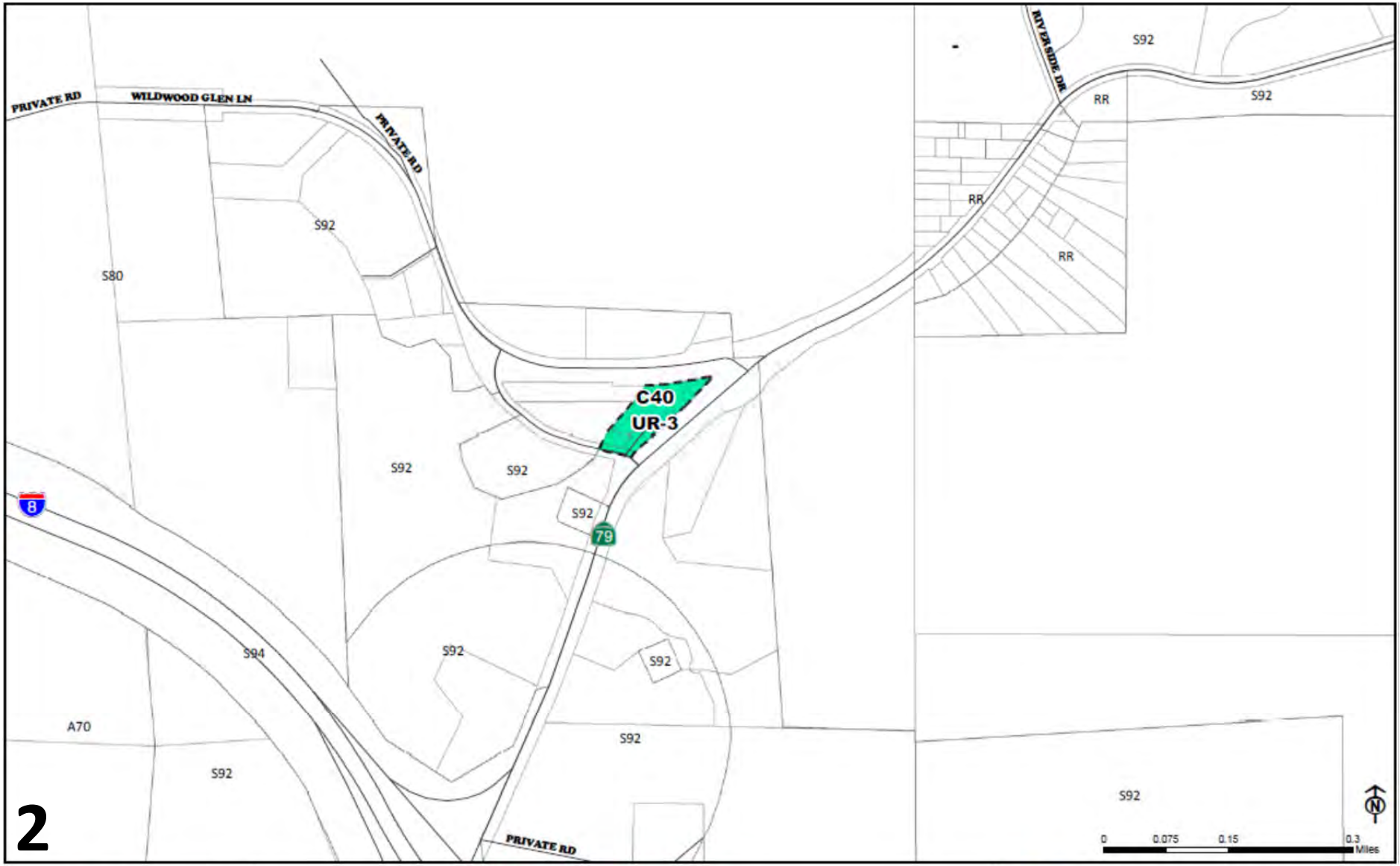
Regional Location Map



COUNTY OF SAN DIEGO

PROPOSED ZONING DESIGNATIONS
OCTOBER 2016

FCI-UR-Descanso

FCI Zoning-Use Regulations

USE REG	FCI	OLD	NEW
C40	UR-3	S92	C40

County of San Diego
Planning and Development Services
Land Use & Environmental Group
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Regional Location Map

COUNTY OF SAN DIEGO

PROPOSED ZONING DESIGNATIONS
OCTOBER 2016

FCI-UR-North Mountain

FCI Zoning- Use Regulations

USE REG	FCI	OLD	NEW
C40	UR-1	A70	C40
	UR-2	RC	C40
	UR-4	RR	C40

County of San Diego
Planning and Development Services
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Regional Location Map

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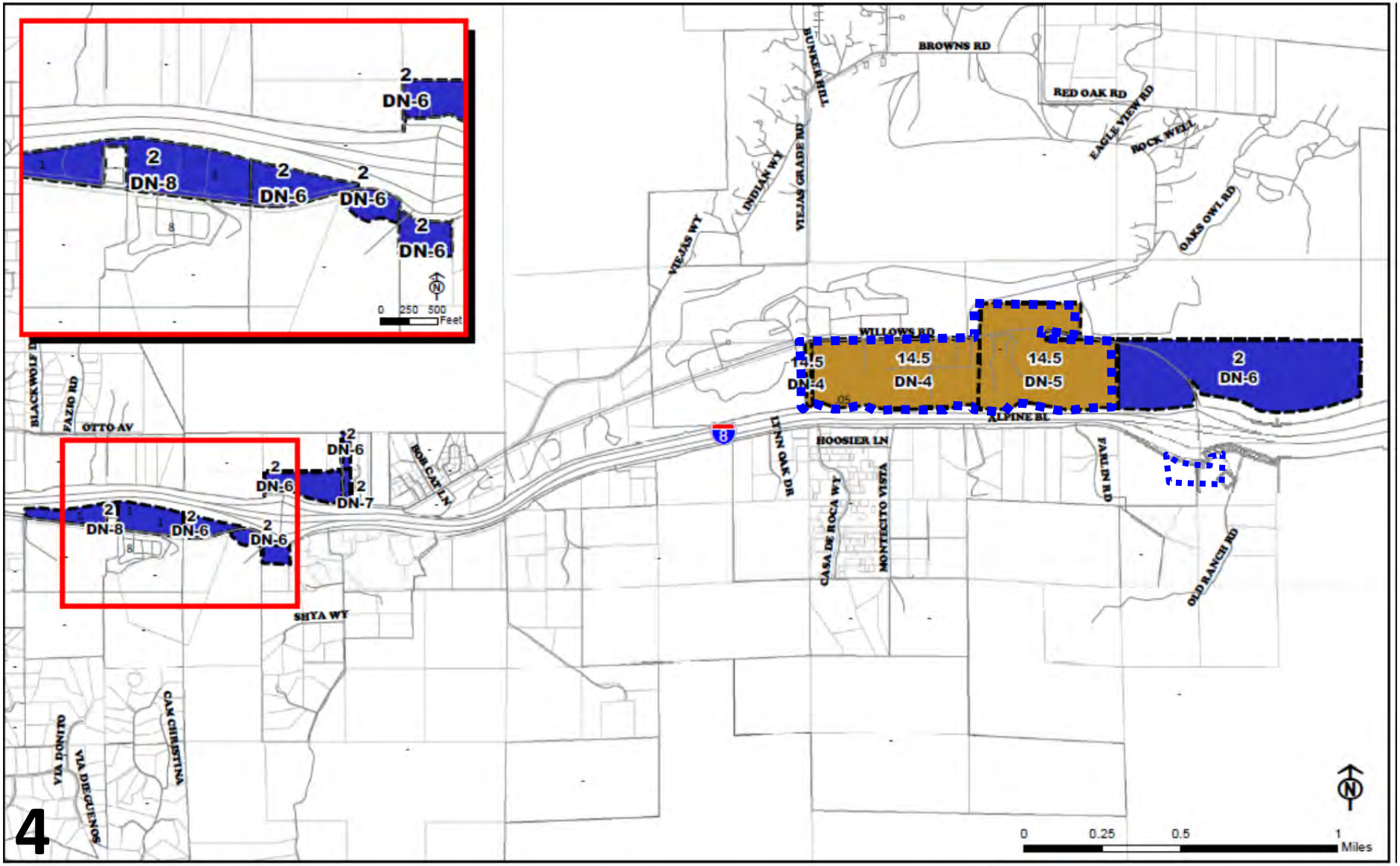

COUNTY OF SAN DIEGO

PROPOSED ZONING DESIGNATIONS
OCTOBER 2016

FCI-DN-ALPINE

FCI Zoning-Density

DENSITY	FCI	OLD	NEW
2	DN-4	0.5	14.5
14.5	DN-5	-	14.5
	DN-6	-	2
	DN-7	0.5	2
	DN-8	1	2

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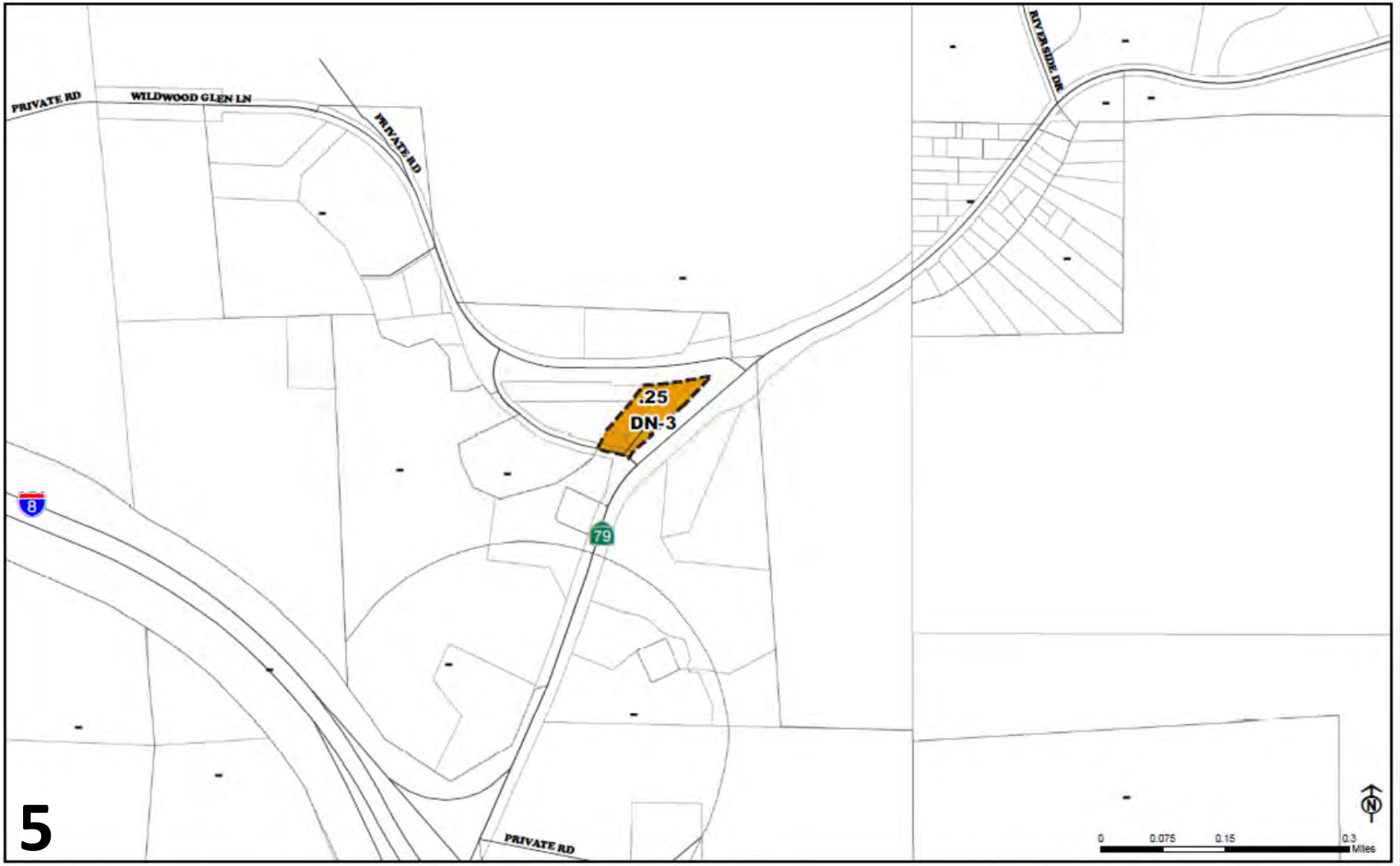

COUNTY OF SAN DIEGO

PROPOSED ZONING DESIGNATIONS
OCTOBER 2016

FCI-DN-DESCANSO

FCI Zoning Density

DENSITY	FCI	OLD	NEW
0.25	DN-3	-	0.25

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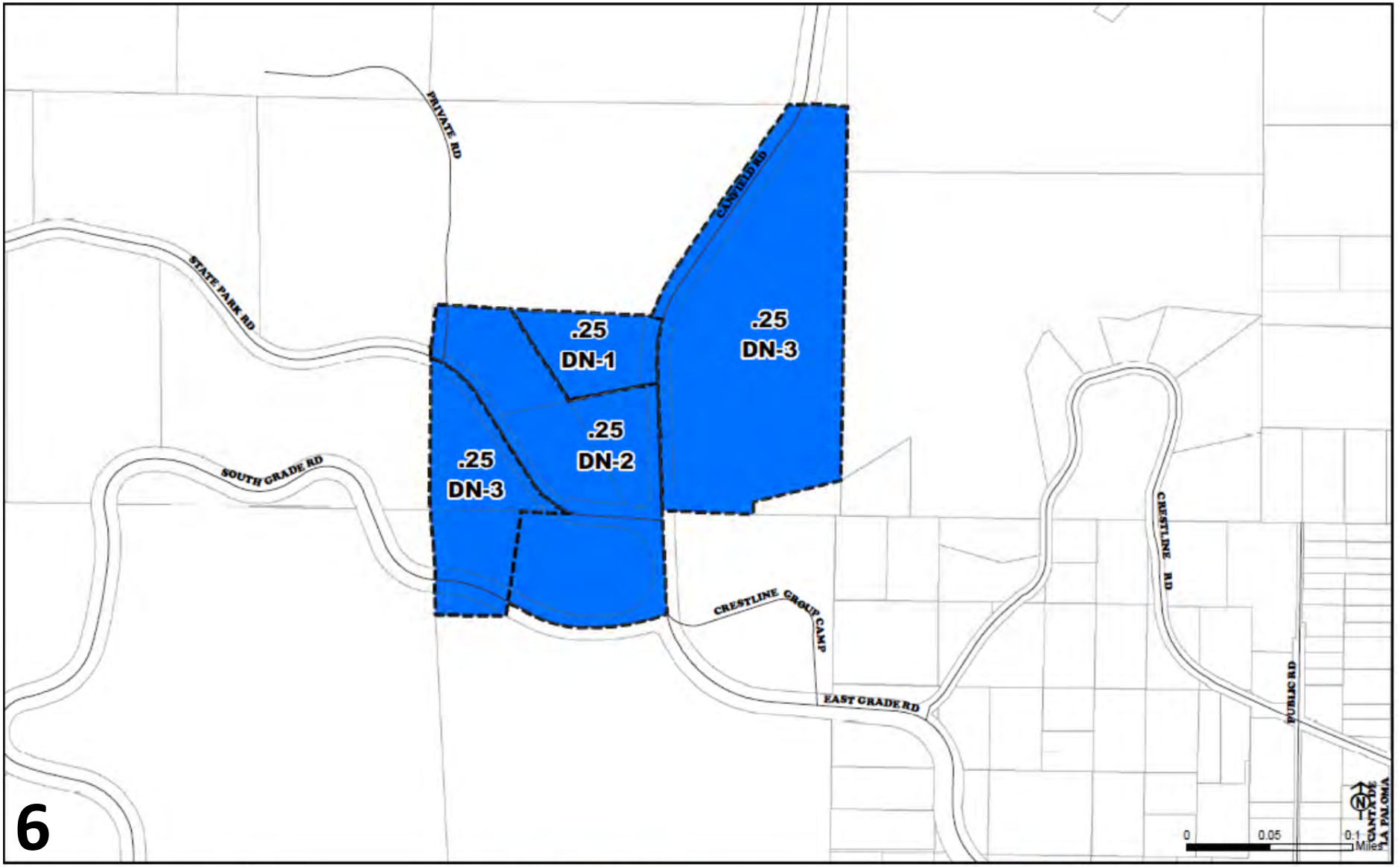

COUNTY OF SAN DIEGO

PROPOSED ZONING DESIGNATIONS
OCTOBER 2016

FCI-DN-NORTH MOUNTAIN

FCI Zoning- Density

DENSITY	FCI	OLD	NEW
.25	DN-1	5	.25
	DN-2	.025	.25
	DN-3	-	.25

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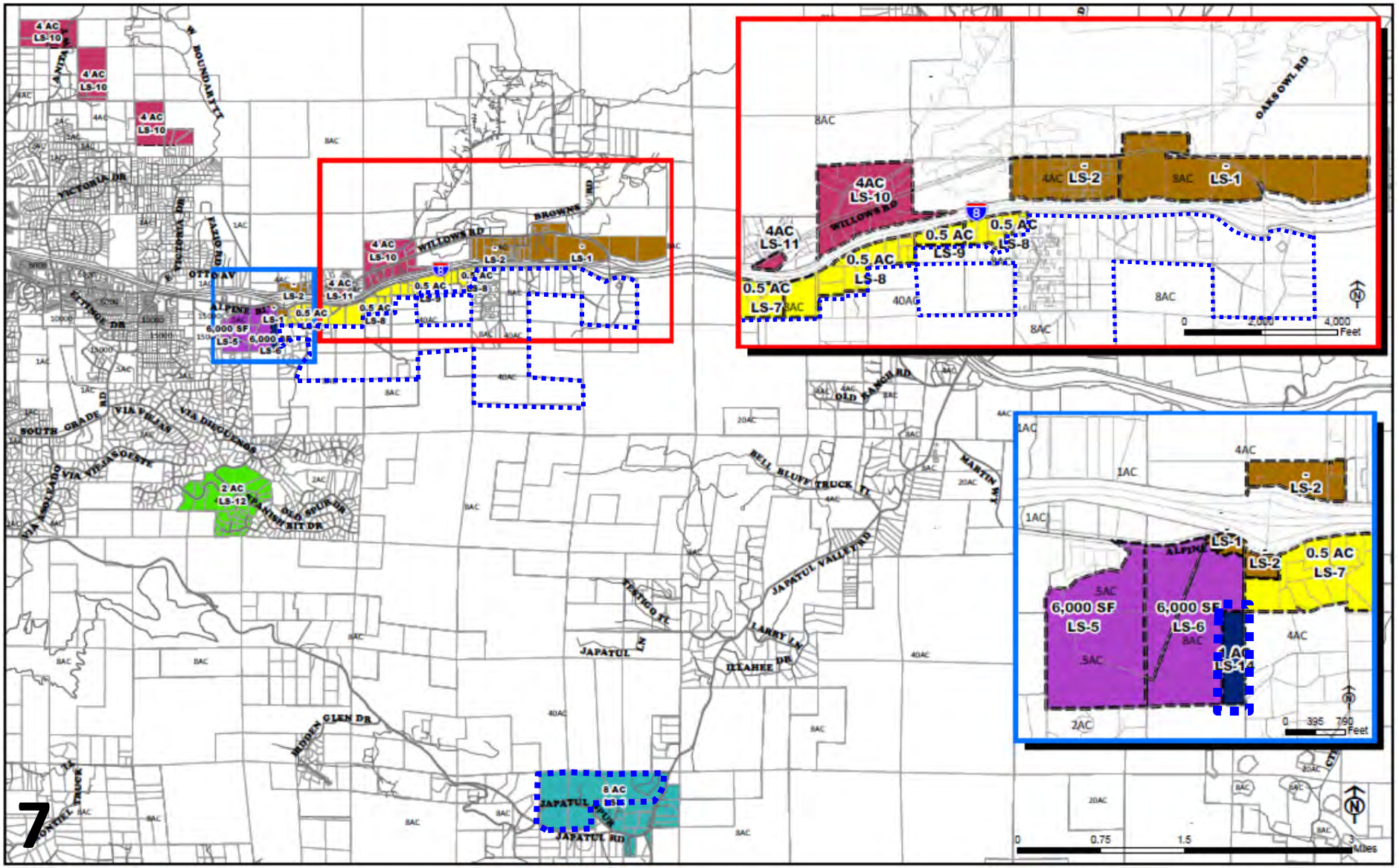

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COUNTY OF SAN DIEGO

PROPOSED ZONING DESIGNATIONS
OCTOBER 2016

FCI-LS-ALPINE

FCI Zoning-Lot Size

Lot Size	FCI	OLD	NEW
-	LS-1	8 AC	-
6,000 SF	LS-2	4 AC	-
0.5 AC	LS-4	40 AC	8 AC
1 AC	LS-5	0.5 AC	6,000 SF
2 AC	LS-6	8 AC	6,000 SF
4 AC	LS-7	4 AC	0.5 AC
8 AC	LS-8	8 AC	0.5 AC
	LS-9	40 AC	0.5 AC
	LS-10	8 AC	4 AC
	LS-11	40 AC	4 AC
	LS-12	4 AC	2 AC
	LS-14	8 AC	1 AC

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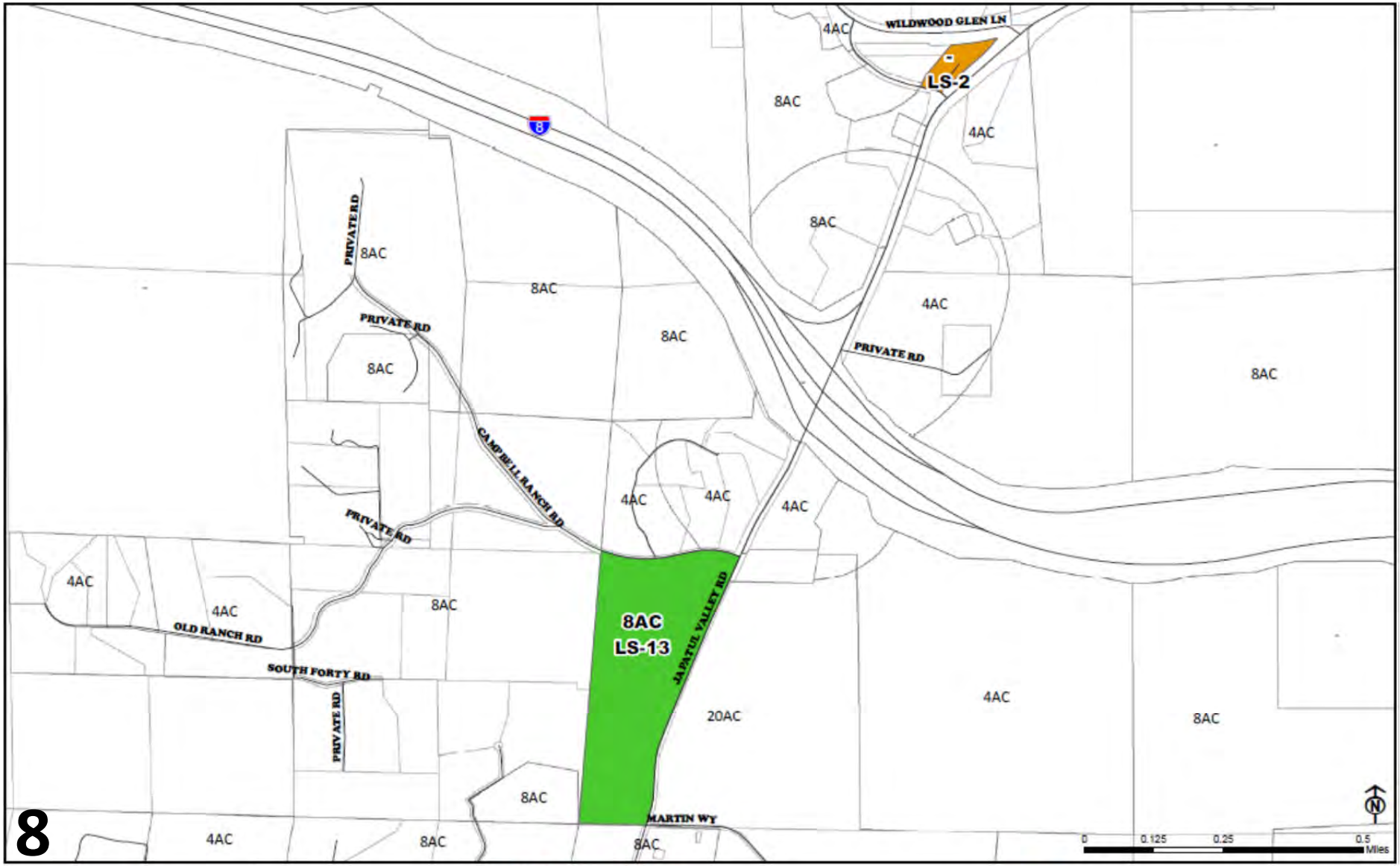
Attachment A

Form of Ordinance



COUNTY OF SAN DIEGO

PROPOSED ZONING DESIGNATIONS
OCTOBER 2016

FCI-LS-DESCANSO

FCI Zoning-Lot Size

LOT SIZE	FCI	OLD	NEW
-	LS-2	4 AC	-
8AC	LS-13	20 AC	8 AC

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COUNTY OF SAN DIEGO

PROPOSED ZONING DESIGNATIONS
OCTOBER 2016

FCI-LS-North Mountain

FCI Zoning- Lot Size

LOT SIZE	FCI	OLD	NEW
	LS-1	8 AC	-
	LS-2	4 AC	-
	LS-3	40 AC	-

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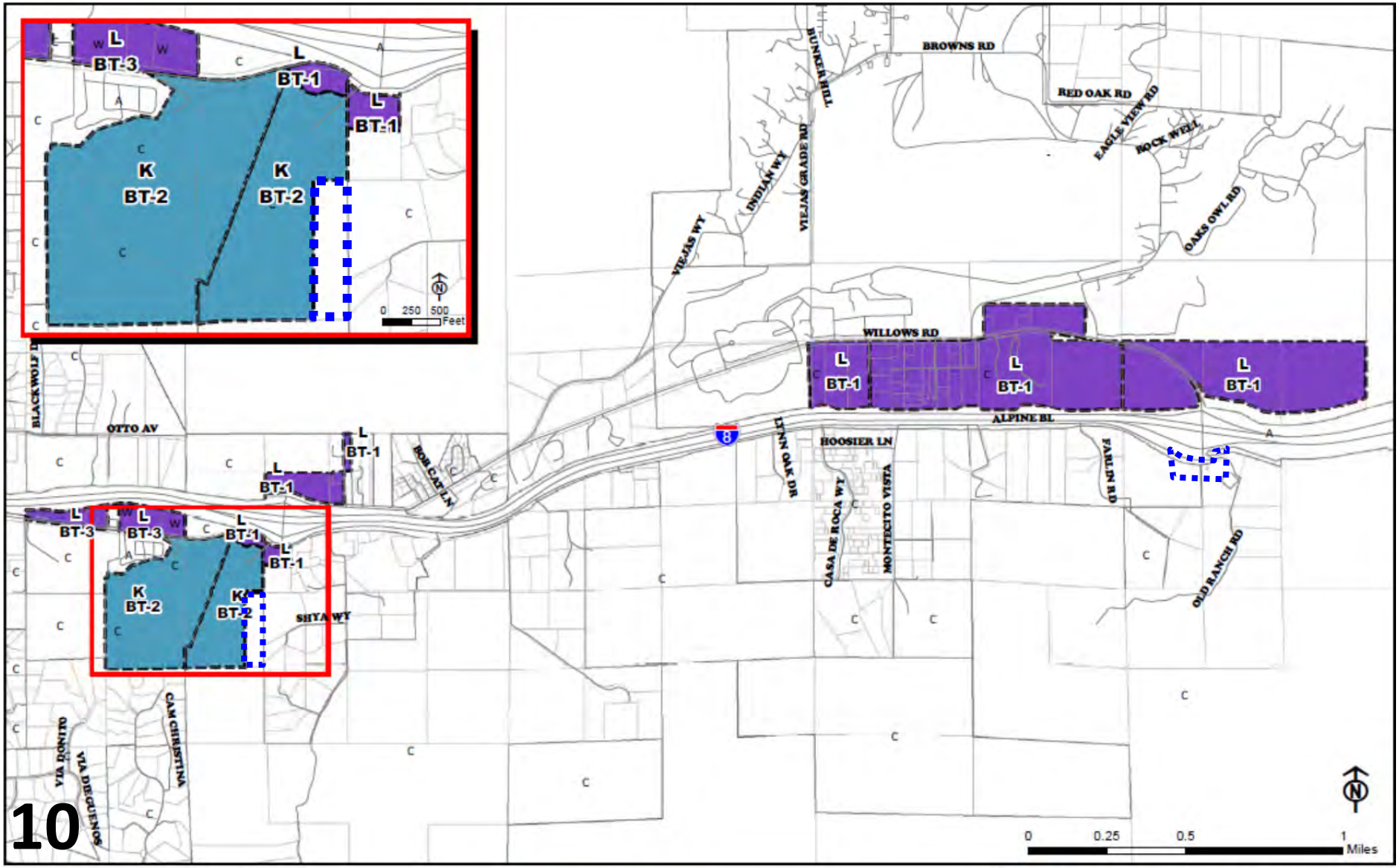

COUNTY OF SAN DIEGO

PROPOSED ZONING DESIGNATIONS
OCTOBER 2016

FCI-BT-ALPINE

FCI Zoning-Build Type

Build Type	FCI	OLD	NEW
K	BT-1	C	L
L	BT-2	C	K
	BT-3	W	L

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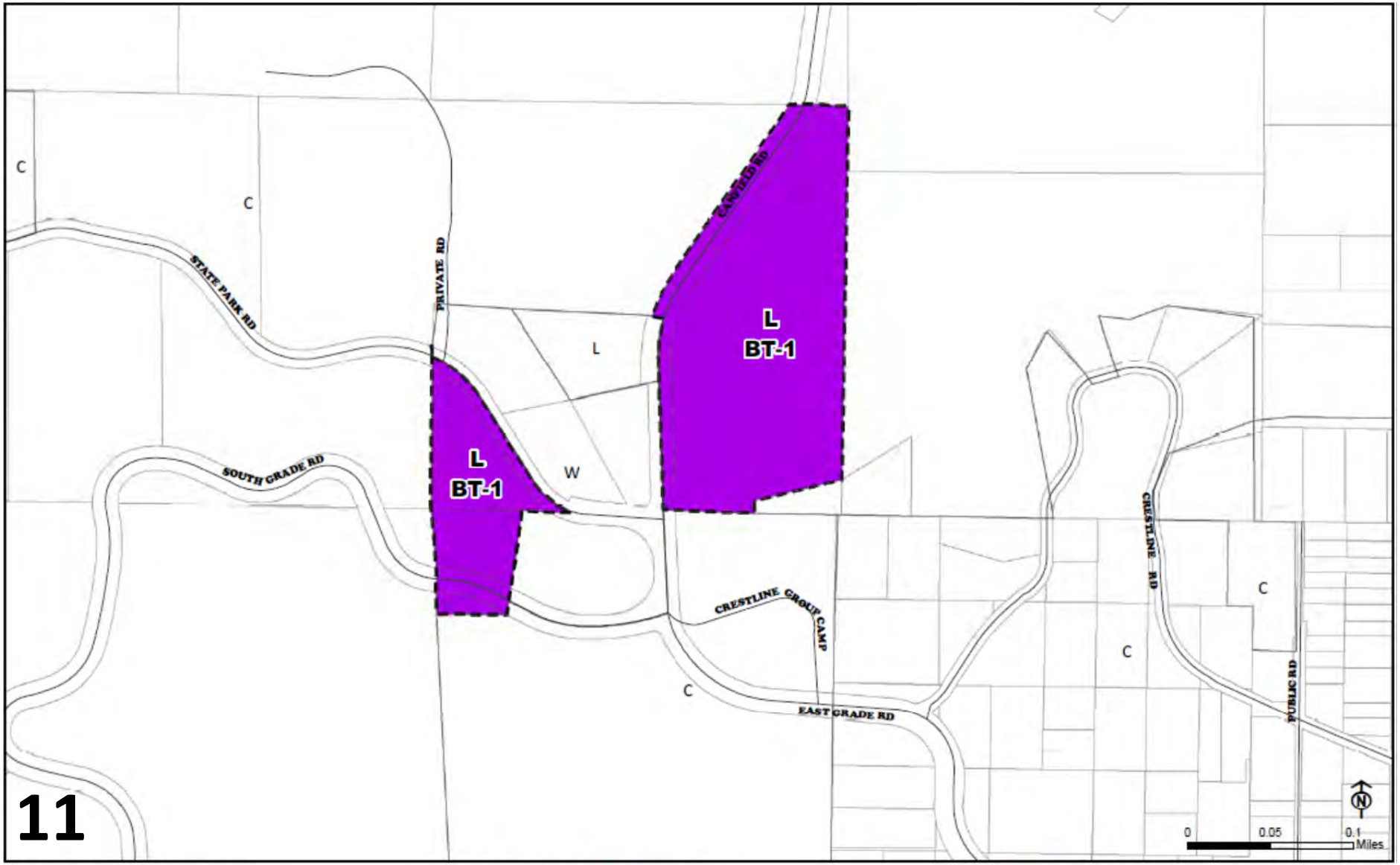

COUNTY OF SAN DIEGO

PROPOSED ZONING DESIGNATIONS
OCTOBER 2016

FCI-BT-North Mountain

FCI Zoning- Build Type

BUILD TYPE	FCI	OLD	NEW
L	BT-1	C	L

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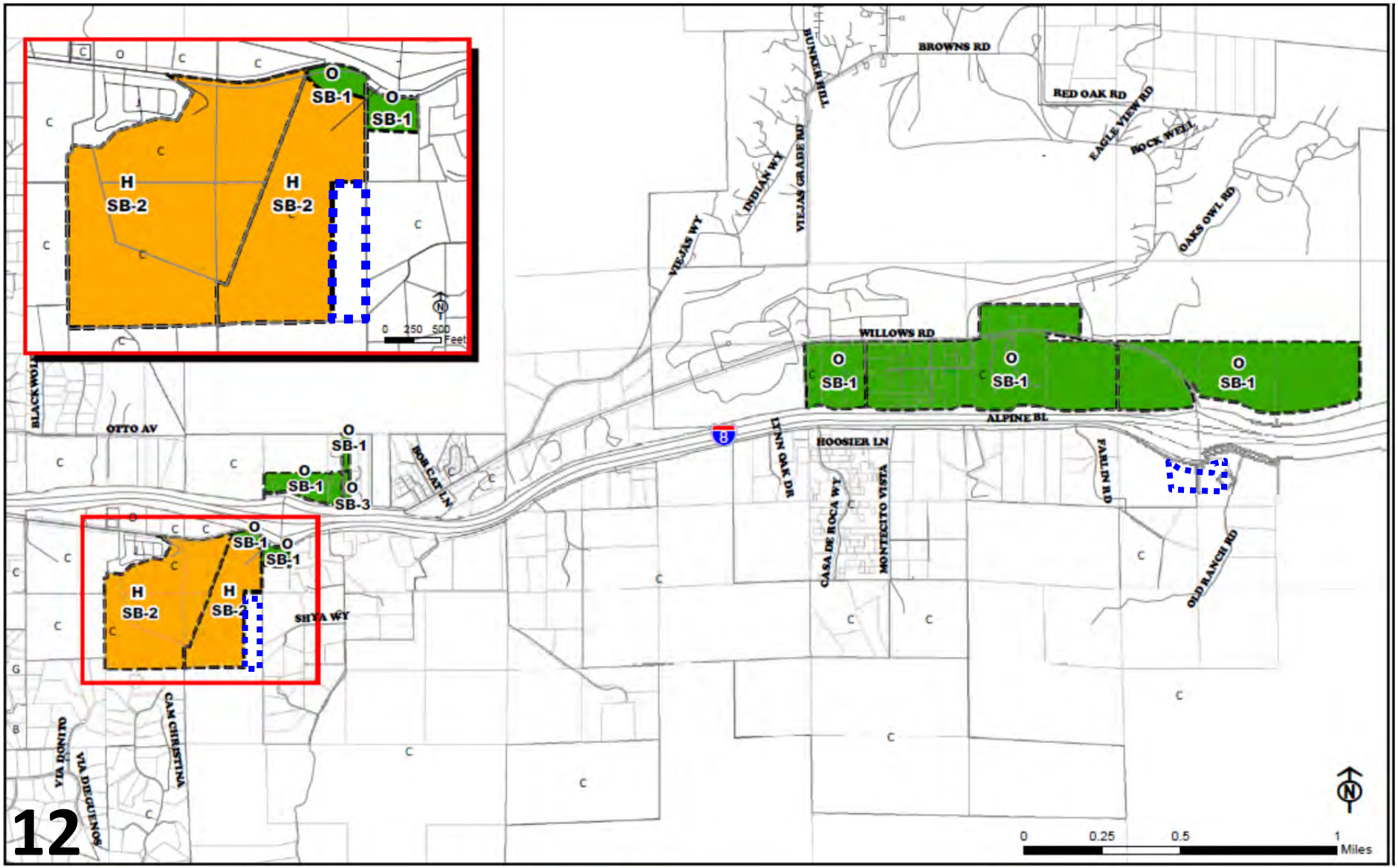
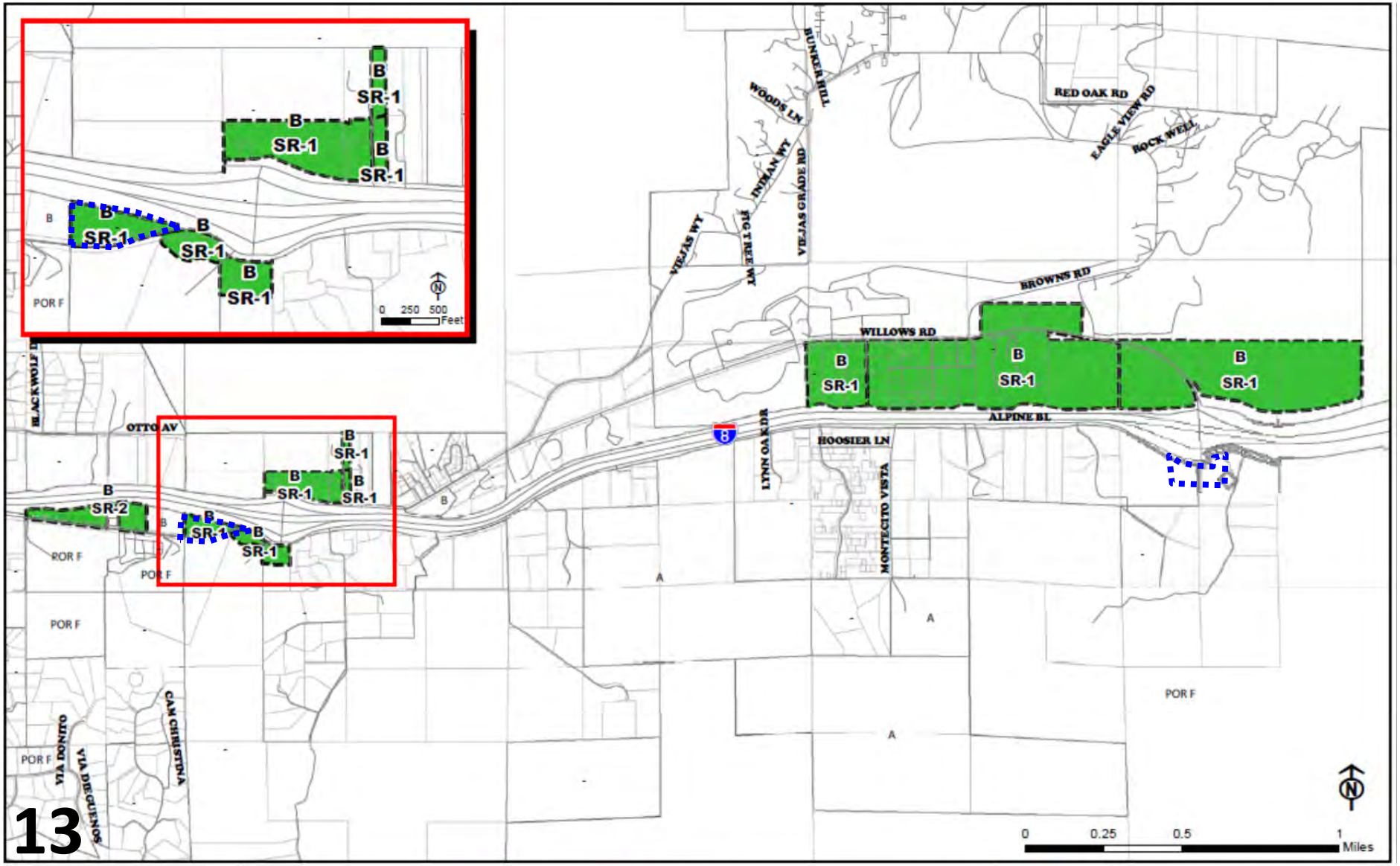


Attachment A

Form of Ordinance



COUNTY OF SAN DIEGO

PROPOSED ZONING DESIGNATIONS
OCTOBER 2016

FCI-SR-ALPINE

FCI Zoning-Special Regulations

SPECIAL REG	FCI	OLD	NEW
B	SR-1	-	B
	SR-2	B,D2	B

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Attachment B
Board Hearing Minute Order
June 25, 2014 (1)

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COUNTY OF SAN DIEGO
BOARD OF SUPERVISORS
WEDNESDAY, JUNE 25, 2014

MINUTE ORDER NO. 1

SUBJECT: NOTICED PUBLIC HEARING:
FOREST CONSERVATION INITIATIVE LANDS GENERAL PLAN AMENDMENT (GPA-12-004) (DISTRICTS: 2 AND 5)

OVERVIEW:
On December 8, 2010 (8), the Board of Supervisors (Board) directed staff to prepare a General Plan Amendment (GPA) for Forest Conservation Initiative (FCI) lands consistent with the appropriate General Plan Update land use designations. San Diego County voters passed the FCI in 1993, establishing 40-acre minimum lot sizes on private lands within the Cleveland National Forest (CNF). The FCI expired at the end of 2010 and FCI lands were not included in the County's 2011 General Plan Update due to timing. As a result, FCI lands have reverted to pre-General Plan Update land use designations. The purpose of this hearing is for the Board to provide direction to staff concerning a General Plan land use map for the former FCI lands and certain associated adjacent parcels totaling approximately 72,000 acres.

The Staff Recommendation Land Use Map (Attachment A) is the result of an extensive planning process conducted for this GPA. It would assign land use designations to former FCI lands and associated adjacent parcels as follows: 84.1% Rural Lands, 12.0% Semi-Rural, 0.3% Village Residential, and 3.5% miscellaneous other designations. Among the other options available for the Board's consideration are an Initial Draft Land Use Map created in 2012 with input from property owners and community planning groups, and a Planning Commission Recommendation Land Use Map, which modifies staff's recommendations in a few areas. The Board may also choose to provide staff direction that is different from any of these three map alternatives.

The Board direction provided at today's hearing will form the basis of a proposed land use map for the GPA. Staff is seeking Board direction to prepare a "final" map alternative to complete the Environmental Impact Report. Following today's hearing, staff will prepare final environmental documents to be considered for GPA approval at a subsequent Board hearing. Applicable zoning changes and revisions to the General Plan Land Use Element, the Mobility Element, and four community and subregional plans will ultimately be included with the GPA; however, these changes are not being considered at today's hearing.

FISCAL IMPACT:
N/A

BUSINESS IMPACT STATEMENT:
Completion of this program will result in land use designations that are consistent with the County's General Plan and will allow for development within the project area at densities that are appropriate in the vicinity of the Cleveland National Forest.

RECOMMENDATION:
PLANNING COMMISSION
The Planning Commission modified the Staff Recommendation Land Use Map and requests that the Board of Supervisors:

1. Accept the Staff Recommendation with stated modifications. [The Planning Commission Recommended Land Use Map is provided in Attachment B, on file with the Clerk of the Board.]

DEPARTMENT OF PLANNING & DEVELOPMENT SERVICES
Planning & Development Services recommends that the Board of Supervisors:

1. Provide direction to staff concerning the land use map for FCI lands and certain associated adjacent parcels, based on consideration of the following three land use map alternatives:
    a. Staff Recommendation Land Use Map (Attachment A, on file with the Clerk of the Board);
    b. Planning Commission Recommendation Land Use Map (Attachment B on file with the Clerk of the Board); or
    c. The 2012 Initial Draft Land Use Map.

2. Direct the Chief Administrative Officer to prepare final environmental documents necessary to approve the General Plan Amendment as directed by the Board of Supervisors.

1.1 ACTION – Communities of Desert, Jamul/Dulzura, Ramona and Julian:
ON MOTION of Supervisor Jacob, seconded by Supervisor Horn, the Board took action as recommended by both staff and the Planning Commission on these areas.

AYES: Cox, Jacob, D. Roberts, R. Roberts, Horn

1.2 ACTION –Palomar Mountain and North Mountain:
ON MOTION of Supervisor Horn, seconded by Supervisor D. Roberts, the Board took action as recommended by the Planning Commission on NM-2 and took action as recommended by staff on NM-1, NM-3 and all other areas, with the exception of Mr. Fisher's property.

AYES: Cox, Jacob, D. Roberts, R. Roberts, Horn

1.3 ACTION – Campo/Lake Morena and Mountain Empire:
ON MOTION of Supervisor Jacob, seconded by Supervisor R. Roberts, the Board took action as recommended by staff on LM-1 and all other areas.

AYES: Cox, Jacob, D. Roberts, R. Roberts
ABSENT: Horn

1.4 ACTION – Cuyamaca/Central Mountain:
ON MOTION of Supervisor Jacob, seconded by Supervisor Horn, the Board took action as recommended by the Planning Commission on CU-1; took action as recommended by the Planning Commission and staff on CM-1; and took action as recommended by both staff and the Planning Commission on all other areas.

AYES: Cox, Jacob, D. Roberts, R. Roberts, Horn

1.5 ACTION – Alpine:
ON MOTION of Supervisor Jacob, seconded by Supervisor R. Roberts, the Board took action as recommended by both staff and the Planning Commission on AL-1, AL-2A, AL-2B, AL-4, AL-9, AL-10, and AL-11A.

AYES: Cox, Jacob, D. Roberts, R. Roberts
ABSENT: Horn

1.6 ACTION – Alpine:
ON MOTION of Supervisor Jacob, seconded by Supervisor Horn, the Board took action as recommended by the Planning Commission on AL-3.

AYES: Cox, Jacob, D. Roberts, Horn
ABSENT: R. Roberts

1.7 ACTION – Alpine:
ON MOTION of Supervisor Jacob, seconded by Supervisor Cox, the Board took action as recommended by staff on AL-11B, further directing the Chief Administrative Officer to analyze in the Environmental Impact Report the recommendation by the Community Planning Group.

AYES: Cox, Jacob, D. Roberts
NOES: Horn
ABSENT: R. Roberts

1.8 ACTION – Alpine:
ON MOTION of Supervisor Jacob, seconded by Supervisor Cox, the Board took the following actions for AL-5, -6, -7:

- Directed the Chief Administrative Officer to work with the Community Planning Group, U.S. Forest Service, and the property owners to develop boundaries for a special study area to determine the appropriate land use densities;

- Directed the Chief Administrative Officer to determine the feasibility of developing the needed infrastructures such as water access, sewer, and fire protection, to support a given density to determine how to protect the U.S. Forest Service lands from development impacts and to explore funding mechanisms from property owners;

- Directed the Chief Administrative Officer to analyze the Planning Commission, staff, and Planning Group recommendations; and

- Directed the Chief Administrative Officer to return with a scope of work.

AYES: Cox, Jacob, D. Roberts, Horn
ABSENT: R. Roberts

1.9 ACTION – Alpine:
ON MOTION of Supervisor Jacob, seconded by Supervisor Cox, the Board directed the Chief Administrative Officer to refer the staff, Planning Commission and Community Planning Group recommendations on AL-8 for staff analysis in the Environmental Impact Report.

AYES: Cox, Jacob, D. Roberts
NOES: Horn
ABSENT: R. Roberts

1.10 ACTION – Alpine:
ON MOTION of Supervisor Jacob, seconded by Supervisor Cox, the Board took action as recommended by staff and the Planning Commission for all other areas of Alpine outside the Areas of Consideration.

AYES: Cox, Jacob, D. Roberts
NOES: Horn
ABSENT: R. Roberts

1.11 ACTION – Pendleton-DeLuz:
ON MOTION of Supervisor D. Roberts, seconded by Supervisor Cox, the Board took action as recommended by both staff and the Planning Commission.

AYES: Cox, Jacob, D. Roberts
NOES: Horn
ABSENT: R. Roberts

1.12 ACTION – Pine Valley:
ON MOTION of Supervisor Jacob, seconded by Supervisor Cox, the Board took action as recommended by both staff and the Planning Commission.

AYES: Cox, Jacob, D. Roberts
NOES: Horn
ABSENT: R. Roberts

1.13 ACTION – Descanso:
Supervisor Jacob made a motion, seconded by Supervisor Cox, for the Board to take action as recommended by both staff and the Planning Commission.

AYES: Cox, Jacob
NOES: D. Roberts, Horn
ABSENT: R. Roberts
(This motion failed due to lack of majority vote)

1.14 ACTION:
ON MOTION of Supervisor Cox, seconded by Supervisor Jacob, the Board directed the Chief Administrative Officer to prepare final environmental documents necessary to approve the General Plan Amendment as directed by the Board of Supervisors.

AYES: Cox, Jacob, Horn
NOES: D. Roberts
ABSENT: R. Roberts

- - -

State of California)
County of San Diego) §

I hereby certify that the foregoing is a full, true and correct copy of the original entered in the Minutes of the Board of Supervisors.

THOMAS J. PASTUSZKA
Clerk of the Board of Supervisors

By _____
Marvice E. Mazyck, Chief Deputy

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Attachment C

Draft Final
Supplemental Environmental Impact Report

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Attachment C-1
(ON CD-ROM)

DRAFT FINAL SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT

Forest Conservation Initiative Lands GPA (GPA 12-004)
State Clearinghouse (SCH) .13No. 2012081082

VOLUME I SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT

***Lead Agency*:**

County of San Diego
Planning & Development Services
5510 Overland Avenue, Suite 110
San Diego, California 92123

Contact: Peter Eichar, Environmental Coordinator
858.495.5524 / peter.eichar@sdcounty.ca.gov

October 2016

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TECHNICAL APPENDICES

Appendix A Notice of Preparation, August 30, 2012

Appendix B Notice of Preparation / Public Comments Received, August 30, 2012

Appendix C Air Quality/Global Climate Change Analysis, December 2012, updated June 2015

Appendix D Traffic Impact Assessment Technical Memorandum:
Comparison of Proposed Project Traffic Impacts
2013 Draft SEIR to Revised Draft SEIR, January 2016

Appendix E Technical Memorandum
Traffic Impacts: Comparison of SEIR Alternatives

Appendix F Greenhouse Gas Emissions Calculations

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Attachment C-2

Volume II

Summary of Changes to Draft SEIR
Comment Letters
Response to Comments

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SUMMARY OF CHANGES TO THE DRAFT SEIR

Introduction

This section includes text changes to the Draft Supplemental Environmental Impact Report (SEIR) for the Forest Conservation Initiative (FCI) Lands General Plan Amendment (GPA), dated January 2016. These modifications resulted from response to comments received during the Draft SEIR public review period as well as staff-initiated changes.

Revisions herein do not alter the conclusions of the environmental analysis such that new significant environmental impacts have been identified, nor do they constitute significant new information. Changes are provided in tracking mode (underline for new text and strike-out for deleted text). Minor text changes, such as typographical errors, were made to the Final EIR as necessary. However, these minor text changes are not included in this document.

Text Changes and Edits to the Draft SEIR

Recirculation Readers Guide

No changes were made to this section of the SEIR.

Acronyms and Abbreviations

No changes were made to this section of the SEIR.

Summary

- On Draft SEIR page S-1, the following new paragraph has been added at the top of the page, as follows:

  This chapter is a summary of the Supplemental Environmental Impact Report (SEIR) for the County of San Diego Forest Conservation Initiative (FCI) Lands General Plan Amendment (GPA), prepared pursuant to the California Environmental Quality Act (CEQA). The environmental analyses and their technical appendices are included in Volume I of the SEIR. Changes between the Draft SEIR circulated for public review and the Final SEIR are shown in tracked changes mode. Comments on the Draft SEIR are provided in Volume II, which also includes responses to comments and a summary of revisions to the Draft SEIR. Finally, Volume III is an environmental analysis of the Recommended Project, which is the alternative derived through Planning Commission and Board of Supervisor hearings.

Chapter 1.0 Project Description, Location, and Environmental Setting

- Pages 1-13 to 1-14, Table 1-1C, Proposed Project Buildout and Additional Subdivision Potential, has been added, as follows:

Community	# Parcels	Acres	Number of Potential Residential Lots			
			SEIR Proposed Project		No Project (Existing GP)	
			Buildout	Additional	Buildout	Additional
Alpine	**1,336**	**13,512**	**3,561**	**2,225**	**2,297**	**961**
Central Mnt.	**963**	**25,850**	**1,082**	**119**	**5,618**	**4,655**
Cuyamaca	79	2,965	107	28	289	210
Descanso	589	5,581	615	26	1,340	751
Pine Valley	202	12,382	255	53	2,862	2,660
Unrepresented	93	4,921	105	12	1,127	1,034
Desert	**2**	**166**	**2**	**0**	**8**	**6**
Jamul/Dulzura	**48**	**1,246**	**58**	**10**	**193**	**145**
Julian	**328**	**8,467**	**384**	**56**	**2,489**	**2,161**
Mnt. Empire	**40**	**2,051**	**52**	**12**	**385**	**345**
L.Morena/Campo	38	1,562	49	11	331	293
Unrepresented	2	490	3	1	54	52
North Mnt.	**882**	**17,221**	**907**	**25**	**3,612**	**2,730**
Palomar Mnt.	786	12,093	806	20	3,022	2,236
Unrepresented	96	5,128	101	5	590	494
Pendleton/DeLuz	**17**	**1,011**	**19**	**2**	**221**	**204**
Ramona	**159**	**725**	**180**	**21**	**239**	**80**
TOTAL	**3,775**	**70,250**	**6,245**	**2,470**	**15,062**	**11,287**

Source: County of San Diego, Planning & Development Services, 2016.

Note: This table is based on high level GIS data and does not take into consideration of any site planning constraints that may reduce the potential number of new lots. In addition, the data does not include parcels proposed for non-residential uses, such as Open Space (Conservation), Public Agency Lands, Tribal Lands, and Rural Commercial.

- Page 1-14, a description of the new table has been assed as follows:

  The full potential buildout that would be allowed under the proposed Project is shown in Table 1-1A (see last column). Table 1-1C shows the potential number of additional residential lots that would be allowed under both the proposed Project and existing General Plan (No Project Alternative). This Table shows that, while the proposed Project would allow 6,245 lots at buildout, only 2,395 of these lots would be in addition to existing lots. This is substantially less potential lots than would be allowed by the existing General Plan, where 15,062 lots would result with full buildout, 11,212 of which would be in addition to existing lots.

- Page 1-44, text describing the AB 52 consultation has been added, as follows:

  Assembly Bill 52 was enacted in 2014, with several provisions governing tribal cultural resources and early consultation with tribes. Assembly Bill 52 applies to EIRs for which the notice of preparation is issued after July 1, 2015. The notice of preparation for this EIR was issued in September 2012, so Assembly Bill 52 does not apply to this EIR. Nevertheless, the County elected to conduct consultation consistent with Assembly Bill 52. That consultation was initiated concurrent with the public review of the recirculated Draft SEIR in January 2016. The County consulted with the Viejas and Rincon Native American tribes and

provided a status of the Project, emphasized that this project consists of changes to the General Plan and Community Plan and does not include any earth disturbing activities as subsequent discretionary permits will require CEQA review and consultation.

Section 2.1, Aesthetics

No changes were made to this section of the SEIR.

Section 2.2, Agricultural and Forestry Resources

No changes were made to this section of the SEIR.

Section 2.3, Air Quality

No changes were made to this section of the SEIR.

Section 2.4, Biological Resources

- Page 2.4-3, edits to the paragraph at the top of the page have been made, as follows:

  This proposed Project consists of changes to the land use designations over 71,700 acres of land which support special status plant and wildlife species. Similar to the 2011 General Plan, the project would directly or indirectly impact habitats of candidate, sensitive, or special status species. The General Plan Update PEIR included a discussion of each vegetation community in the unincorporated County and the species supported by each vegetation community in Section 2.4.1.2 of the General Plan Update PEIR. Table 2.4-1 (Habitat Impacts by Vegetation Community) ~~quantifies~~ compares the total number of acres of each vegetation community with the number of acres that could be potentially affected by new development under the proposed Project…….

- Page 2.4-3, edits to the paragraph at the top of the page have been made, as follows:

  Figures 2.4-1A and 2.4-1B illustrates the location of the vegetation communities within the Project area boundary and estimates of the vegetation impacts are shown in Figure 2.4-2A and 2.4-2B in addition to Table 2.4-1. Also, community level figures of the estimated vegetation impacts are provided as Figures 2.4-5.1 through 2.4-5.13 (Estimated Vegetation Impacts). …….

- Page 2.4-5, edits to paragraph #4 have been made, as follows:

  Rural lands (RL-20, RL-40 and RL-80) are estimated to have five acres of impact per potential dwelling unit. A 25% impact is identified for areas assigned a RL-20 designation, a 12.5% impact for areas assigned a RL-40 designation and a 6% impact for areas assigned RL-80, based on a five-acre per dwelling unit assumption for lands outside the MSCP Area. Within PAMA, the potential impact is 2.5 acres per dwelling unit.

- Page 2.4-5 to 2.4-6, a new paragraph at the bottom of the page has been added, as follows:

Table 2.4-3 (Level of Impact: MSCP Parcels) identifies, by potential level of impact, the number of parcels and acres within the South County, draft North County and in-process East County MSCP. This table shows that of the 53,919 acres within MSCP PAMA and preserves, only 12,547 acres would have any subdivision potential under the proposed Project. Table 2.4-4 (Level of Impact: Parcels Adjacent to Conserved Lands) identifies the potential level of impact to parcels adjacent to conserved lands. This table shows that of the 10,264 acres adjacent to conserved lands and preserves, only 2,628 acres would have any subdivision potential under the proposed Project.

- Page 2.4-8 to 2.4-9, edits to the paragraph at the bottom of the page have been made, as follows:

  The proposed Project's direct, indirect and cumulative impacts would be reduced by the same regulations, implementation programs (2011 General Plan goals/policies) and mitigation measures from the General Plan Update PEIR and repeated in Section 2.4.4.4 below. However, implementation of the mitigation measures listed in Section 2.4.4.4 would not reduce these impacts to below a level of significance. Implementation of the MSCP, County of San Diego ~~While the direct and cumulative impacts within the South County MSCP will be mitigated below a level of significance through implementation of the~~ Subarea Plan and the Biological Mitigation Ordinance will provide for mitigation of the direct and cumulative impacts within the Subarea Plan area (southwestern portion of the county). For the northwestern and eastern portions of the county, ~~the North County and East County~~ MSCP Plans have ~~are~~ not yet adopted. As such, any contribution to the cumulative loss of wildlife corridors in the draft North and East County Plan areas would be cumulatively considerable, even after mitigation has been implemented for individual projects. It should be noted; however, that an interim North and East County MSCP Planning Agreement (dated October 29, 2008~~May 16, 2014~~) is in place between the County, the CDFW, and the USFWS. Among other things, this agreement establishes a process to review interim development within the Planning Areas that will help achieve the preliminary conservation objectives and preserve options for establishing a viable reserve system or equivalent long-term conservation measures, but until those MSCP Plans are completed and approved, the proposed Project would result in significant and unavoidable direct, indirect and cumulative impacts on wildlife corridors and nursery sites.

- Pages 2.4-19 to 2.4-20, a column titled "Total Acres" has been added to Table 2.4-1.

Vegetation Categories	Impacted Acres	Total Acres
Forest	**2,001**	**14,221**
81100 Mixed Evergreen Forest	507	4,319
81300 Oak Forest	1	24
81310 Coast Live Oak Forest	12	151
81320 Canyon Live Oak Forest	1	10
81340 Black Oak Forest	117	311

Vegetation Categories	Impacted Acres	Total Acres
84140 Coulter Pine Forest	13	206
84150 Bigcone Spruce (Bigcone Douglas Fir)-Canyon Oak Forest	265	1,720
84230 Sierran Mixed Coniferous Forest	402	2,016
84500 Mixed Oak/Coniferous/Bigcone/Coulter	470	4,138
85100 Jeffrey Pine Forest	213	1,326
Grasslands, Vernal Pools, Meadows, and Other Herb Communities	**797**	**6,254**
42000 Valley and Foothill Grassland	87	758
42100 Native Grassland	20	27
42110 Valley Needlegrass Grassland	3	35
42120 Valley Sacaton Grassland	97	289
42200 Non-Native Grassland	98	608
42300 Wildflower Field	1	8
42400 Foothill/Mountain Perennial Grassland	258	2,644
45100 Montane Meadow	6	75
45110 Wet Montane Meadow	92	1,082
45400 Freshwater Seep	54	476
52400 Freshwater Marsh	0	2
18310 Field/Pasture	81	250
Riparian and Bottomland Habitat	**458**	**1,770**
13140 Freshwater	49	228
13200 Non-Vegetated Channel, Floodway, Lakeshore Fringe	7	26
61300 Southern Riparian Forest	14	111
61310 Southern Coast Live Oak Riparian Forest	213	784
61330 Southern Cottonwood-willow Riparian Forest	29	207
61510 White Alder Riparian Forest	7	53
62000 Riparian Woodlands	9	31
62400 Southern Sycamore-alder Riparian Woodland	2	22
63300 Southern Riparian Scrub	128	309
Scrub and Chaparral	**6,800**	**32,146**
32500 Diegan Coastal Sage Scrub	279	2,610
35200 Sagebrush Scrub	52	447
35210 Big Sagebrush Scrub	32	39
35210 Sagebrush Scrub	52	447
37000 Chaparral	122	757
37120 Southern Mixed Chaparral	1,182	2,768
Vegetation Categories	**Impacted Acres**	**Total Acres**
37121 Granitic Southern Mixed Chaparral	1,487	4,330
37122 Mafic Southern Mixed Chaparral	39	120
37130 Northern Mixed Chaparral	766	4,622
37131 Granitic Northern Mixed Chaparral	1,075	7,607
37132 Mafic Northern Mixed Chaparral	77	945
37200 Chamise Chaparral	721	2,613

Vegetation Categories	Impacted Acres	Total Acres
37210 Granitic Chamise Chaparral	355	1,677
37220 Mafic Chamise Chaparral	16	27
37300 Red Shank Chaparral	83	663
37400 Semi-Desert Chaparral	4	34
37500 Montane Chaparral	15	156
37520 Montane Manzanita Chaparral	5	34
37530 Montane Ceanothus Chaparral	2	27
37540 Montane Scrub Oak Chaparral	14	80
37900 Scrub Oak Chaparral	85	933
37A00 Interior Live Oak Chaparral	3	40
37G00 Coastal Sage-Chaparral Scrub	230	867
37K00 Montane Buckwheat	104	302
Woodland	**2,472**	**14,731**
62000 Riparian Woodlands	9	31
62400 Southern Sycamore-alder Riparian Woodland	2	22
63300 Southern Riparian Scrub	128	309
63310 Mule Fat Scrub	0	0
63320 Southern Willow Scrub	11	60
70000 Woodland	2	13
71100 Oak Woodland	0	5
71120 Black Oak Woodland	133	1,346
71160 Coast Live Oak Woodland	12	163
71161 Open Coast Live Oak Woodland	72	447
71162 Dense Coast Live Oak Woodland	902	4,788
71180 Engelmann Oak Woodland	0	0
71181 Open Engelmann Oak Woodland	535	2,889
71182 Dense Engelmann Oak Woodland	154	1,491
77000 Mixed Oak Woodland	490	2,963
78000 Undifferentiated Open Woodland	16	154
79000 Non-Native Woodland	4	37
79100 Eucalyptus Woodland	2	13
Total Vegetation Impact	**12,528**	**69,122**

Source: LUEG GIS 2014a

- Page 2.4-22, a new table titled "2.4-3 Level of Impact: MSCP Parcels" has been added:

Level of Impact	Number of Parcels				Acreage			
	SCMSCP	Draft NCMSCP	In-process ECMSCP	Total	SCMSCP	Draft NCMSCP	In-process ECMSCP	Total
No Subdivision Potential								
0.0%	—	1	3	**4**	—	16.6	97.4	**114.1**
6.3%	—	24	362	**386**	—	1,289.2	18,014.3	**19,303.5**
12.5%	22	5	609	**636**	305.7	14.7	16,287.2	**16,607.6**
25.0%	—	—	128	**128**	—	—	2,114.7	**2,114.7**
50.0%	—	2	182	**184**	—	19.9	1,663.7	**1,683.6**
75.0%	5	4	209	**218**	109.9	10.3	550.1	**670.2**
100.0%	—	2	73	**75**	—	92.0	786.4	**878.4**
TOTAL	**27**	**38**	**1,566**	**1,631**	**415.6**	**1,442.6**	**39,513.8**	**41,372.1**
Additional Subdivision Potential								
6.3%	—	4	31	**35**	—	549.9	6,647.3	**7,197.2**
12.5%	—	4	24	**28**	—	326.6	4,186.9	**4,513.5**
25.0%	—	—	4	**4**	—	—	835.9	**835.9**
TOTAL	**0**	**8**	**59**	**67**	**0.0**	**876.5**	**11,670.1**	**12,546.6**

Source: LUEG GIS 2016

- Page 2.4-22, a new table titled "2.4-4 Level of Impact: Parcels Adjacent to Conserved Lands" has been added:

Level of Impact	Parcels	Acreage
No Subdivision Potential		
0.0%	**35**	**1,163**
6.3%	**109**	**3,338**
12.5%	**59**	**1,688**
25.0%	**76**	**404**
50.0%	**87**	**757**
75.0%	**71**	**136**
100.0%	**51**	**150**
TOTAL	**488**	**7,636**
Additional Subdivision Potential		
6.3%	**5**	**1,113**
12.5%	**8**	**1,217**
50.0%	**5**	**21**
75.0%	**4**	**152**
100.0%	**13**	**125**
TOTAL	**35**	**2,628**

Source: LUEG GIS 2016

- Figures 2.4-2A and 2.4-2B have been amended to include potential impacts to East County in-process MSCP Focused Conservation Areas, along with other conserved lands. In addition, the ≤25%impact category has been expanded into two categories: (1) ≤12.5% and (2) 25%.

- Figures 2.4-4.1 through 2.4-4.13 have been added that show similar information shown on Figures 2.4-2A and 2.4-2B, but at the community level. In addition, these more detailed maps also show Biological Core Resource Areas and designated wildlife corridors and linkages.

Section 2.5, Cultural Resources

- Page 2.5-14, Mitigation Measure Cul-2.6 has been revised as follows:

  Protect significant cultural resources by facilitating the identification and acquisition of important resources through regional coordination with agencies, and institutions, such as the SCIC and consultation with the NAHC and local tribal governments, including SB-18 and AB-52 review, while maintaining the confidentiality of sensitive cultural information.

Section 2.6, Hazards and Hazardous Materials

No changes were made to this section of the SEIR.

Section 2.7, Hydrology and Water Quality

No changes were made to this section of the SEIR.

Section 2.8, Land Use

No changes were made to this section of the SEIR.

Section 2.9, Mineral Resources

No changes were made to this section of the SEIR.

Section 2.10, Noise

No changes were made to this section of the SEIR.

Section 2.11, Public Services

No changes were made to this section of the SEIR.

Section 2.12, Recreation

No changes were made to this section of the EIR.

Section 2.13, Transportation and Traffic

No changes were made to this section of the EIR.

Section 2.14, Utilities and Service Systems

No changes were made to this section of the EIR.

Section 2.15, Global Climate Change

- Page 2.15-20, the following has been added to the last paragraph:

  The applicable mitigation measure that would implement the policy is shown in brackets at the end of each policy.

- Page 2.15-21, the applicable mitigation measure has been added to the end of each policy as shown below:

  Policy COS-10.7: Recycling of Debris. Encourage the installation and operation of construction and demolition (C&D) debris recycling facilities as an accessory use at permitted (or otherwise authorized) mining facilities to increase the supply of available mineral resources. [CC-1.19]

  Policy COS-15.1: Design and Construction of New Buildings. Require that new buildings be designed and constructed in accordance with "green building" programs that incorporate techniques and materials that maximize energy efficiency, incorporate the use of sustainable resources and recycled materials, and reduce emissions of GHGs and toxic air contaminants. [CC-1.1]

  Policy COS-15.2: Upgrade of Existing Buildings. Promote and, as appropriate, develop standards for the retrofit of existing buildings to incorporate architectural features, heating and cooling, water, energy, and other design elements that improve their environmental sustainability and reduce GHG. [CC-1.9]

  Policy COS-15.3: Green Building Programs. Require all new County facilities and the renovation and expansion of existing County buildings to meet identified "green building" programs that demonstrate energy efficiency, energy conservation, and renewable technologies. [CC-1.1, CC-1.16, CC-1.18]

  Policy COS 17.1: Reduction of Solid Waste Materials. Reduce greenhouse gas emissions and future landfill capacity needs through reduction, reuse, or recycling of all types of solid waste that is generated. Divert solid waste from landfills in compliance with State law. [CC-1.6, CC-1.17]

  Policy COS 17.5: Methane Recapture. Promote efficient methods for methane recapture in landfills and the use of composting facilities and anaerobic digesters and other sustainable strategies to reduce the release of GHG emissions from waste disposal or management sites and to generate additional energy such as electricity. [USS-6-7 in GPU FEIR]

  Policy COS-18.2: Energy Generation from Waste. Encourage use of methane sequestration and other sustainable strategies to produce energy and/or reduce GHG emissions from waste disposal or management sites. [CC-1.9]

Policy COS 20.2: GHG Monitoring and Implementation. Establish and maintain a program to monitor GHG emissions attributable to development, transportation, infrastructure, and municipal operations and periodically review the effectiveness of and revise existing programs as necessary to achieve GHG emission reduction objectives. [CC-1.3]

Policy COS 20.4: Public Education. Continue to provide materials and programs that educate and provide technical assistance to the public, development professionals, schools, and other parties regarding the importance and approaches for sustainable development and reduction of GHG emissions. [CC-1.14]

- Page 2.15-25, add the following two sentences to the end of the last paragraph on the page, as follows:

  CC-20 requires the County to continue to maintain and monitor inactive solid waste disposal sites to ensure compliance with environmental regulations to minimize GHG emissions. CC-21 requires the County to streamline regulations that encourage the use of alternative energy systems, such as photovoltaics and wind.

Chapter 3.0, Other CEQA Considerations

No changes were made to this section of the EIR.

Chapter 4.0, Project Alternatives

- Page 4-7, for added clarification a title has been added to the table on this page, as follows:
  Comparison of Alternatives to the FCI Condition

- Page 4-15, the following has been added to the end of the second paragraph under "City-Centered Alternative:"

  Therefore, the County finds it would be infeasible to consider this alternative given the following:

  - The high potential for the additional development to result in increased impacts to air quality, traffic, noise and community character in the cities where it is being added; and
  - The County does not have any land use jurisdiction in the cities to ensure that the additional development would be approved.

Chapter 6.0, Preparers and Persons Contacted

- Page 6-1, the following were added as County of San Diego SEIR Preparers:
  Gregory Kazmer Land Use Environmental Planner

- Page 6-2, the following were added as County of San Diego SEIR Reviewers:
  Mary Kopaskie Brown Advance Planning, Chief
  Darin Neufeld Land Use Environmental Planning Manager

Gregory Kazmer Land Use Environmental Planner

Chapter 7.0, Mitigation Measures

No changes were made to this section of the EIR.

Appendix F, Greenhouse Gas Emissions Calculations

- Page F-3, Table 3 (SEIR Proposed Project: FCI Lands Build-out Vehicle Miles Traveled Calculation) has been moved from F-14 and reformatted (no change in the data being presented).
- Page F-4, Table 4 (Estimated Build-out Vehicle Miles Traveled in FCI-lands and Unincorporated Area for Proposed Project) has been moved from page F-3 and reformatted (no change in the data being presented).
- Page F-4, Table 5 has been added showing projected fuel consumption for each analysis year (see also below).

Table 5 Annual Fuel Consumption Forecasts – SEIR Proposed Project

Fuel Type	Percent VMT (EMFAC 2014)	Annual VMT	Gallons per mile or kWh/100 miles	Miles per gallon	Annual Fuel Consumption (Gallons or kWh)
2020					
Diesel	6%	3,486,019	0.1176	9	409,956
Gasoline	92%	51,989,905	0.0431	23	2,240,765
Electric	2%	969,036	29	-	281,020
2030					
Diesel	7%	16,559,288	0.1091	9	1,806,618
Gasoline	84%	209,977,293	0.0280	36	5,879,364
Electric	9%	22,063,614	29	-	6,398,448
2050					
Diesel	7%	33,761,647	0.1107	9	3,737,414
Gasoline	83%	390,044,312	0.0261	38	10,180,157
Electric	10%	44,575,151	29	-	12,926,794

Notes: kWh = kilowatt-hours; VMT = vehicle miles traveled

Electric fuel consumption is in kWh

Source: EMFAC2014 and Data compiled by Ascent Environmental, Inc. in 2015

- Page F-5, Table 6 (Electricity Emission Factors for San Diego Gas & Electric) is a reformatted Table 5, which has been moved from pages F-4 and F-5 (no change in the data being presented).
- Page F-6, Table 7 (Natural Gas Emission Factors for San Diego Gas & Electric) is a reformatted Table 6, which has been moved from page F-5 (no change in the data being presented).
- Page F-7, Table 8 (Housing Units and Population Data) is a reformatted Table 7, which has been moved from page F-6 (no change in the data being presented).

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COMMENT LETTERS

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Windfall Ranch

Terry & David Howe

619 445 5443

21800 Japatul Valley Rd

Alpine, CA 91901

www.windfallranch.net

January 14, 2016

Department of Planning and Development Services
5510 Overland Avenue, Suite 300
San Diego, CA 92123

RE: APN 524-040-03 and 524-040-02 FCI

To Whom it May Concern:

We are the owners of Windfall Ranch, encompassing 475 acres on Japatul Valley Road in the Alpine area. While our main endeavor on this property is to operate an equestrian boarding facility, it has been our dream to someday facilitate development of part of the property into home sites.

We initially requested 20 acre minimum over the entirety of the property. That did not seem unreasonable to us because our immediate neighbors to the north (Japatul Estates, an extensive development on Larry Lane) are developed on 8 acres and less; and the same is true of our immediate neighbors touching our westernmost boundary across Japatul Valley Road. We greatly appreciate the fact that the Alpine Community Planning Group has always supported our request for this classification with unanimity which is unusual, to say the least. The Japatul Valley is a fertile area with plenty of water.

However, the San Diego County Planning Commission did not entirely agree. They recommended that only 120 acres of our holding be allowed the 20 acre minimum classification of RL-20. This recommendation is shown in Figure 4-3A of the Alpine Land Use Map Alternative.

While we would prefer the recommendation of the Alpine Planning Group, we can accept the recommendation shown in Figure 4-3A, so long as we can "cluster" lots in our preferred areas near other developments of similar size, and realize a potential of at least 14 lots

Thank you for your consideration.

Terry Howe

From: Cynthia Garrison
Sent: Thursday, January 28, 2016 5:42 PM
To: Citrano, Robert
Subject: Draft Supplemental Environmental Impact Report Review

Dear Mr. Lyon and Mr. Citrano,

After reading the draft of the Supplementary Environmental Impact Report, my husband and I are very impressed with the scope and depth of the report and the
consistent and coherent vision and analysis of possible regional growth based on 10 fundamental principals intended to guide future growth within the County.
We appreciate the leadership of the APG in ensuring that the study for this project has moved forward over recent months.

As property owners of a 5-acre parcel on Alpine Blvd near East Willows Road, we want to indicate our support for the "Proposed Project" in the SEIR and our rejection of both the "Mid-density Alternative" and the "Alpine Alternative Land Use Map." We believe that the "Proposed Plan" is the only plan that ensures that the area where our property is located is included in the benefits of development. The "Alpine Alternative" would propose to maintain the current or exixting General Plan densities of 1 dwelling unit per 4 acres. This would ensure that the existing inadequate roadway widths, dead-end roads, one-way roads, and gated communities would continue to impair emergency access in this area. In the absence of the benefits of "Proposed Plan" by the County, we will continue to be unsafe when faced with an emergency. The second major concern about the alternative plans is that our parcel and those around us are not included in the improvement of water quality standards as planned in the "Proposed Plan." As the report indicated, "Violation of ground water quality standards by designating land uses that would be ground water dependent in areas currently exposed to ground water contamination."

In conclusion, the "Proposed Plan" for East Alpine is the only plan that ensures that the benefits of development will be based on the 10 guiding principals for future development of Alpine. Ensuring the safety of all through well planned roads and emergency access is critical to us, and access to quality water is essential in any plan for the future.
We believe that those who support the "Mid-density Plan" or the "Alpine Alternative Land Use Map" are not guided by the 10 sound principals underlying the proposed future development of Alpine. Self interest of a few cannot prevail over the consistent and coherent vision of regional growth.

Sincerely,
Cynthia and Alberto Arce
5615 Alpine Blvd
Alpine, CA 91901

January 29, 2016

Planning & Development Services

5510 Overland Avenue, Suite 310

San Diego, California 92123

RE: GPA12-004; SCH NO. 2012081082; Forest Conservation Initiative Lands

General Plan Amendment

For the following reasons we again request RL20 in the Japatul Lane area of Alpine, and object to the RL40 designation as recommended by the County Planning and Development department.

- There is no significant impact in the SEIR, and the draft recirculated SEIR with an RL20 designation.
- The RL20 designation has consistently been upheld and approved by the Alpine Community Planning Group throughout many meetings over the past several years, as well as recommended to the county in the draft SEIR and Recirculated SEIR.
- The Japatul area is part of the Alpine community, and not remote or removed back country area.
- The downsizing to the RL40 designation would create hardship, reduce property value, and degradation of the area insuring future blight. Almost all the petitioning owners of properties on Japatul are seniors over the age of 65. Directly and cumulatively the RL40 designation would impact the quality, character and vitality of the Japatul Lane area. RL 20 would allow the ability to retain and enhance the rural character and economy of the Japatul and Alpine area.

We respectfully ask your favorable consideration and grant us the deserved RL20 designation.

I did not address concerns of the Forest Service as we are tax paying private property owners and not indentured buffers of the National Forest. And though not as financially lucrative, we are perhaps the better stewards of the land and neighbors, than SRPL. As to the concern of wildfires, we are in a high fire area, as is most of the county now, not just Japatul and not just Alpine. But during the last big fire, prior to staging at Viejas, the Fire Fighters staged at the end of Japatul Lane as the topography and geography allow it. RL20 is the deserved designation for our area.

Thank you,

M. K. Borchard

Mary Kay Borchard, 21916 Japatul Lane, Alpine, 91901 691 445 9095

cc: Supervisor Dianne Jacob

February 1, 2016

Planning and Development Services

5510 Overland Avenue, Suite 310

San Diego, CA 92123

RE: GPA 12-004; SCH NO. 2012081082; Forest Conservation Initiative Lands, GPA

We request RL20 land use designation for our home and property. The affected property owners who live on Japatul Lane and the Japatul Valley have repeatedly asked for the RL-20 designation, and have had the consistent support and recommendation to the County on this designation.

We have lived on Japatul Lane for generations and are very much invested in the character and vitality of the land and our home. We would like to be able to continue to enjoy living in the Japatul Valley with, and for, our adult children, adult grand children, and future great grandchildren.

R. B. Beale

Robert Beale 21875 Japatul Lane, Alpine 91901 619-445-3306

Parcel # 523-100-13-00 and # 523-100-29-00

21912 Japatul Lane, Alpine 91901

Parcel # 523-100-15-00

Sharon Beale

Sharon Beale 21875 Japatul Lane, Alpine, 91901 619-445-3307

Parcel # 523-100-13-00 and # 523-100-29-00

21912 Japatul Lane, Alpine, 91901

Parcel # 523-100-15-00

cc: Supervisor Dianne Jacob

February 1, 2016

Planning and Development Services

5510 Overland Avenue, Suite 310

San Diego, CA 92123

RE: GPA 12-004; SCH NO.2012081082; FCI Lands General Plan Amendment

We have lived in the Japatul Valley for generations and request RL-20 designation for our property. Our immediate neighbors to the West have one residence on 5 acres, the immediate neighbor to the North has one residence on 8 acres, and our neighbors to the East and North have larger parcels. We affected property owners in the Japatul Valley area have requested RL-20 designation, and oppose the Planning and Development Services blanket RL-40 proposed designation. The Alpine Community Planning Group has consistently supported our RL-20 request throughout the many meetings over the last several years on the FCI lands General Plan Amendment.

We respectfully request you grant us RL-20 designation for our property and home.

Danny Ervin 22273 Japatul Lane, Alpine, CA 91901

Robin Ervin 22273 Japatul Lane, Alpine, CA 91901

Sharon Haven Land Use Strategies
2904 Scenic view Road
Alpine, CA 91901

February 2, 2016

DEPARTMENT OF PLANNING AND DEVELOPMENT SERVICES

5510 Overland Avenue Ste. 310

San Diego, CA 92123

RE: APN 523-150-10; APN 524-031-19

Att.: Mr. Bob Citrano

TO WHOM IT MAY CONCERN:

In July 2012, The Alpine Community Planning Group voted decisively for the lands in the Japatul Valley requesting RL-20 to receive that classification in the new plan . They have never wavered in that position, despite taking several votes on the overall plan since that time. In fact, this is the only vote taken on the plan which received the unanimous vote of all present.

Dortheia Hinkle's 237 acre holding (APN 523-150-10 and 524-031-19) shown in the "Project Map", Figure 4-2.1A Mid Density Alternative for Alpine, and in Figure 4-3A of the Alpine Land Use Alternative Map, is one of these properties. It is located immediately adjacent to the Japatul Spur, and is in close proximity to sites developed at eight acre minimum and less. She had requested 20 acre minimum over her entire site.

In November of 2013, the SD County Planning Commission heard the Alpine Community Plan. They reviewed the Plan supported by the Alpine Community Planning Group, as well as the Staff Recommendation. In the case of Mrs. Hinkle's property, they recommended that the portion of her property, closest to the Japatul Spur (approximately 60 acres), be designated RL-20. Subsequently, in June 2014, the Board of Supervisors heard the various plan alternatives and was unable to make a decision at that time on this area. It was sent back to staff for more review.

Mrs. Hinkle is willing to accept the Planning Commission recommendation as shown in figure 4-3A as a compromise to her original request. She recognizes that the terrain above the recommended 60 acres is rougher and less developable. She personally believes that there are several landmarks on the property that would be more protected if the upper area was to remain largely undeveloped. She hopes to be able to cluster her allowable lots on the lower portion of her land. That area is without steep slope, and is without significant preservable habitat.

Sharon Haven Land Use Strategies
2904 Scenic view Road
Alpine, CA 91901

The Japatul Valley is an area that needs more development to remain viable. The Sunrise Powerlink devastated much of the Valley, and has left its definable mark. Areas such as Mrs. Hinkle's, with close proximity to a major circulation road and ample water, need to have the ability to expand the base of the Valley population and provide home sites that are of manageable size.

We support the Planning Commission recommendation as shown in the "Alternative Alpine Plan".

Sincerely,

Sharon Haven

Sharon Haven Land Use Strategies
2904 Scenic view Road
Alpine CA 91901

DEPARTMENT OF PLANNING AND DEVELOPMENT SERVICES

5510 Overland Avenue Ste. 300

San Diego, CA 92123

RE: APN(S) 524-040-03 and 524-040-02 February 15, 2016

"Alpine Land Use Map Alternative" Figure 4-3A

TO WHOM IT MAY CONCERN:

I represent Terry and David How in the matter of securing appropriate land use classifications for their property known as WINDFALL RANCH on Japatul Road. Ms Howe appeared before the Alpine Community Planning Group along with other land owners in mid 2012 to ask that their land be considered for 20 acre minimum. The Planning Group was extremely supportive, and in subsequent votes never wavered in nearly unanimous approval for that classification in that area.

The Howe property, in particular, is deserving of this classification because it is located on both sides of Japatul Road, providing more than adequate circulation with several opportunities to improve such circulation for the area in general. . On its northernmost boundary, Larry Road, it is neighbored by the 8 acre and smaller subdivision of Japatul Estates, while its western boundary is bordered by more small lots. There are no "dead end road" issues, and there is a positive effect to be gained for the area as a whole by allowing the 20 acre minimum classification over the entire property.

In November of 2013, the Planning Commission recommended approval for 20 acre minimum over 120 acres of the Howe holding, In June of 2014, the Alpine FCI lands were heard before the Board of Supervisors, and they were unable to make a final decision on this issue,

Although they still believe their land suitable for RL-20 overall, the Howes are will to accept the Planning Commission recommendation of 20 acre minimum on 120 acres of their land - - with the understanding that they qualify to cluster that density in appropriate areas of their parcel most suitable for development. This recommendation is demonstrated in the "Alpine Land Use map Alternative": Figure 4-3A.

Thank you for your attention to this matter.

Sharon Haven

Sharon Haven Land Use Strategies
2904 Scenic View Road
Alpine, CA 92001

DEPARTMENT OF PLANNING AND LAND USE

5510 Overland Ave. STE: 300

San Diego, CA 92123

RE: APNs 404-231-03 and 404-240-18 February 16, 2016

Attn: Mr. Peter Eichar

TO WHOM IT MAY CONCERN:

I have been working with the property owners, Staff, and the Alpine Community Planning Group on the reclassification of this land holding for several years. The immediate neighbors to the north (which this property wraps around) are in full agreement with the changes in classification. The property touches a very dense mobile home park on its' western side, and is immediately adjacent to the site of the proposed Alpine High School. Its eastern boundary is tangent to the West Willows off ramp.

The classification of VR-2 is entirely appropriate for the residential sector of this property. The recommendation of staff for 2.4 acres of Rural Commercial is also completely reasonable given the site's proximity to freeway ingress and egress.

The Alpine Mid Density Map and the Alpine Land Use Map Alternative both reflect the wishes of not only the property owner, but multiple positive votes from the Alpine Community Planning Group and the vote of the SD County Planning Commission. The property is within the Water Service Availability Area, and the owner has been paying property taxes for years because that benefit is available to them, though not presently in use. Sewer access is a reasonable distance away.

On behalf of the property owners, I support the findings of the SEIR on this property.

Thank you for your attention to my comments.

Sharon Haven

Sharon Haven Land Use Strategies
2904 Scenic View Road
Alpine, CA 92001

DEPARTMENT OF PLANNING AND DEVELOPMENT SERVICES

5510 Overland Ave. Ste. 300

San Diego, CA 92123

RE: APNs 404-042-05; 404-050-55; 404-231-02; 404-240-13

Attn.: Peter Eichar February 18, 2016

TO WHOM IT MAY CONCERN:

The above referenced APNs describe the property known as the Campbell Creek Ranch. It is located across Alpine Boulevard from property designated for Rural Commercial. It is immediately adjacent to densely developed mobile home property on its' western boundary, proposed Rural Commercial on its' eastern boundary, and proposed VR-2 on its' southern boundary.

It is within a few hundred feet of the property proposed for the new high school in Alpine. It is within the Water Service Area, and within a reasonable distance of prospective sewer service.

The Alpine Community Planning Group and the San Diego County Planning Commission have approved this property for exactly this classification. The Board of Supervisors reviewed these uses for this and other properties and voiced no disapproval at their July 25, 2014 meeting.

I support the Alpine Mid Density Map and the Alpine Land Use Map Alternative which show the above designations for this property.

Thank you for your consideration of my comments.

Sharon Haven

Janice C and Colin L Campbell
3535 Alpine Boulevard
Alpine, CA 91901-2301

February 18, 2016

Department of Planning and Development Services
5510 Overland Ave. Ste. 300
San Diego, CA 92123
Attn: Mr. Peter Eichar

Subj: Additional comments on the Forest Conservation Initiative (FCI) General Plan Amendment (GPA) Draft Supplemental Environmental Impact Report (SEIR) recirculated by the Planning & Development Services (PDS) in January 2016 on the reclassification of CAMPBELL CREEK RANCH, Augustyne-Kaderabek properties, and Alpine Oaks Mobile Estates.

Dear Mr. Eichar:

Our property, known in the community as Campbell Creek Ranch (CCR), 4040420500, 4040505500, 4042401300, 4042310200 is adjacent to the Alpine Oaks Mobile Estates, 4040420400, on our northwest, Alpine Boulevard to our north and surrounded by the Augustyne-Kaderabek holdings, 4042310300, 4042401500, to our east, south and west.

CCR is immediately adjacent to an intensely developed mobile home park and a few hundred feet from the anticipated site of our new High School, 4040420100, 4042310500. CCR is within the "Village Core" of Alpine and within the Water Service Area of the Padre Dam Municipal Water District. When the High School is constructed, sewer will also be within a reasonable distance of our site. We also support the proposed Rural Commercial designations for our northern neighbors across from us along Alpine Boulevard and the Augustyne-Kaderabek family near the West Willows off-ramp.

CCR could be a perfect site for future multi-family residential growth. We have a deep love and appreciation for this property and want to see it evolve in a manner that is appropriate to Alpine community needs while maintaining much of its wild, natural beauty. We fully approve the recommended SEIR VR-2 reclassification which has been consistently supported by the Alpine Planning Group, the San Diego Planning Commission and your PDS department over the past several years providing for responsible development and growth while preserving open space consistent with the San Diego County GPA.

We support the recommendation of PDS Staff as seen in both the Alpine Mid Density Map and the Alpine Land Use Map Alternative of the SEIR.

Thank you for your attention to our comments.

Sincerely,

Janice C Campbell

Colin L Campbell (Sr)

Alberto & Cynthia Arce
5615 Alpine Blvd
Alpine, CA 91901

February 24, 2016

Dear Members of the SD Board of Supervisors, Robert Citrano and Travis Lyon:

After reading the draft of the Supplementary Environmental Impact Report regarding the land use and zoning designations for the former FCI lands, my husband and I want to express our appreciation of the scope and depth of the report and the consistent and coherent vision and goals of the future regional growth of the county, based on the 10 guiding fundamental principles in the report. Over the past few years, we have attended many meetings of the Alpine Planning Group regarding land use designations for this area as well as the June 2014 meeting of the Board of Supervisors. We greatly appreciate the work of the BOS, Robert Citrano, and the current leadership of Travis Lyon of the APG in ensuring that the study for the General Plan Amendment based on land use designations has moved forward over recent months resulting in the SEIR draft.

As property owners of a 5-acre parcel on Alpine Blvd between Montecito Road and East Willows Road, we want to indicate our support for the SD County's "Proposed Project" in the SEIR and our rejection of both the "Mid-density Alternative" and the "Alpine Alternative Land Use Map." We believe that the "Proposed Plan" is the only plan that ensures a coherent and consistent plan for development of the area where our property is located. The County proposal for the land use designation here would increase population density by changing from the current SR-4 to SR-1. This would ensure that our property would be included in the expansion of water and sewer service areas required to serve the increased densities proposed. The "Alpine Alternative" would propose to maintain the current or existing General Plan zoning with densities of 1 dwelling unit per 4 acres, and to exclude our parcel and those around us from the benefits of development and the improvement of water quality standards as planned in the "Proposed Plan." As the report indicated, the alternative plan would be a "Violation of ground water quality standards by designating land uses that would be ground water dependent in areas currently exposed to ground water contamination." The County's proposed plan ensures access to quality water for all, which is essential in a consistent and coherent plan for the future development of this area.

A second observation and grave concern of ours is that, over the years, the current zoning here has resulted in a very unsafe environment. Due to inadequate roadway widths, many dead-end roads, many one-way roads, and gated communities, there is no emergency access in this area. There are junkyards, trash and other fire hazards up behind Montecito Road which epitomize the lack of safety here with no emergency access. In the absence of the benefits of the County's "Proposed Plan," we would continue to be unsafe when faced with a true emergency. Without the well planned roads and emergency access throughout San Marcos and Carlsbad, the 2014 & 2015 fires would have caused much greater damage and would have been much more challenging to contain. Ensuring the safety of all Alpine residents through well planned roads and emergency access is critical to us all.

After a thorough review of the SEIR Report, we want to express that we whole heartedly disagree with and reject the new alternative referred to in the draft as the "Mid-density alternative," where a few of our more vocal neighbors in the Montecito Road area propose "reduced densities on specific parcels to further reduce Project impacts associated with biological resources, fire hazards, increased urban unauthorized access, improvement to infrastructure, etc." Under the County's Proposed Plan, our neighbors' properties would be part of the larger plan, yet the owners would not have to subdivide and increase density on their land if they choose not to. The "Mid-density alternative, however, would exclude our properties from the benefits of the future development of all of Alpine and have a negative impact on the value of the land here. We believe that those who support the "Mid-density Plan" or the "Alpine Alternative Land Use Map" are not guided by the 10 sound principles and goals of the proposed future development of Alpine Blvd east of Viejas and south of interstate 8. This land must be included in the consistent and coherent vision for the future regional growth of San Diego County.

We hope to hear from you regarding our review of the SEIR, and we look forward to the future meeting of the Board of Supervisors regarding the land use designation of this area.

Sincerely,

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Cc: Dianne Jacob

Greg Cox

Dave Roberts

Ron Roberts

Bill Horn

Robert Citrano

Travis Lyon

ENDANGERED HABITATS LEAGUE
DEDICATED TO ECOSYSTEM PROTECTION AND SUSTAINABLE LAND USE

February 25, 2016

VIA ELECTRONIC MAIL

Peter Eichar
Dept. of Planning and Development Services
County of San Diego
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San Diego, CA 92123
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RE: 2016 Draft Supplemental Environmental Impact Report (SEIR) for the Forest Conservation Initiative (FCI) Lands General Plan Amendment (GPA 12-004)

Dear Ms. Eichar:

The Endangered Habitats League (EHL) appreciates the opportunity to comment on the Draft Supplemental Environmental Impact Report (SEIR) that was prepared for the County's proposed General Plan Amendment on about 72,000 acres of backcountry land previously zoned under the Forest Conservation Initiative (FCI). For your reference, EHL is Southern California's only regional conservation group. For over a dozen years, EHL worked collaboratively with the County and other stakeholders to develop a truly sustainable General Plan that accommodates growth while reducing public infrastructure costs and increasing conservation of San Diego's world-class biodiversity and scenic landscapes.

EHL submits that the proposed Project would create numerous significant adverse impacts that could be substantially lessened or avoided by adoption of the environmentally superior, Modified FCI Condition Alternative ("Modified Project"). As is explained in detail below, the California Environmental Quality Act (CEQA) contains a substantive mandate precluding adoption of a Project where feasible alternatives that achieve most project purposes and which avoid or substantially lessen significant environmental impacts exist. Because the environmentally superior Modified Project meets these tests, the County has no substantial evidence that no such alternative exists. It therefore cannot make the necessary findings that are a predicate to approve a Project with significant impacts via a finding of overriding considerations.

Indeed, the SEIR acknowledges that the Modified Project's reduced development intensity results in less modification of the landscape, "thus decreasing environmental impacts in *all* issue areas evaluated." (SEIR at p. S-7, emphasis added.) Moreover,

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because this alternative *fully* meets all Project objectives and in most cases *better* than the proposed Project—and no substantial evidence exists to support a contrary conclusion—CEQA *requires* its adoption in lieu of the proposed Project.

In the discussion below, we briefly summarize the stated Project objectives, the Project and environmentally superior Modified Project, the comparative impacts, and finally an evaluation of the uncontroverted evidence showing the Modified Project's superior ability to meet the Project objectives as compared with the Proposed Project.

Project Objectives

The Project objectives are the same as those of the County of San Diego General Plan:

- Support a reasonable share of projected regional population growth;
- Promote sustainability by locating new development near existing infrastructure, services, and jobs;
- Reinforce the vitality, local economy, and individual character of existing communities while balancing housing, employment, and recreational opportunities;
- Promote environmental stewardship that protects the range of natural resources and habitats that uniquely define the County's character and ecological importance;
- Ensure that development accounts for physical constraints and the natural hazards of the land;
- Provide and support a multi-modal transportation network that enhances connectivity and supports community development patterns;
- Maintain environmentally sustainable communities and reduce greenhouse gas (GHG) emissions that contribute to climate change
- Preserve agriculture as an integral component of the region's economy, character, and open space network;
- Minimize public costs of infrastructure and services and correlate their timing with new development; and
- Recognize community and stakeholder interests while striving for consensus.

In addition, the following two Project-specific objectives are added:

- Assign land use designations in a manner consistent with the Guiding Principles, Goals, and Policies of the adopted County General Plan.
- Assign land use designations that minimize conflicts with the U.S. Forest Cleveland National Forest Management Plan.

As is explained in detail below, every single one of these objectives is better or equally met by the Modified Project alternative.

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The Proposed Project

Nearly 2,000 additional dwelling units over the development quantity assumed in the 2011 General Plan Update would be added by the Project. (Table 1-1A.) Virtually all of these units would be spread out over the landscape in remote locations including in the Alpine, Central Mountain, Jamul/Dulzura, North Mountain, and Mountain Empire subregions. All of the affected 71,715 acres are located east of the County Water Authority line, and distant from infrastructure, services, public safety resources, and jobs. Indeed, FCI lands represent some of the most rugged, inaccessible areas in the County.

According to the SEIR, the Project would produce numerous significant unavoidable impacts. These include on Visual Character or Quality, Light or Glare, Direct Conversion of Agricultural Resources, Indirect Conversion of Agricultural Resources, Direct and Indirect Loss or Conversion of Forestry Resources, Air Quality Violations, Non-Attainment Criteria Pollutants, Sensitive Receptors, Special Status Species, Riparian Habitat and Other Sensitive Natural Communities, Wildlife Movement Corridors and Nursery Sites, Wildland Fires, Water Quality Standards and Requirements, Groundwater Supplies and Recharge, Mineral Resources Recovery Sites, Permanent Increase in Ambient Noise Level, Schools, Traffic and LOS Standards, Rural Road Safety, Adequate Water Supplies, Sufficient Landfill Capacity, Compliance with AB 32, and Effects of Global Climate Change on the Proposed Project. Only if no feasible alternatives meeting most Project objectives exist may the Project be approved consistent with CEQA.

Notable among the proposed changes is an expansion of the village in Alpine with urban densities around the Viejas reservation. This change is profound because it will involve the expansion of urban infrastructure further into the backcountry. The draft amended Community Plan for Alpine states:

> "Expansion of imported water and sanitary sewer services are necessary to accommodate the increased land use intensities identified on the Alpine General Plan land use map. More specifically, both imported water and sewer services are necessary to fully realize the land use intensities allowed by the Village land use designated areas along Willows Road east of Viejas and residential densities south of Alpine Boulevard between the Interstate 8 interchanges at West Willows Road and at the eastern end of Willows Road." (DEIR at p. 1-23.)

In addition, much the rugged former FCI lands would go from lower to higher density Rural and various Semi-Rural densities. There are some locations where the Semi-Rural designations make sense due to existing parcelization. In other areas, however, intact parcels of 40 and 80 acres and larger are being designated at higher Rural and even Semi-Rural densities (for example in Alpine). In comments on the NOP for the Project, EHL articulated several examples of such density increases:

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Alpine: The area of 1:10 south of Abrams Ridge should change to 1:20. South of the Commercial district and south of Old Ranch are three large blocks of unparcelized land that should be 1:40 or 1:80 rather than 1:10. In the area of Fusco, Burdoaks, Old Ranch and Granite Vista there should be a 1:20 density rather than 1:10. Note: This last area may be in Descanso. Note: There are two "Old Ranch" roads in different parts of the map.

Lake Moreno/Campo: The "square" immediately south of the town center, labeled SR-10, should be RL-20.

Descanso: The area around Verna Road should be 1:20 rather than 1:10. The area around Old Ranch, South Forty, Campbell Ranch, and Granite Vista should be 1:20 rather than 1:10. South of the Commercial district and south of Old Ranch are three large blocks of unparcelized land that should be 1:40 or 1:80. (Note: This last area may be in Alpine.)

North Mountain: On the inset map, lands northeast of the village should be RL-20 or RL-40 rather than SR-10.

Notably, neither the SEIR nor Origins of the Forest Conservation Initiative Lands GPA Project Alternatives articulates *any* planning rationale or rationale based on the Guiding Principles for these shifts to Semi-Rural in the backcountry.

Nor is there any response in the SEIR to the compelling planning rationales EHL articulated in its comments on the NOP for maintaining low rural densities in these remote, rugged areas. For this reason, EHL repeats it here:

> "Forest inholdings are generally remote locations, removed from urban services and urban infrastructure, with high ecological integrity and high fire risk. Therefore, intensities of use (as reflected in assigned densities) should be at the *lowest* levels the Land Use Element allows, consistent with underlying parcelization. In other words, the number of potential new parcels should rarely increase above the baseline number of parcels, and then only in locations already substantially committed to such parcelization, so as to avoid "spot zoning." Mere adjacency to areas of existing higher density, or proximity to a roadway, is *not* sufficient rationale for up-planning. The needs to reduce fire hazard, preserve the environmental, and reduce service costs remain paramount. The current General Plan's limits of estate, semi-rural, and village development should be respected. Absent a demonstrable objective need to increase the housing capacity of the General Plan, there should be *no* expansion of Village or Semi-Rural densities into the former FCI lands. A density of 1:40 or less dense should be the default *unless unique circumstances compel otherwise.*" (EHL NOP Comments, Appendix B.)

The flaws in the Project are most clearly seen in Alpine 5, 6, 7, and 8. Indeed, Alpine can be fairly described as a planning disaster.

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AL 5

Semi-Rural densities of SR-1, SR-2, SR-4, and SR-10 are shown over large portions of 696 acres. These lands are constrained by prime agriculture, National Forest adjacency, high fire risk, lack of water and access, high biological value, and adjacency to National Forest. Existing parcelization does not justify Semi-Rural categories, and similarly unparcelized lands just to the east (and indeed, throughout the County) are designated Rural, creating inequities. Numerous General Plan Guiding Principles and Land Use Policies are violated. Land designated in the Project as Semi-Rural actually contains existing lots of 40 to 80 acres in size. *The proper designation is RL-20 or RL-40.* Subdivision of intact, relatively remote land into dispersed estate lots would place more residences at fire risk, fragment habitat, increase service costs, and increase GHG emissions for the resulting long-distance commuters.

These proposed designations *blatantly and irretrievably* violate the following Planning Criteria ostensibly used by staff to assign densities for the FCI Amendment:

> *b) Consistency with existing parcel size – Outside of villages and the County Water Authority boundary, Semi-Rural 10 or Rural Lands 20 land use designations are assigned only when the predominant parcel size is similar (10 to 20 acres) and would result in little to no additional subdivision potential.* To the contrary, the proposed SR-1, SR-2, SR-4, and SR-10 are not similar in size to the predominant parcels in these outside-Village and outside-CWA locations.
>
> *c) Reduced development adjacent to CNF lands – Lower land use designations are assigned adjacent to the CNF lands to reduce density in the Wildland/Urban Interface. Additional development in this area increases the likelihood of human-caused wildland fires, requires a greater commitment of resources to manage buffers between the CNF and developed areas, and increases the need for additional infrastructure and services in CNF lands.* The proposed SR-1, SR-2, SR-4, and SR-10 place Semi-Rural adjacent to the CNF across a broad interface, where fire history shows *repeated* conflagrations.
>
> *d) Reduced development in areas with sensitive biological resources – Lower density residential designations are assigned in areas with high value biological resources to avoid these sensitive resources.* Significant portions of the proposed SR-2, SR-4, and SR-10 and even some SR-1 have "high" biological value.
>
> *e) Reduced development in areas without adequate access – Lower densities are assigned in areas that are one-half mile or more from public roads.* Except for a portion of SR-1, virtually all the SR-2, SR-4, and SR-10 in the Project is more than one-half mile from public roads.
>
> *f) Reduced development in areas with physical constraints – Lower densities are assigned in areas dominated with slopes greater than 25%.* Portions of the

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proposed SR-1 and proposed SR-2 are slope constrained.

AL-6

Lands designated SR-1 and SR-2 over portions of 427 acres are constrained by very high fire risk, biology, wetlands, slope, and adjacency to public lands. Rural densities here are appropriate unless already parcelized. However, the Project errs in designating unparcelized land for estate subdivision when it should be RL-20 or RL-40. Planning Critieria b, c, d, e, and f are all violated to various extents, such as in placing Semi-Rural adjacent to the Cleveland National Forest and in placing even SR-1 more than a half mile from a public road. Such special treatment for these property owners would create inequities. Subdivision of intact land into estate lots would place more residences at fire risk, fragment habitat, increase service costs, and increase GHG emissions for the resulting long-distance commuters.

AL-7

While part of AL-7 is properly designated as Rural, SR-10 improperly appears over portions of 360 acres. Consistent with the Planning Criteria, and due to numerous constraints including high fire risk, slope, biology, wetlands, water, and limited access, these properties should be RL-40.

AL-8

The RL-20 in the Project is improperly placed over large expanses of unparcelized and highly remote land with high fire risk, National Forest adjacency, biological value, agriculture value, and slope, water, and access constraints. These unparcelized properties should given densities at the bottom of the range, namely, RL-40 or RL-80. Dead-end road lengths for fire safety are also exceeded. Planning Critieria b, c, d, e, and f are all violated.

No "unique circumstances" grounded in the Guiding Principles have been articulated in the Project or the accompanying SEIR to justify Alpine's gross departures. The high degree of inconsistency with the Planning Criteria – which in turn simply embody General Plan Guiding Principles, Goals, and Policies – is truly astounding.

Greenhouse Gas (GHG) Impacts

The density increases in the Project and indeed all the alternatives (much less so for the Modified Project) are contrary to the 2011 General Plan's goal of reducing development in more remote, GHG-intensive locations. A major expansion of the Alpine Village is highly adverse for GHG emissions, as this new development will create long distance commutes to jobs and activity centers absent any sort of transit capacity.

Besides this inconsistency with the General Plan, the Project is inconsistent with the SANDAG RTP/SCS. This is because the latter relies on the "smart growth" land use

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designations of the 2011 General Plan for all of its assumptions and outcomes and does not contemplate additional rural residential density or major Village expansion *a la* Alpine. The County should not undermine the RTP/SCS through the FCI and, in the SEIR, all such impacts on regional planning should be properly analyzed. In doing so, the DEIR should follow recent court guidance regarding use of a "business as usual" comparison approach (*Ctr. for Biological Diversity v. Dept. Fish & Wildlife*, 62 Cal. 4th 204 (2015)) as well as evaluate consistency with gubernatorial Executive Orders on climate change.

The County's Climate Action Plan (CAP) was invalidated due to the absence of enforceable mechanisms to reduce GHG emissions. Yet, the CAP was an integral part of the General Plan. It is difficult to understand how or why the County would amend its General Plan via the GHG-intensive Project absent first knowing where it is going in terms of addressing climate change. Indeed, absent a valid CAP, it may not be legally permissible to amend the plan in such a major way.

EHL therefore urges the County should adopt a legally valid revised CAP *prior to* the FCI Amendment. Otherwise, this GPA will face the twin burdens of 1) General Plan consistency when an important component of that plan – the CAP – is no longer valid and 2) providing alternative enforceable mechanisms for GHG reduction, as the invalidated CAP did not.

The Environmentally Superior Modified Project Alternative

The Modified Project alternative is less intensive than the proposed Project and would result in less environmental impacts. This alternative would support build-out of approximately 4,521 residential dwelling units, or approximately 1,724 less than the proposed Project. (Table 4-4) When compared to the proposed Project, this alternative would primarily involve the re-designation of Semi-Rural lands (SR-10) and Rural lands (SR-20) to the lowest density rural land use designations allowed by the General Plan (SR-40 and SR-80), thereby increasing the amount of Rural lands by 2,952 acres as compared to the proposed Project. (Table 4-2)

CEQA's Substantive Mandate

CEQA outright prohibits the City from approving projects with significant environmental effects if there are feasible alternatives or mitigation measures that can "avoid or substantially lessen" those effects. (Pub. Resources Code § 21002.) This substantive mandate operates through a series of required findings that *must* be made and supported with credible, substantial evidence.

Specifically, before the County may approve a project with significant environmental impacts, a lead agency must make two sets of findings under CEQA. The first must address how the agency responds to significant effects identified in the environmental review process, either by finding that these effects will be mitigated, or that "[s]pecific economic, legal, technological, or other considerations . . . make

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infeasible the mitigation measures *or project alternatives* identified in the final EIR." (CEQA Guidelines § 15091, subd. (a)(3).) The second set concerns any statement of overriding considerations, permitting an agency to approve a project despite the existence of significant environmental impacts. (CEQA Guidelines, § 15093.)

Because the findings requirements implement CEQA's substantive mandate that public agencies refrain from approving projects with significant environmental impacts when there are feasible alternatives or mitigation measures that can lessen or avoid these impacts, an agency is prohibited from reaching the second set until it has properly addressed the first. (See CEQA Guidelines, § 15091, subd. (f), subd. (c); *Mountain Lion Foundation v. Fish & Game Commission* (1997) 16 Cal. 4th 105, 134.)[1]

These findings must be supported by substantial evidence in the record. (Pub. Res. Code § 21081.5; CEQA Guidelines, § 15091, subd. (b).) Any finding that an alternative is infeasible must not only reflect a reasoned analysis, but must be based on specific and concrete evidence. For example, in *Citizens of Goleta Valley v. Board of Supervisors* (1988) 197 Cal.App.3d 1167, the court rejected a finding of infeasibility of alternatives based on conclusory assertions of unacceptable cost, noting that:

> "The fact that an alternative may be more expensive or less profitable is not sufficient to show that the alternative is financially infeasible. What is required is *evidence* that the additional costs or lost profitability are sufficiently severe as to render it impractical to proceed with the project." (Id. at p. 1181.)

Only if this finding of infeasibility can properly be made may a lead agency rely on a statement of overriding considerations.

Here, as explained below, the Modified Project outperforms or is equal to the proposed Project or any of the other project alternatives considered in meeting every stated project objective, and no substantial evidence exists to support a finding of its infeasibility. Pub. Res. Code §21082.2(c) (Substantial evidence excludes "[a]rgument, speculation, unsubstantiated opinion or narrative, [and] evidence which is clearly inaccurate or erroneous…"); *see also Californians for Alternatives to Toxics v. Dept. of Food & Agric.* (2005) 136 Cal.App.4th 1, 17 ("[C]onclusory statements do not fit the CEQA bill.").

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[1] While the purpose of an EIR is an analysis of environmental effects, the EIR must study a range of potentially feasible alternatives that will foster "informed decision making and public participation." (Pub. Res. Code §15126.6(a).) "Feasible" is defined as "capable of being accomplished in a successful technological factors." (Pub. Res. Code §21061.1, emphasis added.) Since the lead agency further has the responsibility to "find out and disclose all it reasonably can" (14 Cal. Code Regs. section 15144), including "sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project" (14 Cal Code Regs. section 15126.6(d)).

As is demonstrated below, the only alternative for which these required findings may be made is the environmentally superior, Modified Project alternative.

The Modified Project Alternative Would Better or Equally Meet Every Stated Project Objective and Cause Substantially Less Impacts in All Issue Areas Evaluated

The County in the SEIR has already acknowledged that the Modified Alternative would "decreas[e] environmental impacts in *all* issue areas evaluated." (SEIR at p. S-7, emphasis added.) It therefore cannot be subject to reasonable dispute that adoption of the Modified Project alternative would "substantially lessen" those impacts within the meaning of CEQA's substantive mandate. (See Pub. Resources Code § 21002; Guidelines §§ 15021(a)(2), 15126.6(b); (*City of Marina v. Bd. of Trustees of the California State Univ.* (2006) 39 Cal. 4th 341, 350.)

The Modified Project alternative would also more fully meet every stated Project objective and therefore more faithfully implement the adopted General Plan's Guiding Principles. The following discussion addresses each objective:

Support a reasonable share of projected regional population growth

The Project would contain 6,245 units at build-out. (Table 4-4) The Modified Project has 4,521 units. The reality is, however, that *none* of this growth is needed to accommodate regional population growth, because the Draft Map analyzed during the 2011 General Plan Update, which contains significantly less growth than the adopted general plan, *already* accommodated anticipated regional growth. Adding growth on top of this actually *undermines* General Plan objectives. EHL made this point persuasively in its comments on the PEIR for the Update.[2] For this reason, the Modified Project actually outperforms the Project on this objective.

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[2] "In a DPLU staff analysis of the ability of the Draft and Referral Maps to meet Plan Update objectives, planners concluded that the Draft Map fully met regional growth objectives, coming in slightly over the target population. (See *Land Use Scenario Comparison*, May 2004.) Maps significantly exceeding the population target, i.e., by 2 to 3%, were deemed inferior, since the additional growth in unincorporated areas was inconsistent with other planning objectives: "Scenarios within 2 to 3 percent of the County's target population are evaluated as "meeting" [the population] objective. Higher populations were not because additional capacity increases costs for both infrastructure and essential services." (See *Land Use Scenario Comparison*, May 2004, p. G-2, footnote.)

According to County staff, "All Board Referrals scenarios [i.e., the proposed project] add unnecessary population capacity" and thus do *not* meet the goal of accommodating a *reasonable share* of growth. (See *Land Use Scenario Comparison*, May 2004, p. G-3.) For this reason, staff concluded in a May 2004 analysis that the "April 2004 Working Copy Map [precursor to the Draft Map] best meets GP2020 [Update] project objectives and the Board-endorsed planning concepts, Land Use Framework, and Draft Goals and Policies." (See *Land Use Scenario Comparison*, May 2004, p. G-3) Staff further noted that:

> "[a]ll Board referrals scenarios contain some residential designations that do not fit the proposed GP2020 planning principles. Including these exceptions could jeopardize the

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Promote sustainability by locating new development near existing infrastructure, services, and jobs

The SEIR acknowledges that by increasing densities (relative to the Modified Project) in remote forest in-holdings, the Project undermines this objective relative to the Modified Project.

Reinforce the vitality, local economy, and individual character of existing communities while balancing housing, employment, and recreational opportunities

Both the Project and the Modified Project will increase the number of local residents who use local businesses. However, by adding excessive Village residential development in the community of Alpine, the Project will create mobility issues and thereby adversely impact the character and vitality of this local community. While the Modified Alternative that EHL supports does not have the expanded Village Residential and Commercial component of the Project, there is no showing that this addition will provide a net benefit to the existing community of Alpine. Even if it did, less impactful alternatives that would impede attainment of project objectives to some degree should not be rejected as infeasible. (Guidelines § 15126.6(b).)

Promote environmental stewardship that protects the range of natural and habitats that uniquely define the County's character and ecological importance

The SEIR acknowledges that the Project will further fragment and degrade the high habitat values of these remote and biologically intact in-holdings. The designations denser than 1:40 du/acre are particularly fragmenting to habitat, and the Project contains a much higher proportion of these land use designations in sensitive, remote areas relative to the Modified Project.

Ensure that development accounts for physical constraints and the natural hazards of the land

The critical natural hazard in the FCI areas is fire risk. By increasing the densities and number of units in these remote and rugged high-fuel areas relative to the Modified Project, the Project strongly undermines this goal on a relative basis.

Provide and support a multi-modal transportation network that enhances connectivity and supports community development patterns

While neither the Project nor the Modified Project provide land use configurations that support multi-modal transportation, the lower unit count of the

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planning principles used to develop the GP2020 maps." (See *Land Use Scenario Comparison*, May 2004, p. G-2, footnote.)

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Modified Project reduces the overall number of units in locations inaccessible to transit relative to the Project.

Maintain environmentally sustainable communities and reduce greenhouse gas (GHG) emissions that contribute to climate change

Neither the Project nor the Modified Project provides land use configurations that reduce automobile trips. Both permit additional housing in far-flung locations distant from jobs and services. However, the lower unit count of the Modified Project compared to the Project reduces the overall number of units in locations that would generate long commutes and trip to distant services, thereby causing less GHG emissions on a relative basis. Largely but not exclusively due to Alpine, there are huge increases in VMT and resulting GHG emissions in the Project compared to the Modified Project. According to Tables 4-8 and 4-12, there are about *5 times* as much mobile source emissions in the Project versus the Modified Project, and about *5 times* the amount of new average daily traffic generation (114,264 compared to 21,674).

Preserve agriculture as an integral component of the region's economy, character, and open space network

The former FCI lands contain little agricultural activity. To the extent that it does, however, the lower overall densities of the Modified Project relative to the Project will better preserve existing and future agricultural development opportunities.

Minimize public costs of infrastructure and services and correlate their timing with new development

Both the Project and the Modified Project would designate development in highly remote locations that are highly expensive to provide with infrastructure and emergency and other public services. However, the lower unit count of the Modified Project compared to the Project reduces the overall number of units requiring service and infrastructure in remote locations.

Recognize community and stakeholder interests while striving for consensus

The FCI GPA process is a continuation of the extensive public outreach process that resulted in the Update. While there are elements of the community and stakeholders in support of all the alternatives, it is important to remember that key stakeholders (including EHL and the Forest Service) as well as members of the community throughout the County firmly believe in the Project objectives incorporated in the General Plan and wish to see them followed.

While it is impossible to say definitively what the relevant community is, much less poll its feelings on the various alternatives, neither local landholders nor even a specific local community can conclusively represent the broader county public interest that should guide the County-wide General Plan process. The community and

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stakeholders are best served by even-handed and objective application of the General Plan Guiding Principles to specific areas and problems presented. For this reason, and because the Modified Alternative most closely adheres to the vast majority of these Principles, the Modified Alternative is the best expression of community and stakeholder interests considered as a whole.

Assign land use designations in a manner consistent with the Guiding Principles, Goals, and Policies of the adopted County General Plan

The 2011 General Plan assigned Rural densities in locations with high fire hazard, high habitat values, and/or lack of infrastructure and services. Exceptions to these Guiding Principles, Goals, and Policies occurred where existing parcelization precluded such Rural designations. Inconsistent with the practices of the 2011 General Plan, the Project – particularly but not exclusively in the hillsides of Alpine in AL 5, 6, 7, and 8 – assigns Semi-Rural or R-20 densities absent existing parcelization. Such mis-assignment treats parcels elsewhere in the County but with similar characteristics differently, creating inequities among property owners. The Modified Project is markedly superior in assigning Rural densities in a manner consistent with the Guiding Principles, Goals, and Policies of the adopted General Plan.

To take one specific policy example, reducing fire hazard was a prime determinant of general plan densities. LU-6.11 states,

> "Protection from Wildfires and Unmitigable Hazards. Assign land uses and densities in a manner that minimizes development in extreme, very high and high fire threat areas or other unmitigable hazardous areas."

The carpeting of extremely fire prone hillsides in Alpine – *with histories of multiple burns* – with Semi-Rural densities is a flagrant and inexcusable violation of the policy to minimize such inherently dangerous development. To the contrary, the Modified Alternative places appropriate Rural densities in these locations. Throughout the rest of the County, Rural densities were applied to high fire risk lands. The Project would create glaring and, indeed irresponsible, exceptions.

Assign land use designations that minimize conflicts with the U.S. Forest Cleveland National Forest Management Plan

The United States Forest Service, in its comment letters, clearly identifies densities higher than the lowest Rural categories as creating conflicts with Forest management. Higher densities of human use and associated roadways are directly related to fire starts, a grave threat to the Cleveland National Forest. Greater adjacent density causes more human intrusion with adverse effects on wildlife and greater management costs. Landscaping leads to invasive plant and animal species. The Modified Project follows Forest Service recommendations – particularly but not exclusively in Alpine – far more closely and minimizes conflicts relative to the Project and the other alternatives.

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The Alpine Alternative Is Similarly Flawed

In the Alpine Alternative, the linear Village is extended eastward as in the Project, but otherwise the Study Area of Alpine 5, 6, and 7 retains "existing General Plan" densities (Semi-Rural and Rural). Ultimate planning would await economic studies, although such economic factors should not be determinative. Also, for Alpine 8, a split designation of RL-40 and RL-20 is applied rather than the Project's uniform RL-20.

For the same reasons described above, the lower densities of the Modified Project are both superior and feasible compared to the higher densities of the Alpine Alternative. Indeed, staff's own description of the constraints and hazards of these locations in its 2014 report to the Board of Supervisors – quoted below with emphasis added – paints a grim picture, particularly in terms of repeated wildfire conflagrations. Development at other than rural densities is the height of irresponsibility.

> *The southeastern parcels (AL-7) contain steep slopes that exceed 25% (refer to Figure 1 above). Very High and High Sensitivity Biological Habitat associated with wetlands and oak woodlands are located primarily in the southern portions of the area (refer to yellow and pink areas in Figure 3 above).* ***The entire area is located within the Very High Fire Hazard Severity Zone and contains some areas that have burned five or more times in the past 90 years*** *(refer to Figure 4 above). In addition, the entire area is groundwater dependent with a five-acre minimum lot size per the County Groundwater Ordinance.*
>
> *Alpine AL-8 contains 23 parcels that range in size from 4.7 to 355 acres for a total of 1,748 acres. Currently, this area of consideration is sparsely developed with some agriculture and support structures. The area is located approximately 2.3 miles east of Loveland Reservoir along Japatul Valley Road and Japatul Road approximately 3.7 miles southwest of Interstate 8. AL-8 is outside of the County Water Authority boundary and surrounded by the Cleveland National Forest (CNF) in a federally-designated wilderness area. Portions of the area are constrained by steep slopes (refer to Figure-1). Also, approximately one-third of AL-8 is more than one-half mile from the nearest County maintained road (refer to Figure- 2). This area contains approximately 131 acres of High Value Biological Habitat (refer to Figure-3). Some properties contain farmland of local importance, grazing land and prime agricultural land.* ***Nearly all of the parcels are located within the Very High Fire Hazard Severity Zone with some areas of AL-8 burning up to four times in the past 90 years*** *(see Figure-4).*

The Alpine Alternative Could Be Improved

Regarding Alpine 8, due to fire hazard and other constraints, and consistent with the way similar areas in the 2011 Update were treated, these remote lands should all be designated at RL 40 or 80. The split designation in the Alpine Alternative, with 49 units, is a compromise only preferable by virtue of comparison with the Project, which contains

fully *double* the build-out units of the Modified Project (80 vs 40) in this area of extreme fire hazard.

For Alpine 5, 6, and 7, there are two practical ways to reconcile, or significantly reconcile, environmental concerns that should be analyzed as alternatives in the SEIR:

1) Transfer of development rights

The enormous up-planning of the Village creates a unique and obvious opportunity for a *transfer of development rights program* within this finite and circumscribed area. Units outside of the Village in excess of Rural densities would be purchased by those obtaining the windfall of up-planning. The baseline for assigning transferable units would be the existing General Plan corrected for slope constraints.

2) Study Area boundary modification

Shrinking the proposed Study Area could minimize its most egregious flaws. Specifically, the Village and immediately adjacent areas would be retained for future study. However, the more remote, southerly portions – those most threatened by fire and those most important for National Forest land use compatibility – would be properly designated as Rural *at this time*. This option – called the Modified Alpine Alternative and further described below – is both superior and feasible from a CEQA perspective.

Modified Alpine Alternative

The great majority of the Project's defects arise in Alpine, particularly in Alpine 5, 6, 7, and 8 where Semi-Rural densities are wrongly applied and where a Village expansion greatly increases vehicle trips and GHG emissions. The "Alpine Alternative" would "white hole" the non-Village part of Alpine 5, 6 and 7, retaining old General Plan densities pending infrastructure and service studies. Alpine 8 would revert to a "compromise" of densities advanced by the Planning Commission.

EHL suggests also considering a *variation* on the Alpine Alternative which corrects the worst mis-applications of Semi-Rural designations while, logically, leaving study options open for the Village and immediately adjacent locations. Lower Rural densities would be applied in the more southerly tiers of parcels, corresponding to those with greatest impacts on the Forest and those most distant from the Village. The Study Area would be retained for the Village location, immediately adjacent lands, and for already parcelized locations. In this way, the most severe Guiding Principles, Goals, and Policies inconsistencies would be remedied at this time, improving fire safety, Forest compatibility, and habitat values. Simultaneously, the areas most appropriate for Village expansion, and potentially for immediately adjacent Semi-Rural use, would remain for future study per prior Board direction. This option would retain the Alpine 8 compromise. An example of this variation is shown on the accompanying *Modified Alpine Alternative* exhibit, where the retained and reduced Study Area is hatched and

appropriate Rural designations are applied to the southerly tiers of the original Study Area.

While not as environmentally beneficial as the Modified Project, the Modified Alpine Alternative is nevertheless a pragmatic option that would allow the County to pursue planned future studies along a far more responsible – and CEQA-compliant – course than the original Alpine Alternative.

Conclusion

The above discussion demonstrates that the Modified Alternative not only substantially lessens virtually all the significant impacts of the Project and it better satisfies the overwhelming majority of Project objectives. It is well settled that "[i]f there are feasible alternatives or feasible mitigation measures that would accomplish *most* of the objectives of a project and substantially lessen the significant environmental effects of a project subject to CEQA, ***the project may not be approved without incorporating those measures***." (*Center for Biological Diversity, Inc. v. FPL Group, Inc.* (2008) 166 Cal.App.4th 1349, 1371 fn 19, emphasis added, [citation to Pub. Resources Code §§ 21000(g), 21002, Guidelines § 15091].) For this reason, CEQA requires adoption of the Modified alternative or something very closely resembling it.

Thank you for your attention to EHL's concerns and we look forward to continuing to work with the County on a sustainable and legally defensible General Plan.

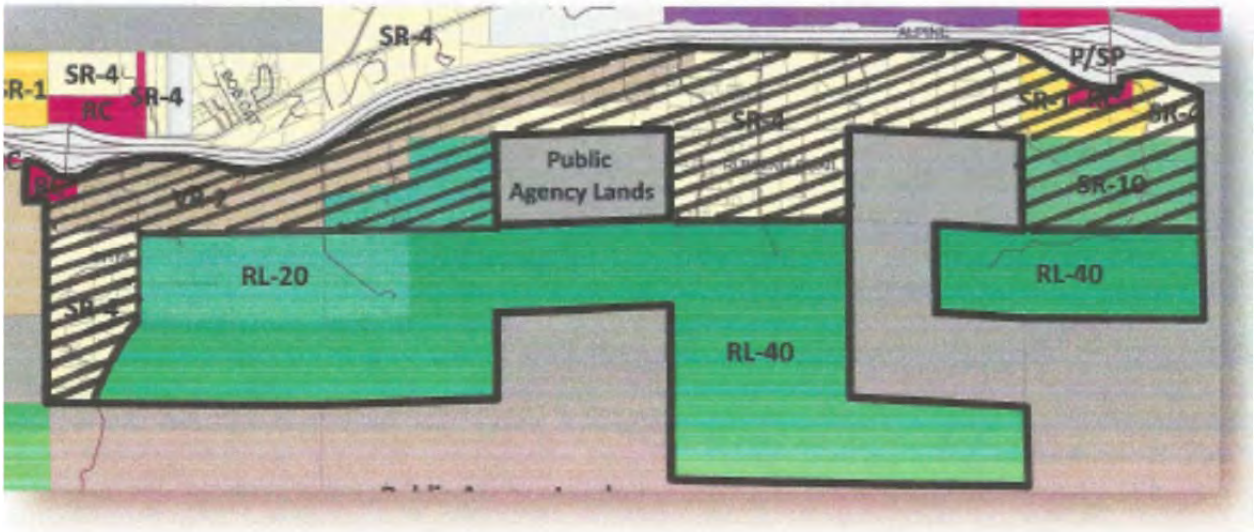
Very truly yours,

Dan Silver
Executive Director

Enclosure

Modified Alpine Alternative

Modified Alpine Alternative



Reconfigured Study Area

Sharon Haven
Land Use Strategies

DEPARTMENT OF PLANNING AND DEVELOPMENT SERVICES
5510 Overland Ave. Ste. 300
San Diego, CA 92123

RE: APN 404-073-09 McCall Property

Att.: Peter Eichar February 25, 2016

TO WHOM IT MAY CONCERN:

I have been working with Ms. McCall for several years to find an avenue that would allow her to develop the historic cottages on her 4+ acre parcel into an Artist's Colony.

She has owned the property since the late 70's, and her only recourse until now has been to rent them as residential units. The noise study she commissioned in 2013, done by Rick Tavares of ISE stated that "future noise would completely inundate the site and, in some cases, would exceed the 75-dBA "no residential build" standard. Given this, it is not unreasonable from an acoustical perspective to develop the site…as a commercial use, since uses of this type are typically classified as insensitive, or non sensitive to noise."

Mrs. McCall would have greatly preferred the classification of Rural Commercial. However, she has been persuaded that the county will stand by its commitment to support the "special zoning designation" in SR-4 that will allow her to proceed with the development of her Colony. It is, and has always been, her intent to pass on the management of this unique piece of Willows history to her many nieces, who also testified at the Planning Commission as to the family interest in pursuing her dream.

To the extent that the SEIR does not extend to the "special designation" zoning, I can only say that we look forward to hearing that that is a definite part of the presentation to the Board of Supervisors.

Thank you for your attention to my comments.

Sharon Haven

2904 Scenic View Road, Alpine CA 91901
619-985-5665 zinfann@cox.net

Sharon Haven
Land Use Strategies

DEPARTMENT OF PLANNING AND DEVELOPMENT SERVICES
5510 Overland Ave. Ste. 300
San Diego, CA 92123

RE: Japatul Valley lands on Japatul Lane Owners Borchard, Beale, and Ervin

Attn: Mr. Peter Eichar
cc. Supervisor Dianne Jacobs

February 25, 2016

TO WHOM IT MAY CONCERN:

I must oppose the SEIR recommendation of RL-40 on these particular Japatul Valley lands. The property owners are not asking for anything outside the boundaries of the county's own regulations

Criteria approved in the recent General Plan Update regarding "dead end roads" specifically allow 20 acre minimum to a distance of a mile from a county maintained road. All of these properties qualify under that ruling.

In addition, they are in close proximity, and in many cases adjacent to, homes on eight acres and less. The topography is gently rolling. There is plenty of water.

Most importantly, we are not talking about a lot of homes. Mary Kay Borchard's property, under this scenario, would have a maximum of 2 more homes. The other owners would cumulatively gain no more than 6 homes over the span of nearly 200 acres.

The impact to this area from the Sunrise Powerlink was devastating. Even now, its' towers loom over the top of the Borchard property. Rural blight in situations such as this is a significant problem. The inability to sell one's property for value adds to this situation.

I strongly hope that you will reconsider your recommendation. I know that the property owners stand ready to entertain any suggestions you might have, even including restrictive measures and clustering to preserve more open space.

Thank you for your attention to my comments.

Sharon Haven

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State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
South Coast Region
3883 Ruffin Road
San Diego, CA 92123
(858) 467-4201
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EDMUND G. BROWN JR., Governor
CHARLTON H. BONHAM, Director

February 26, 2016

Mr. Robert Citrano
Environmental Planner
County of San Diego
5510 Overland Avenue, Suite 110
San Diego, CA 92123
Robert.Citrano@sdcounty.ca.gov

Subject: Comments on the Draft Supplemental Environmental Impact Report for the Forest Conservation Initiative Lands General Plan Amendment, General Plan Amendment 12-004 (SCH# 2012081082)

Dear Mr. Citrano:

The California Department of Fish and Wildlife (Department) has reviewed the above-referenced draft Supplemental Environmental impact Report (SEIR) for the Forest Conservation Initiative Lands General Plan Amendment (Proposed Project). The County requested comments on the SEIR by February 29, 2016. The following statements and comments have been prepared pursuant to the Department's authority as Trustee Agency with jurisdiction over natural resources affected by the project (California Environmental Quality Act, [CEQA] Guidelines § 15386) and pursuant to our authority as a Responsible Agency under CEQA Guidelines section 15381 over those aspects of the proposed project that come under the purview of the California Endangered Species Act (Fish and Game Code § 2050 *et seq.*) and Fish and Game Code section 1600 *et seq*. The Department also administers the Natural Community Conservation Planning (NCCP) program (Fish and Game Code § 2800 *et seq.*). The County of San Diego (County) participates in the NCCP program by implementing its approved Multiple Species Conservation Program (MSCP) Subarea Plan (SAP), herein referred to as the South County MSCP (SCMSCP). Many of the former Forest Conservation Initiative (FCI) lands are located within the County's draft North County and East County MSCP (NCMSCP and ECMSCP, respectively) planning areas, which are at various level of development and not yet adopted. According to the FCI lands General Plan Amendment (GPA) documentation provided, some lands within the Alpine Community Planning Area occur in the County's existing permitted SCMSCP planning area.

The Proposed Project involves a GPA to the current San Diego County General Plan, based on the General Plan Update that was adopted on August 3, 2011. The proposed GPA would change the land use designations for approximately 71,700 acres of former FCI lands, which expired on December 31, 2010. The affected lands are comprised of privately-owned lands in and around the Cleveland National Forest within County

unincorporated community planning areas and subregional planning areas (e.g., Alpine, Central Mountain, Desert, Jamul/Dulzura, Julian, Mountain Empire, North Mountain, Pendleton/De Luz, and Ramona).

Additionally, the Proposed Project involves changes in land use designations for approximately 400 acres of private lands adjacent to former FCI lands to ensure that the uses anticipated for these lands are consistent with the changes proposed for the former FCI lands. The GPA would include removing the FCI Appendix from the General plan; amending the Alpine Community Plan; amending the Central Mountain, Jamul/Dulzura, and North Mountain Subregional Plans; and amending the County Zoning Ordinance with new zoning designations to ensure consistency with the GPA.

The Department appreciates the County's draft responses to our prior March 18, 2013, draft SEIR comment letter which incorporated many of our recommendations for the Forest Conservation Initiative Lands General Plan Amendment. Revisions to the Proposed Project (as originally circulated in 2013) have prompted the County to recirculate the current SEIR document including revised land use designations, Community/Subregional Plan revisions, a revised General Plan Mobility Element, and cumulative effects analysis. According to the project description "t[T]he proposed Project tiers from the San Diego County General Plan and the General Plan Update Program EIR (PEIR) adopted on August 3, 2011...."

We offer the following comments and recommendations to assist the County in avoiding, minimizing, and adequately mitigating project-related impacts to biological resources, and ensure that the Proposed Project is consistent with the County's adopted South County MSCP and ongoing regional habitat conservation planning efforts:

1. The Department is concerned with aspects of the Proposed Project that may affect implementation and coverage of species under the adopted SCMSCP, and affect the ability to cover species in the future NCMSCP and ECMSCP. Specifically, we are concerned with the potential for project-related increases in development densities to affect lands within the SCMSCP Pre-approved Mitigation Areas (PAMA), draft NCMSCP PAMA and in-progress ECMSCP Focused Conservation Areas (FCA). We are also concerned with project-related increases in densities that would occur adjacent to lands that have been conserved for MSCP or other biological purposes. According to the SEIR, "w[W]hile the General Plan EIR did not evaluate or consider the impact of adopting the General Plan land use element on the former FCI lands, it was prepared as a Program EIR." Therefore, the SCMSCP consistency analysis provided in the General Plan EIR evaluated FCI lands at a density of one dwelling per 40 acres, whereas the current SEIR appears to include some

changes to the development densities within and adjacent to select SCMSCP open space and PAMA cases compared to the prior General Plan EIR. In areas where increased development is now proposed, it can potentially add strain on open space and conserved lands through direct and indirect impacts associated with various edge effects, including recreation use, trespass, and illegal dumping, and additional land management actions among other constraints. The final SEIR should clearly identify where the proposed project would change land use density or designations (either increase or decrease) within the adopted SCMSCP PAMA, draft NCMSCP PAMA, in-progress ECMSCP FCA and where it would occur adjacent to lands that have been conserved for MSCP or other biological purposes.

2. Figure 2.4-A depicts the boundaries of the adopted SCMSCP SAP planning area, draft NCMSCP, and in-progress ECMSCP plan areas in relationship to the FCI lands. However, this figure does not depict the locations of PAMA, Biological Resource Core Areas and designated wildlife corridors and linkage areas defined within the adopted SCMSCP. Additionally, the Department requests that the smaller-scale maps (e.g. Figure 1-2A and Figure 1-2B) provide a similar comprehensive approach. The final SEIR should include the above MSCP-related information on Figure 2.4-A to support the analysis of where and to what degree the proposed FCI GPA changes to land use density (especially increases) would result in direct or indirect impacts in the existing SCMSCP, draft NCMSCP, in-progress ECMSCP and to lands that have been conserved for MSCP or other biological purposes (see comment No. 1).

3. In response to our request to identify the ongoing NCMSP and ECMSP planning efforts, the SEIR references the October 29, 2008 Planning Agreement (PA) which establishes a process to review interim development within the planning areas to achieve the preliminary conservation objectives and preserve options for establishing a viable reserve system or equivalent long-term conservation measures. The October 29, 2008 PA described in the draft SEIR expired and was renewed on May 16, 2014. The final SEIR should use the latest 2014 reference when discussing the NSCMSCP and ECMSCP PA.

We appreciate the opportunity to comment on the SEIR for the Proposed Project and to assist the County in further minimizing and mitigating project impacts to biological resources. The Department requests an opportunity to review and comment on any response that the County has to our comments and to receive notification to the forthcoming hearing date for this project (CEQA Guideline; §15073[e]).

If you have questions or comments regarding this letter, please contact Eric Weiss, Senior Environmental Scientist at (858) 467-4289 or Eric.Weiss@wildlife.ca.gov.

Sincerely,

FOR
Gail K. Sevrens
Environmental Program Manager
South Coast Region

ec: State Clearinghouse, Sacramento
Eric Porter, U.S. Fish and Wildlife Service, Carlsbad

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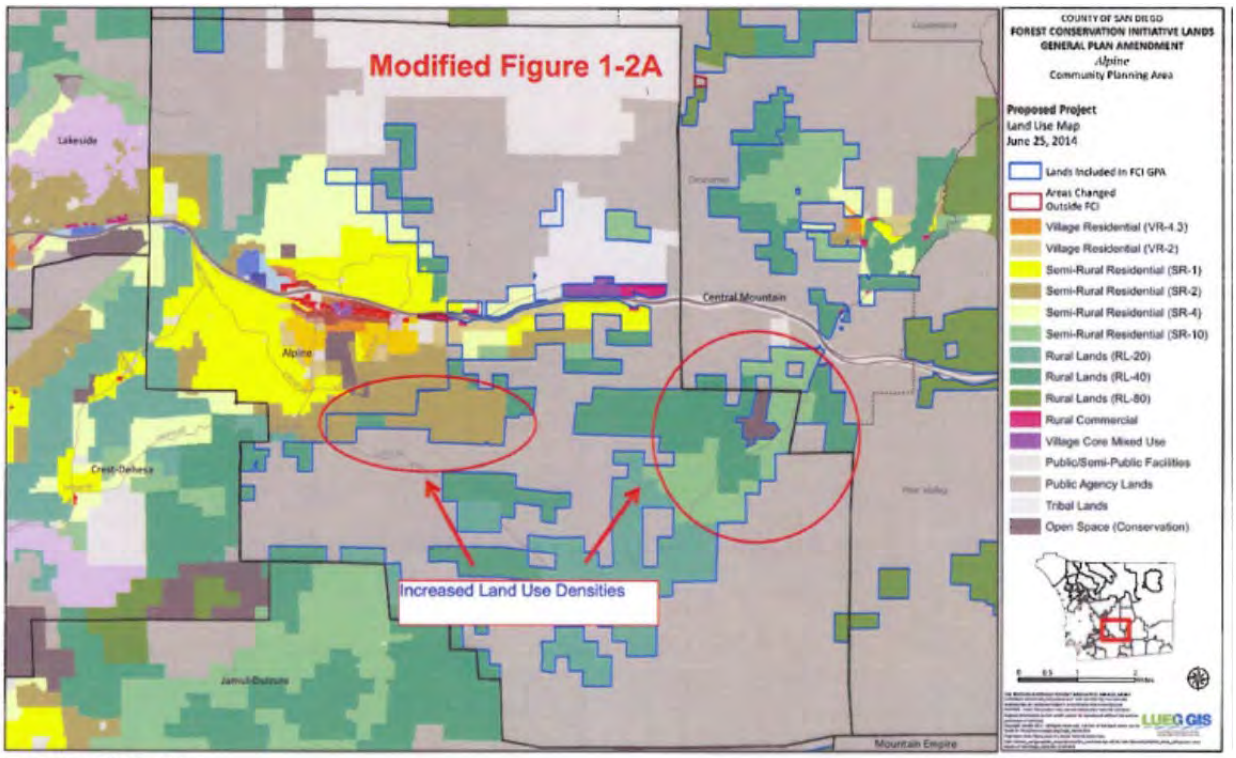

Source: SanGIS, County of San Diego, 2014

Alpine Land Use Map — Figure 1-2A

Date: February 25, 2016

Name: County of San Diego Planning & Development Services

Address: 5510 Overland Avenue,

Suite 11025621,

San Diego, California 92123

To: Robert Citrano, (Robert.Citrano@sdcounty.ca.gov)

RE: Forest Conservation Initiative Lands (FCI) General Plan Amendment

Thank you for the opportunity to comment on the County SEIR amendment addressing Forest Conservation Initiative lands.

The greater US Forest boundary which contains inholdings, is critical for the health of the forest which in turn is critical to the plants, animals, and health of the entire community of San Diegans.

Lands in the US Forest as well as actions that would impact the forest fall under the National Environmental Policy Act, (NEPA) as well as those private inholdings that additionally fall under the California Environmental Quality Act, (CEQA). These environmental laws require project planers to "take a hard look" at the information to make an informed decision.

The county is required to base its decision using criteria from a viable climate action plan; but the county does not currently have a climate action plan in place.

I would like to present the following points taking these issues into consideration:

- Because this is a US Forest Service boundary and this action applies to activities within that boundary; decisions there do not represent a weighted consideration upon community action; but must necessarily represent an action to preserve and protect the last remaining wild expanses of undisturbed *forest* that we have.

- The most critical place where this action must focus its efforts, is not at the center of a wilderness, miles into the interior; but *at* the forest boundary. Protection *must start* there if we are to insure that the wilderness within does not fall to more splintering and sprawl.

- Currently the County does not have Climate Action Plan criteria upon which to gage their determination. This is a crucial factor. In 1993 the FCI was first established with overwhelming voter support. During the subsequent twenty-three *successful* years of operation, consideration of climate stabilization criteria has become both critical and required. Nevertheless the County has not incorporated this requirement into their decision.

- In reviewing the video from the June 25, 2014 San Diego Board of Supervisors meeting we observed considerable meaningful testimony about the crucial role our forest plays in "providing a safe haven for species diversity, wilderness, solitude, *primitive* recreation, species refuge, and preserving the wild character of these lands." Specifically we observe very clear testimony from the US Forest Supervisor, William Metz, about these items and the critical role they additionally play in lands designated and recommended for full Congressional Wilderness status. Supervisor Metz specifically points out, that further subdividing these inholdings in the forest "puts the full viability of these wild and wilderness lands in jeopardy." I agree as did the over whelming majority of voters in 1993.

- The community observed considerable testimony as to the value in limiting the urban to wild interface in its role in fire starts and the increased risk as well as expense, to life and property in placing more humans in these areas.

- I emphasis as many others have the critical role our forests play in the health of the community, their role in the integrity of our watersheds, and the ecology of the lands, and in the stabilization of our climate, a goal required by state and federal law.

- While NEPA requires a decision maker to take a hard look at the issues considering and disclosing all relevant information; when I review the live testimony on the Central Mountain areas by out Forest Supervisor, Mr. Metz literally did not make it back to his chair before a motion was on the floor to return the status of the CU-1 areas to RL40.

- There followed a blissful attempt to have us believe that these areas were less remote and critical than the RL-80 designations to the immediate south. I beg to differ.

- While the county has not field checked these areas, I have, over the last twenty years both for myself and for numerous successful projects while representing the San Diego Sierra Club. This includes our support for the recent unprecedented decision to establish over 30,000 acres in recommended wilderness status. In this capacity I and consequently the Sierra Club San Diego has enjoyed one of the rare few, if not the most thorough field presences in the last two decades in these remaining remote, unspoiled corners of the Cleveland, photographing and videoing in these recommended wilderness areas, visiting them every month if not almost weekly. I support Mr Metz's decision as one of the most courageous and even noted by Ryan Henson of CalWild, as one of the most unprecedented land mark wilderness decisions nationwide, for the sustained future of our wild lands in this region.

- This particular section of the forest, the county labels Central Mountain, laying adjacent to over 30,000 acres of recommended wilderness, within the boundary of the Cleveland National Forest, is one of the most critical, remote, least inhabited, and most threatened, of the entire forest, most sensitive to water issues as well as the most biodiverse. In fact it may well be the most uniquely biodiverse region in the county. Indeed the Kumeyaay word "Cuyamaca" means "*where the water comes from*".

- Clearly the apparent dismissal at the end of testimony for this area, was uncommon for this body as we have seen incredible and much appreciated support in the past. Just last spring Supervisor Jacob put a stop and facilitated a miraculous turnaround to severely damaging dirt dumping practices in the same area. Within two weeks four years and thousands of cubic yards of dirt washing into the watershed was finally halted on a proverbial dime thanks to her attentiveness to the issues.

  Unfortunately this time by contrast, the reaction at the supervisor's meeting was shockingly devoid of the NEPA "hard look" at these issues, as well as general thoughtfulness to our Forest Supervisor's testimony. Obviously there could not have been time to even consider the very clear facts that were just presented by the Forest Supervisor himself in that meeting, over the validity of the emotional testimony of the land holders. They did not have time to verify the relationship of these speakers to the property as stated, moreover, while the only person in residence in the McCoy CU-1 section for the last decade and most in a thoughtful position to speak about these lands and 150 year history, was not present. Why did the other family members not ensure his testimony? Were they afraid that the one member that has known and cultivated a

relationship with the land and 150 year history around him may want to see that legacy remain intact?

- . I don't know but I see no clear reason or verification that this has been given sufficient review or consideration. Everyone wants a clear, easy, and final, swift answer. This is none of these. This one requires insight beyond math, physics, and economics of a physical world to at least some reasonable depth at the human ecumenical condition, courage, objectivity and foresight, -not selfishness.

I diverge for a moment to say what should have been said long ago.

Could the remaining heir and resident and his trusted colleagues living in the area, his wisdom and depth in understanding the components from the day by day facing them extend well beyond dollars and physical infrastructure?

In my opinion, clearly and absolutely.

From a 12 year history knowing him, Robert McCoy, his insight has been heartwarming, and enlightening, if not shockingly on point. He and his late and wonderful brother, David do not define life in terms that we could fully understand but to our historical record of our local society, they are invaluable and intrinsic. When I have looked at them and assured them that they are indeed the most important people in the forest, they looked back in humble, almost suspicious disbelief. But I've been there more than most and I can state categorically they are, and were. If nothing else they could use some time and elbow room. Not this outside malarkey, a contrived part of a contrived world reaching at them from down town, thrust upon theirs, living just next door to one of the most *UN-contrived* places in all of Southern California. They are disrespected via ignorance alone, so ignorant we think we are the ones in the know, in being pulled into a question using variables that were defined solely by the aggressor. We could only hope to speak their language. We have the same words; but I can assure you, we can't. Not only is the answers demanded where and when, not wanted nor appreciated, not even relevant to this remote world, I suspect there is no love for even defining this world by the *question* on outsider terms. Their genuiness and generousness did not recognize boundaries at all until recently, necessarily required to do so, with the sudden onslaught of hundreds of visitors into the area without warning or understanding.

I feel for what the truly legacy old timers, tied too closely to the stereotype of "Duck Dynasty's" , Si Robinson, Si, himself a victim of the

same in another part of the country, and with a heart and depth underneath, of William Faulkner for what truly matters when rarely allowed, without bias, to express themselves, what they have had to reconcile with the thousands descending upon a waterfall recently and discovering natural beauty for the first time. What a paradox!

You cannot address this question fairly or accurately until you take the time, diligence and courage, if not your own vulnerability lain upon the ground before you, to understand its components. No one in government is doing this, but to date I have my bets that when and if it comes; it will be the diligence of individuals within the USFS that go the distance. In many, many ways our legacy locals from the McCoy Ranch have been far more patient with the rest of us over the years, and more patient than many of us in the middle have been with the masses, suddenly showing up at their door step, far more respectful for far longer than clearly we have been with prejudging and demanding of them. They are far set apart than the average land investor, or even the modern guy, well meaning, and wanting to get a little piece of land away from it all. They ARE history in the live, and one of the last remaining links we have to an accurate view of the past. Careful what you seek... In my opinion the best you could do is suspend the question permanently for the foreseeable future and leave them alone. We gain volumes in the long run. They are a long lost treasure.

We look in horror at the legacy of our past upon the Native American Indian but then we fail to see our last remaining legacy ranches for the living history that remains and become as despicable in assuming we know beyond our old timers today as we were in severing all ties to the Native wisdom of the past. WE are the real losers in lost knowledge, in perpetuity, for it. We have so fallen out of scale in seeing this phenomenon for what it is and for what it represents it is mind blowing. The human condition is its own worst enemy once again. It's not too late to reconsider. This is a place where the question itself needs some very serious realigning, it is way too presumptuous in the context of this geographical apex.

To assume and proclaim on a dime without inspection or some time there, that it is the lessor end of the Central Mountain section you define, is almost shocking. This IS the CENTRAL Mountain, it is THE apex of the San Diego backcountry physically *and ecumenically*. It lies geographically in the center nestled up under Cuyamaca the 2nd highest mountain in the county escaping the top honors at Hot Springs by only 60 feet; but clearly far more known every day from every sky line in the county. I feel for the people but I feel even more for the endurance of

5

the integrity of the land. We should think long and hard, and carefully, before we decide we should, or are even entitled, to divide and conquer. After all we only dished up two deserts: subdivide by 40 or 80? What if we don't want desert?

What is the answer? I'm not sure; but I am sure we did not take a "hard look" and we do not have a good one yet. The numbers attempting to descend and force action by their own terms often even without checking in with the US Forest Service, here for any number of projects, is shocking; and the manner in which they attempted to do it, appalling. I've watched them all every step of it. Thanks to our Forest Supervisor it still has a chance to be spared heart break. But sorry, not the family members you saw give testimony, not the county, not even I, nor the Forest Service has the answers; but I think the latter two has at least acknowledged that much that we need to provide this particular corner a lot more grace and time until WE mature to a point that we act appropriately.

You have not begun to try to understand this area and that is what I object to more than anything. Because a place is not forest it suddenly becomes your jurisdiction and you suddenly know everything. You don't. When the residence of the Central Mountain area needed medical care who came, the County? Nope. It was members who cared and acted withing the US Forest Service. Who is at least paying attention? It wasn't the county. I caught red handed the county trying to turn the whole region into a giant wind farm and worse I caught them trying to NOT tell the Forest Supervisor. That alone gives me great pause about the county credentials to be making decisions here. I caught the county roads lying about their dirt dumping and storage and grading practices, --all too easily proven in the internet era with Google Earth's history function.

Again, I do appreciate that there are a few like Ms. Jacobs that step up and mean well, but the integration to the county government as a whole and my faith in them to take the extra mile for the intrinsic and ecumenically "San Diego" for perpetuity, is just not there, yet. This is within the bounds of the US Forest Service and that interface needs to demonstrate far more agility in working together.

I think we should impose nothing until we think about what we could lose for a lack of not getting out of our own way and that impact to all of time to come and to losing all of time that has come.

This is, at its core a philosophical question. –and those can be messy until clarity is at last earned and achieved. It will come, but it takes time and we should not destroy all in the process.

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That would go as well for other pressures upon that living legacy that merely want to demand their right to divide it up for profit. I cannot stand in the shoes of one that has ties so clearly to what I've read only in history books; but I have spent enough time in and around the area to know that we have not accurately defined this situation and a rash decision on things we don't understand would separate us from valuable truths from the past forever at the demise of our own ignorance and arrogance to think we know it all without ever going there, much less living it.

I'm afraid to admit it but I will. I would not divide these properties at all. They are a living history. That perspective crumbles the moment it is divided --Compensate the losses of those that must have their family share and be done with it. We created this situation a hundred years ago and that much still comes at a huge bargain for the rest of us. If we are to evolve appropriately we must do that much. Pay the trust their gold but leave the legacy alone. It is a drop in the bucket compared to the resource and the cost of losing it. We certainly have for good reason to the American Indian, why would these not carry a similar responsibility? Accommodate the family ability to be there, generationally; but to remove it without acknowledging its place both historically and environmentally would be a big mistake.

At the end of the day, that is what subdividing does, does it not?

I know it; you know it, and at least some of our living legacy knows it, those that think in deep and broad terms about the land and its connections, all too painfully well. Some in these families know exactly what I mean, some won't.

- So don't subdivide **at all** , it was our mistake as a society in allowing without insight in the first place, but **do** compensate the fringe on the trust; and be done with it and let the land live on.
- These are difficult questions but those in residence do not gaff off the sanctity of the natural history over their living conditions. They've given up plenty in the modern world to ensure the integrity of their birthright. They deserve recognition and acknowledgment certainly at least by contrived modern day planners. Forcing the divide and conquer plan is hardly fair. This needs something else; yet so far, no one has a good idea. That does not mean replace no plan with a bad one. IN the interim, leave it alone. Their depth if one actually takes the time to listen rivals William Faulkner. Their focus is a totally different league of

banking where their sense of currency lies well outside the nuts and bolts of this decision trust upon them by an outside modern government. These ranches were in place before California was even a state, nor were there local or state taxes demanded of them to pay for things they never asked for, but little by little the land shrivels for thrusting monetary tribute in property taxes upon them.

I doubt seriously they had the benefit of fair accounting or effective legal counsel in the process. It is something to consider many times over.

If it weren't for their hanging on, rich in beauty, poor in dollars, for being one of the few to discern and choose the difference accordingly, our back country would be a series of tasteless, emotionless, type converted grasslands, timeshares, and industrial energy projects with freeways connecting them. Instead they are some of the richest in diversity and unspoiled beauty and habitat we have.

- However if you want a 'black and white" answer to the upper Central Mountain section I'll provide a hefty place to start...In my opinion this is in the direction of the right thing to do:
  My plan costs money; but that is all. It could be much worse and much more expensive.

I would entitle the entire 160 acre McCoy Ranch to Robert Allen McCoy, the last "real McCoy", so to speak, to manage in full and to designate in legacy as he defines. He is the one that selflessly understands it, lives and nurtures it, studies its history, savors it day by day and preserves its legacy and still finds ample love for his family to share and learn from its history. It was clear from the testimony of his brother the late David McCoy that his only desire and real intention in life was to share this beauty with his family. David was poor beyond comprehension in dollars but rich more than most San Diegans know in the beauty he knew every day from the "real" San Diego. That was the unrelenting and uncommon choice he made, as has his brother. They deserve the respect of the community for the respect they have given the land. I quote even Supervisor Jacob in her comment, "thanks to the McCoys for all they have given San Diego" at the last meeting on this issue.

Dividing and conquering this apex of the geography and historical crossroads of the county is not going to preserve this dream. Therefore the solution is to NOT divide at all, keep the real and proven trustee of the land, Robert McCoy in the dream that is his birthright, then for the others on the trust, pay them the fair market share of their inheritance now without further talk of subdividing and be done with it. Provide the

family with a continued ability to be present on the family ranch as their late father had wanted, without its subdivision within the forest boundary. The county created this controversy and pushed it upon the oldest ranch in the area, the county could pay and it would be a bargain to lay this to rest once and for all. Mr. McCoy is not going to disallow his family's presence upon their family ranch; but he will and does treasure and recognize that legacy in its whole. If it were possible I would include the full worth of the Green property, -- if Green could be adequately compensated, and rejoin to include all 300 acres of the original McCoy Ranch. That is the right thing to do, ecumenically. It is a unique situation underscores its existence before statehood. It deserves a thoughtful resolution, if possible without our barbaric intrusion further upon a private property and the county taking the responsibility to provide it. This solution endures the legacy and satisfies the financial woes of its inheritors, while preserving the integrity of its juxtaposition in the forest. That would answer once and for all the question of subdivision for this ranch and this issue. The only other property in like kind to this issue is the Marston Ranch to the immediate north east of the McCoy Ranch, which should be granted similar solution if and when the time comes. However its owners are not the legacy locals that have the unique issues of the McCoy Ranch. The county, essentially the public can pay for the course of history in putting things right. Otherwise we can spend another 20 years coming up with a better one that will be far more expensive in the long run. How much have we spent already on this? Fair? Much fairer than the debate before us now. It is a win-win. A similar solution should prevail for any other large legacy ranch inside the forest boundary. They should not be subdivided at all at the demise of forest and history; but their heirs should be compensated ***and*** allowed to have a presence on an undivided family owned parcel without further pawing at their property.

Just what does intact mean from the outside looking in and where are our boundaries to intrude? We may not be in a position to answer but I think that clearly these variables need more time and they need to be put into the context of the bigger picture. That picture now includes required CAP criteria as well as a long long voter recognized validity of our National Forest Boundary and autonomy of the US Forest Service to manage its lands under NEPA.

- While we too cherish the living historical legacy of these hundred and fifty year old ranches I fail to grasp how that cherished living legacy

would be favored by subdividing and redevelopment over this historical living legend in its current juxtaposition to the Forest in keeping it whole. That rare living legacy, remains a valuable resource in of itself, and unique and precious living glimpse of the past, also threatened side by side with natural resources there and in the adjacent Federal Forest.

- Therefore I resolve that the County of San Diego:
    1. MUST NOT evaluate the conditions of this region until they have legally acceptable Climate Action Plan criteria with which to do so.
    2. Additionally these criteria must protect our Forest Wilderness and watershed as critical components of a valid climate action plan as well as critical to the health of the forest ecology, and of our community.
    3. This decision should not be based on grandfathering old habits and political visibility; but on solid and scientific information that preserves our forests and the forest boundary in perpetuity.
    4. The county MUST respect the concerns of the US Forest Service in restricting further subdivisions, development, and management within the Cleveland National Forest, particularly next to wilderness, recommended wilderness, and anywhere within the US Forest greater boundary, where Forest resources, especially those protected by wilderness, such as water, habitat, critical species, critical and unique ecologies such as those in all of those the critical Central Mountain region, *quiet* untrammeled character and scenic integrity, could be compromised by more human activities such as a reduction in the protections by the FCI and *any OTHER* upcoming county proposals within the Forest Boundary.
    5. I would like to reference the concurrent comments by the Cleveland National Forest Foundation (CNFF) on this issue and recognize their suggestions to create a "forest" designator overlay district that would apply to all lands regardless of parcel size within the FCI planning area. I quote "New development can and should be accommodated inside the Village designated areas so that open space and forest land values can be preserved." I agree.

IN Conclusion:

- Please do not accept less than the most environmentally stringent options for this effort.
- Please DO respect the guidance of the US Forest Service within the greater Forest Boundary.

Thank you again for the opportunity to participate in these very critical decisions for San Diego.

Sincerely,

Cindy Buxton, on behalf of myself

Former Chair of the Forest Committee, Adoptive Parent (CalWild) of the Eagle Peak recommended Wilderness

541 Spruce Street

Imperial Beach, Ca. 91932

(619) 823-3620

February 28, 2016

LEAGUE OF WOMEN VOTERS OF SAN DIEGO COUNTY

February 29, 2016 Statement by the League of Women Voters of San Diego County
To: San Diego County Planning & Development Services
Re: GPA 12-004; SCH NO. 2012081082; FOREST CONSERVATION INITIATIVE (FCI) LANDS GENERAL PLAN AMENDMENT (GPA)

The League of Women Voters supports principles of compact growth, enforcement of fire-safe development, and identifying and safeguarding valuable agricultural land, a limited but renewable resource. We promote conservation and preservation of critical natural resources, including habitat, open space and farmland. Our Land Use position supports minimizing urban sprawl and maintaining established patterns of growth and community identity within an area by allowing self-determination in community planning and decision making. We review major development projects which have regional impacts, including environmental analysis, for consistency with the comprehensive plan and regional infrastructure plan. Land use decisions should relate to and protect the overall quality of the environment while minimizing additional motor vehicle traffic.

When the 2003 Cedar fire and the 2007 fires ravaged San Diego County, we knew that the back country would never be the same in our lifetime. Now, we are faced with another looming disaster—a man-made disaster. If the County allows increased density and leapfrog development in our last remaining wilderness area, then the diversity of wildlife in the county will be in jeopardy. Key wildlife corridors will be fragmented. At least 20 plant and animal species will be at risk of extinction.

We need zoning regulations that prevent a substantial increase in density. Based on our LWV principles, the proposed auto-based sprawl development consisting of thousands of new housing units in our national forest is unacceptable. Areas, such as Alpine, would suffer from inappropriate subdivision into residential estates rather than preserving its rural characteristics and qualities.

Please retain the integrity of the General Plan by preventing the subdivision of intact habitat, farmland and our watershed. These subdivisions would burden taxpayers with the costs of providing services and roads to distant areas while endangering more properties and citizens with limited water supplies, inevitable wildfires, and greenhouse gas emissions.

Your draft SEIR identifies significant environmental impacts associated with wildfire hazards, biological resources, air quality, aesthetics, agricultural resources, traffic & transportation, hydrology & water quality, mineral resources, noise and utilities. These impacts concern us.

The League of Women Voters of San Diego County urges you to abide by the minimum 40-acre parcel limit established by the Forest Conservation Initiative, which two-thirds of the voters overwhelming passed over 20 years ago. Furthermore, please adhere to the principles and guidelines of the recently adopted General Plan and prevent auto-based sprawl. Please protect what remains of our Cleveland National Forest.

Thank you very much for your consideration.

Jeanne Brown, President
LWV San Diego

Jōsan Feathers, Registered Civil Engineer
Natural Resources Director
LWV San Diego County

Cathy Greene
Steering Committee Member
LWV North County San Diego

USDA United States Department of Agriculture | Forest Service | Cleveland National Forest | 10845 Rancho Bernardo Road Suite 200 San Diego, CA 92127

File Code: 1560
Date: February 29, 2016

Mark Wardlaw, Director
San Diego County Planning and Development Services
ATTN: FCI Lands General Plan Amendment
5510 Overland Avenue, Suite 310
San Diego, California 92123

Dear Mr. Wardlaw,

The Cleveland National Forest appreciates the opportunity to comment on the potential impacts of the proposed General Plan Amendment for the former Forest Conservation Initiative (FCI) lands. We also appreciate the consideration given to our input by San Diego County Supervisors and staff throughout this process, including the designation of a Special Study Area in Eastern Alpine. The Forest's comments herein include comments previously submitted during the scoping period, as well as comments on both the initial and re-circulated Draft Supplemental Environmental Impact Reports (SEIRs).

Altogether, we remain concerned about the potential environmental and public health and safety impacts that would be associated with increases in population density on former FCI lands, and we find that these impacts are neither adequately disclosed in the Draft SEIR nor consistent with the objectives of the County of San Diego General Plan. Our review of the re-circulated Draft SEIR has revealed that no responses were provided to our comments on the initial Draft SEIR, nor did they result in changes to the analysis. It is also worth noting that the areas of the Cleveland National Forest proposed for recommended wilderness status at the time of our previous comments were granted this highest level of agency protection in October 2014.

We find that the best way to protect both the environment and public health and safety in the vicinity of the FCI lands, including the Cleveland National Forest, would be to select the Environmentally Superior Modified FCI Condition Alternative. In addition, we request provisions that development on private lands will not rely on the Cleveland National Forest for infrastructure or vegetation management needs and that impacts to the Cleveland National Forest from such development will be avoided, minimized, or mitigated.

We will begin by highlighting key issues and management challenges related to urbanization that were described in detail in our 2005 Forest Land Management Plan. These issues are common to all former FCI lands and are central to the potential environmental and public health and safety issues associated with increasing population density within and adjacent to the Cleveland National Forest. Next, issues particular to specific mapped areas of the plan are addressed. Finally, comments specific to the SEIR are addressed at the end of this letter.

Comments Addressing all FCI Lands

The rapidly increasing population of Southern California, the growing level of development adjacent to the Cleveland National Forest, and the resulting effects on the National Forest System (NFS) lands present some of our main management challenges. Higher density development in more remote areas leads to more Wildland/Urban Interface area that is at risk of and in need of protection from wildland fire. The combination of increased development and the need to protect these developed areas from fire and other natural events, such as flooding, will put increasing pressure on National Forest managers to alter landscape character to accommodate these uses. In the case of fire, suppression efforts to protect communities can lead to the buildup of fuels and eventually to higher severity, more damaging fires than would occur naturally. Furthermore, increasing the number of homes in an area increases the likelihood of human-caused fires, which can increase fire frequency to levels that harm ecosystems, wildlife, and waterways. Finally, we have concerns about the potential difficulty of evacuating people from remote subdivisions when wildland fires occur nearby on the Cleveland National Forest.

Urban development also puts pressure on public lands to provide urban support facilities (i.e. infrastructure) through special-use authorizations as private land options for development are exhausted. In the past, subdivisions have been established with the expectation that adjacent National Forest land can accommodate necessary water tanks, utilities, and defensible space to protect homes from wildfire. Instead, we now request that private lands be required to serve these purposes for future subdivisions through the blanket incorporation of self-sufficiency for new development projects on FCI lands. Along the same lines, where water delivery systems are not in place, the installation of wells for household use will lower the groundwater table beneath adjacent NFS lands, thereby degrading habitats for native plant and animal species. To avoid these impacts, we request that water delivery systems be established before enabling increased density on former FCI lands.

Road access presents several primary issues associated with increasing population density within or adjacent to the National Forest. The narrow, winding National Forest road system was built in the 1930s to support fire protection and does not meet typical County access standards. Moreover, the greater the population density of an area, the wider a suitable road would need to be. The National Forest roads generally lack rights-of-way where they cross private lands, which would need to be obtained in order to widen them or convey utilities. Furthermore, any improvements to Forest or County roads on the National Forest would require substantial planning and environmental compliance to be borne by project proponents, if permitted. Widening roads, building new roads, and increasing traffic to accommodate increasing population density in remote County areas would negatively impact plants and animals in a variety of ways, including direct mortality and habitat loss and fragmentation, and would also increase erosion and sedimentation of waterways.

Increased interface between developed private lands and National Forest boundaries also increases boundary management challenges including addressing occupancy trespass, clearly posting boundaries, and retaining clear title to NFS land. For example, in re-marking forest boundary after the 2007 fires, we discovered major encroachments adjacent to some subdivisions.

Another challenge associated with urbanization is the complex problem of National Forest access. For example, traditional points of public and administrative access to the National Forest have been lost as private land is subdivided. New landowners are often reluctant to accommodate access across their land. At the same time, residents living adjacent to the National Forests want convenient access, often resulting in the development of unplanned roads and trails. Unauthorized motorized vehicle use occurs and tends to be more of a management challenge on National Forest lands near private developments. As an example, illegal motor vehicle use of the Pacific Crest Trail has been reported from the Lake Morena area in the midst of the federally designated Hauser Wilderness.

Population growth within and surrounding the National Forests will probably be the single largest impact on National Forest recreation management in the foreseeable future. This growth has pushed urban development closer to and within the National Forest, in some cases directly adjacent to National Forest boundaries. Where NFS lands are or will be the boundary to this development, there will be pressure on these adjacent lands to provide diverse kinds of recreation. Higher density development would be expected to increase this pressure. Recreation on the National Forest is managed according to Recreation Opportunity Spectrum (ROS) to provide choices for people to recreate in settings that vary from urban to primitive. In general, the Forest Service would prefer zoning on adjacent private lands to be complementary with the land use zone and ROS on the NFS land. For example, where there is interface between private lands and NFS lands within a designated or recommended wilderness area or Inventoried Roadless Area, lower density County zoning would be the more complementary. Solitude, an increasingly rare opportunity, is a desirable feature in wilderness, but would be difficult or impossible to retain in the face of the increasing population and higher density development.

Extensive habitat conservation planning efforts led by local government and conservation organizations have identified the need to maintain an inter-connected network of undeveloped areas or landscape linkages, which retain specific habitats and allow for maintenance of biodiversity and wildlife movement across the landscape and led to development of several multi-species habitat conservation plans. National Forest System lands are a core element of this natural open space network and will play an increasingly important role as additional habitat fragmentation occurs on surrounding private lands. Fragmentation is the breaking up of contiguous blocks of habitat by urban development features into progressively smaller patches that are increasingly isolated from one another and of less value for conservation. Higher density zoning allows for a higher level of development and, accordingly, fragmentation. Habitat loss and fragmentation are the leading causes of species extinctions, and the Cleveland National

Forest has many populations of federally-listed threatened and endangered species that could be affected by increasing population density on former FCI lands. Meanwhile, invasive species generally enter new areas through human activity in those areas, and so increasing population density would result in the introduction of new infestations that would damage Forest resources and be costly to manage.

Comments Specific to Particular Locations

- **Alpine Community Planning Area (CPA).** The Forest is concerned about the density increases proposed for areas at the eastern end of Alpine, both south and north of Interstate 8. Road and water systems should be planned before enabling such increases, and the severe risk of fires in this area should be addressed. In addition, Viejas Mountain was designated a Critical Biological Area of the National Forest by our Land Management Plan due to its unique botanical resources. The Modified FCI Condition Alternative would best prevent the environmental and public health and safety impacts described above. More detailed information about these and other concerns are available in an attached letter to the County Board of Supervisors dated June 20, 2014.

- **Jamul CPA – Skye Valley Ranch.** The Forest would recommend continuing the RL-80 zoning on these parcels. The bridge over Pine Creek near Barrett Honor Camp is insufficient for any traffic, even in an emergency, and will not be improved or replaced since it falls within the Pine Creek Wilderness. Additionally, these parcels border two existing federally designated wilderness areas (Pine Creek Wilderness and Hauser Wilderness) and are completely surrounded by NFS lands. Further improvement of infrastructure to this area, such as utilities and road access, required for a smaller lot size zoning would have a negative impact on wilderness values, increase the need for fuels treatments, and raise potential for the issues and impacts described above.

- **Areas west of Cuyamaca CPA.** The Forest supports RL-80 zoning for parcels adjacent to the Cuyamaca CPA along Boulder Creek Road. These parcels are located in a very undeveloped and fire prone part of the Cleveland National Forest and are adjacent to lands zoned as recommended wilderness.

- **Descanso CPA.** The Forest encourages the County to retain the lower density RL-80 zoning. The northern part of the Descanso CPA abuts two areas zoned as recommended wilderness. Also adjacent to the north Descanso CPA is the King Creek Research Natural Area, which contains a rare population of Cuyamaca cypress, a Forest Service sensitive species. All of the King Creek stands burned in a fire in 1950 and most of the area re-burned in the 2003 Cedar Fire. Post-Cedar Fire regeneration is expected to be adequate to repopulate the stands because trees were old enough to have substantial cone banks at the time of the fire; however, it is important to protect the stand from overly frequent fire especially at this vulnerable time.

- **Pine Valley CPA.** The Forest encourages the County to retain the lower density RL-80 zoning. This area contains many of the highest recreational and scenic values to be found on the Cleveland National Forest. Parcels in this CPA south of Interstate 8 are directly adjacent to the federally designated Pine Creek Wilderness. Parcels along Sunrise Highway are adjacent to the Mount Laguna National Recreation Area. The Forest also supports maintaining the proposed RL-40 zoning adjacent to Buckman Springs Road because the NFS land to the east is zoned as Back Country Non-Motorized, which is the most restrictive zoning other than recommended wilderness and designated wilderness. In addition, the Pacific Crest Trail, a 2,650-mile national scenic trail that runs from Mexico to Canada through California, Oregon and Washington, traverses this area before moving onto the National Forest. Retaining the current density limit would help maintain the recreational and scenic values.

- **Central Mountain CPA.** We recommend RL-80 zoning for parcels in the Central Mountain CPA where RL-40 zoning in the adjacent Julian CPA was extended into parcels within the Cleveland National Forest. This recommendation affects two contiguous parcels that are adjacent to the Upper San Diego River Canyon. The Upper San Diego River is an area of rugged topography and high fire danger and is zoned as recommended wilderness.

- **Pendleton – De Luz CPA.** The Forest recommends reducing the allowable density to RL-80 in areas surrounded by NFS lands in the Pendleton - De Luz CPA. These parcels are directly adjacent to the federally designated San Mateo Canyon Wilderness area. The parcels on Miller Mountain contain unique botanical resources and would require major road improvements across NFS lands if developed.

- **North Mountain CPAs.** The Forest supports RL-80 zoning in the North Mountain CPA and encourages the county to retain this zoning through the planning process. We are uncertain of the proposed density for the triangular parcel on the north side of Warner Springs, which abuts the Caliente recommended wilderness. Reducing the density for this parcel to the RL-80 zoning would better buffer the recommended wilderness area from adjacent land uses.

Comments on the Draft Supplemental Environmental Impact Report

The Draft SEIR should clearly make the case that the objectives presented in Chapter 1.3, as drawn from the County of San Diego General Plan, are met by the Proposed Project. In our view, the document fails to demonstrate that the Proposed Project meets the majority of the objectives and instead includes evidence that objectives will not be met. Other than stakeholder participation, the only objective that the Proposed Project could meet is the first one listed – "Support a reasonable share of projected regional population growth;" – and we feel that it fails to meet even this objective, because the failure to meet the remainder of the objectives renders the share of growth unreasonable. The Proposed Project clearly conflicts with 6 of the 10 objectives, as the rationale beneath each objective below demonstrates:

- Promote sustainability by locating new development near existing infrastructure, services, and jobs.
    - Remote parcels within and adjacent to the Cleveland National Forest are far from infrastructure, services, and jobs.
- Promote environmental stewardship that protects the range of natural resources and habitats that uniquely define the County's character and ecological importance.
    - Increased development on remote parcels within and adjacent to the Cleveland National Forest threatens many of the natural resources and habitats that uniquely define the County's character and ecological importance.
- Ensure that development accounts for physical constraints and the natural hazards of the land.
    - Remote parcels within and adjacent to the Cleveland National Forest experience severe risk of wildland fire incursion.
- Provide and support a multi-modal transportation network that enhances connectivity and supports community development patterns.
    - Remote parcels within and adjacent to the Cleveland National Forest are accessible only by passenger vehicle and road access is substandard for general residential use.
- Maintain environmentally sustainable communities and reduce greenhouse gas emissions that contribute to climate change.
    - Remote parcels within and adjacent to the Cleveland National Forest would not be environmentally sustainable for numerous reasons cited throughout this letter, and the development and access would increase greenhouse gas emissions that contribute to climate change.
- Minimize public costs of infrastructure and services and correlate their timing with new development.
    - Remote parcels within and adjacent to the Cleveland National Forest would maximize public costs of infrastructure and services.

The assumption is made throughout the analysis of potential impacts that "regulations, implementation programs, and mitigation measures from the General Plan Update EIR" will result in impacts that fall below the threshold of significance. This assumption is flawed in that it fails to recognize the irretrievable losses to natural and cultural resources involved when subdividing new areas of an already densely populated region. The Draft SEIR presents numerous plans and projects considered in evaluating cumulative impacts, but it fails to include the impacts of the past development of San Diego County, as represented by the existing condition of the region. When viewed through this lens, further increases of population density in remote areas of the County will necessarily have significant impacts, regardless of "regulations, implementation programs, and mitigation measures." The scope of the cumulative impacts section needs to be broadened to include development that has occurred up to the current time.

While the Draft SEIR considers many topics, it fails to offer the level of detail that would be needed to evaluate the environmental impacts of its alternatives. We feel that as a result of the vague nature of the analysis presented, environmental and public health and safety impacts have not been sufficiently analyzed or disclosed. Examples of these deficiencies are provided below by topic.

Biological Resources

With regard to description of the impacts of the FCI Lands project on biological resources, there is no description of the actual impacts, as no inventory, identification, or evaluation of such resources has been completed and the actual impacts are unknown. Instead, there is only a general discussion of potential project impacts on general plant and wildlife species. These are assumed to be significant and unavoidable for special status species, riparian habitat, and wildlife movement corridors (Table S-2). However, there is no identification of effects on individual species even though the project will adversely affect or is likely to adversely affect a number of federally-listed species including Arroyo Toad, California Gnatcatcher, and San Diego Thornmint as well as candidate species for listing such as Hermes Copper butterfly. The proposed alternatives will also adversely affect many of our Regional Forester's list of Sensitive Species through direct mortality and habitat loss and fragmentation, creating difficulties for conserving their populations on NFS lands. The blanket approach taken by the Draft SEIR does not adequately describe and disclose effects on these species, effectively leaving this analysis to later piecemeal analyses that will be done for individual projects. This does not allow for meaningful protection and conservation of these species across broader areas and is therefore inconsistent with the purpose and intent of CEQA.

Given the lack of detail in the SEIR, it is not possible to perform a meaningful comparison of the effects of the different alternatives. The analysis does not provide enough information to determine which alternative would best conserve key resources.

Cultural and Paleontological Resources

Section 15123(b)(3) of the CEQA Guidelines requires that an EIR address the issues to be resolved, which includes the choices among alternatives and whether or how to mitigate significant impacts. As stated in the Draft FCI Lands SEIR, the major issues to be resolved regarding the project include decisions by the Lead Agency as to whether or not the Draft SEIR adequately describes the environmental impacts, whether the recommended mitigation measures identified for the Proposed Project should be adopted or modified, or if additional mitigation measures should be required.

In regard to adequate description of the impacts of the FCI Lands project on historic or archaeological resources, there is no description of the actual impacts, as no inventory, identification, or evaluation of such resources has been completed and the actual impacts are unknown. Instead, there is only a general discussion of potential project impacts, which are assumed in advance to be less than significant through the implementation of various policies and mitigation measures contained in the General Plan Update.

Table S-2, "Summary of Project Impacts" and various sections of the Draft FCI Lands SEIR contain information indicating that implementation of the Proposed Project would result in new development that would have the potential to result in substantial adverse changes to the significance of historical resources and cause a substantial adverse change in the significance of archaeological resources, including the destruction or disturbance of archaeological sites that contain or have the potential to contain information important to history or prehistory. However, with the application of various policies and mitigation measures, impacts to historic and archaeological resources are assumed to be "less than significant." It is unclear from the analysis that cultural resources will actually be protected by such policies and measures to the extent that they would not be significantly affected by the Proposed Project.

In Section 2.5 "Cultural Resources" of Table S-3 and various other sections of the Draft SEIR contain information indicating that the "Modified FCI Condition" alternative is likely to result in less impacts to historical and archaeological resources when compared to Proposed Project, and that implementation of the "No Project" alternative is likely to result in greater impacts when compared to the Proposed Project. However, under the mitigation process proposed in the Draft SEIR, impacts to historic and archaeological resources would be "less than significant" with the implementation of mitigation measures for the Proposed, Modified, and No Action alternatives. This assumption is based on the assumption in advance that historic and archaeological resources are distributed evenly throughout the FCI lands. Depending on the actual distribution of these resources within the FCI lands, the differences in potential impacts between the implementation of the Proposed, Modified, and No Action alternatives could be substantially different than those assumed in the Draft SEIR. The only real difference between the implementation of any one of these three scenarios would be the potential for significant impacts, not actual impacts, assuming the implementation of policies and mitigation measures always result in "less than significant"

impacts. As a result, the comparison of these three scenarios is of no actual quantitative or qualitative value for the purposes of identifying an "Environmentally Superior" course of action.

Page 12 of the "County Cultural Guidelines" states that "Determining what is an important cultural resource worth preserving [sic] is a subjective and interpretive process; therefore, it is useful to utilize a standard assessment approach to evaluate cultural resources. In order to evaluate cultural resources, a comprehensive assessment must be conducted, including measuring the resource against the State CEQA Guidelines provisions and criteria established by the National Register of Historic Places, the California Register of Historical Resources, and the San Diego County Local Register of Historical Resources, and the Resource Protection Ordinance as well as assessing the integrity of the resource." Without any actual assessment or evaluation of historic and archaeological resources within the FCI Lands project area, there is no quantitative or qualitative basis for comparing the various courses of action, selecting an "Environmentally Superior" alternative, determining whether the recommended mitigation measures identified for the Proposed Project should be adopted or modified, or determining if additional mitigation measures should be required for this project, as the Draft FCI Lands SEIR does not adequately describe the impacts of the Proposed Project on historic and archaeological resources.

Hazards and Hazardous Materials

The section that deals with Wildland Fire (2.6.3.7) concludes that the Proposed Project would have significant impacts related to wildland fire, while suggesting that regulations, implementation programs, and mitigation measures would reduce those impacts. In the Mitigation Measures section (2.6.4.7), several mitigation measures are deemed infeasible that would dramatically reduce losses of homes and lives through restricting development in areas with more than a moderate fire hazard or requiring extensive fuel modification around development. Instead, the analysis determines that "one of the primary objectives of the project which is to accommodate a reasonable amount of growth" renders these mitigation measures infeasible. Apart from the fact that this conclusion disregards the remainder of project objectives, it also suggests that it is more valuable to allow growth in high and very high fire hazard areas than to protect those homes and people from the very hazards that the mitigation measures were designed to prevent. The end result of increasing population density on the former FCI lands will be greater losses of lives and property to recurrent wildland fire.

On a related note, the sections that Deal with Emergency Response and Evacuation Plans (2.6.3.6 and 2.6.4.6) conclude that significant impacts will be avoided through regulations, implementation programs, and mitigation measures. Three of the four measures presented, however, do not reflect the reality of the roads that would provide access to many of the FCI lands. These roads generally lack an interconnected road network, multiple ingress and egress routes, and suitability for use as rural roads serving residential subdivisions. The hazards of unsuitable escape routes resulting from these conditions along with the above-mentioned

permission to develop in areas with high to very high fire hazards makes the likelihood even greater that implementation of the Proposed Project would lead to tragic losses of life and property.

Land Use

Given that the FCI lands are by definition in close proximity to the Cleveland National Forest, it is surprising to find no mention of our Land Management Plan in Section 2.8.3.2, which considers "Conflicts with Land Use Plans, Policies, and Regulations." As described in the beginning of this letter, increasing population density on FCI Lands would lead to numerous environmental and public health and safety issues on the Cleveland National Forest, as described in our 2005 Land Management Plan, and would accelerate problems that our Plan directs us to remedy. As a result, we call into question the determination that project impacts with regard to land use plans, policies, or regulations would be below a level of significance. The conflict of this project with our Land Management Plan should be investigated and disclosed as part of this analysis.

Nowhere is the disconnect between this project and our Land Management Plan greater than where the FCI lands are adjacent to or within designated or recommended wilderness areas. There is no mention of designated or recommended wilderness on the Cleveland National Forest. As such, there is no basis provided for evaluating the potential for the project to impact wilderness areas adjacent to FCI Lands. Potential project impacts on the wilderness resource could be significant and unavoidable, although it is not possible to perform a meaningful comparison of the effects of the different alternatives due to the lack of mention of wilderness in the Draft SEIR.

Section 2(c) of the Wilderness Act of 1964 (Public Law 88-577) defines wilderness: "A wilderness, in contrast with those areas where man and his own works dominate the landscape, is hereby recognized as an area where the earth and its community of life are untrammeled by man, where man himself is a visitor who does not remain. An area of wilderness is further defined to mean in this Act an area of undeveloped Federal land retaining its primeval character and influence, without permanent improvements or human habitation, which is protected and managed so as to preserve its natural conditions and which (1) generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable; (2) has outstanding opportunities for solitude or a primitive and unconfined type of recreation…"

In summary, the key elements of wilderness include its natural state (biological and other natural processes operating unimpaired, uninhibited, and unchanged by humans), opportunities for solitude and primitive recreation opportunities, undeveloped character, and untrammeled (unmanaged) nature.

Increased density and development near or adjacent to designated or recommended wilderness areas would likely adversely affect the wilderness resource in a number of ways. Increased population in the County, particularly in rural areas, may result in increased use of wilderness, therefore impacting opportunities for solitude and primitive recreation opportunities. The visual impact of subdivisions on the wilderness user is also due consideration. Development in the vicinity of wilderness increases the likelihood that non-native, invasive species would be introduced into wilderness, thereby disrupting natural processes within the wilderness. Development upstream within watersheds shared by wilderness increases the likelihood of impaired water quality or decreased stream flows in wilderness due to runoff, impoundments, and/or groundwater use. Similarly, development adjacent to wilderness increases the likelihood that landowners build trespass structures, roads, or trails in wilderness, or use motorized or mechanized equipment in wilderness, thereby impacting its undeveloped character. Finally, increased development and density near wilderness increases the likelihood that fire management activities would impact the wilderness resource during wildfire events, which impacts the natural and untrammeled characteristics of wilderness.

Recreation

While the SEIR presents a very broad analysis of the effects of the project on recreation facilities, it does not contain any discussion or analysis of recreation activities in undeveloped, backcountry areas accessed by trail or cross-country travel. Increased recreation in undeveloped, backcountry areas can have substantial adverse effects on the environment, including litter, graffiti, impaired water quality, erosion, increased risk of wildfire, and various impacts to vegetation, wildlife, and cultural resources.

Increased population in the County would likely lead to an increase in recreation in both developed facilities and undeveloped, backcountry areas. While this increased use could have beneficial recreational impacts, the SEIR should include an analysis of environmental impacts that result from recreation in undeveloped backcountry areas, as it does for developed facilities.

Conclusion

We appreciate the development and consideration of the Modified FCI Condition (Environmentally Superior) Alternative as described in Chapter 4.1. From our perspective, the sacrifice of 28% of the residential dwelling units of the Proposed Project would be worth the resultant protection of resource conditions and reduction of wildfire risk to communities and would best achieve the objectives of the General Plan. Moreover, the areas where the lower densities would be located, as specified in the Modified FCI Condition Alternative, are precisely the areas where resource and wildfire concerns are greatest. As a result, we strongly support the adoption of the Modified FCI Condition Alternative rather than the Proposed Project. In addition, we request provisions that development on private lands will not rely on the Cleveland

National Forest for infrastructure or vegetation management needs and that impacts to the Cleveland National Forest from such development will be avoided, minimized, or mitigated.

To conclude, we appreciate the consideration that you have given to our past concerns about this project and hope that you give similar consideration to our concerns about the re-circulated Draft SEIR. We are very interested in working with the County of San Diego to achieve the objectives of the project that address environmental sustainability and risk avoidance. Thank you for the opportunity to comment on the potential impacts of the Proposed Project for the former FCI lands in the unincorporated areas of San Diego County. If you have any questions about these comments, please contact Jeff Heys, Forest Planner, at (858) 674-2959.

Sincerely,

WILLIAM METZ
Forest Supervisor

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File Code: 1560
Date: June 20, 2014

Board of Supervisors
San Diego County
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Dear Supervisors,

This letter regards the Forest Conservation Initiative (FCI) Lands General Plan Amendment scheduled for a land use map decision at your upcoming Board of Supervisors meeting on June 25th, 2014. We appreciate the consideration that San Diego County Planning and Development Services staff have given to our concerns about impacts to the Cleveland National Forest throughout the planning process. For detailed comments on the project's Draft Supplemental Environmental Impact Report (SEIR), please refer to our letter dated March 18th, 2013.

The Forest Conservation Initiative was approved by the voters of San Diego County because "(t)remendous development pressures in San Diego County are resulting in the rapid fragmentation and destruction of the Cleveland National Forest… The Cleveland National Forest is one of the largest expanses of undisturbed, natural open space in Southern California and as such is valuable as a watershed, agricultural area, and recreational area for the citizens of San Diego County… The unique resources of the Cleveland National Forest are of such significance that development on parcels within the Forest must be restricted." Over the two decades since its passage, the development pressures on the Cleveland National Forest have only grown, while the unique resources of the Cleveland National Forest have become even more vulnerable.

The Cleveland National Forest Land Management Plan identifies three primary management challenges – urbanization, fire, and wildlife and plants – which are interconnected and would be exacerbated by increased development on the FCI Lands. We understand that the County's current zoning status is far denser than the FCI allowed and that alternatives may therefore reduce development density by comparison. For clarity, the term "increased development" is used throughout this letter to refer to the construction, additional residents, and associated activity that is likely to result from the subdivision of lands relative to their former restriction of one dwelling unit per 40 acres.

Urbanization

Watershed protection for San Diego was the primary purpose for the establishment of the Cleveland National Forest. Increased development of the FCI Lands would reduce the Forest's water supply and quality due to increased road density, ground disturbance, impervious surfaces, groundwater withdrawals, and pollution. Not only would this affect San Diego's water supply, it would also degrade habitats dependent upon the Forest's water resources.

Increased development of the FCI Lands would also lead to management challenges for the Cleveland National Forest. Boundary issues including marking, encroachment, and unauthorized uses would increase, resulting in resource damage and increased costs for surveys, enforcement, litigation, and restoration. Infrastructure needs, such as water systems, energy delivery, or road widening, are often expected of Cleveland National Forest lands but result in impacts and preclude other uses of an area. Where FCI Lands are adjacent to Congressionally-designated or agency-recommended Wilderness areas, increased development would degrade the wilderness character for which they were protected and increase the challenges of wilderness management.

Fire

Increased development of the FCI Lands would present many challenges to fire managers with respect to the threat and prevention of wildland fire. San Diego County has a long history of large, devastating wildfires that have resulted in significant losses of structures, natural resources, and even human lives. A higher density of development than currently exists on FCI Lands would create more Wildland/Urban Interface area which would be at risk of loss or damage due to wildland fire. Recent research in San Diego County (Syphard et al. 2013) indicates that "leapfrog" development – i.e. isolated clusters of development surrounded by undeveloped land, as is the case for the FCI Lands – is predicted to have the highest fire risk to the largest proportion of structures, while "expansion" or "infill" development are predicted to have lower risk. To summarize, increased development of FCI Lands could potentially lead to increased losses of structures, natural resources, and even human lives.

Increased development of the FCI Lands would require additional firefighting personnel and resources to address structure protection issues during wildland fire events. This would increase fire suppression costs significantly for the responsible agencies to upwards of $1M per day for large fires, while also putting more firefighters at risk. The need for structure protection can also divert resources away from a focus on putting out the fire. The lack of available water to aid fire suppression activities is another concern for increased development on FCI lands. Additional fire suppression and support resources would be required to address these issues even in the event of small wildland fires near FCI Lands.

Increasing the number of structures and residents on FCI Lands would lead to an increase in the number of human-caused fires. Well over 90% of all wildland fires in southern California are

human-caused. Due to the increased risk of human-caused fires, a significant investment in increased fire prevention activities would need to be made. This would include community fire prevention education programs, residential wildland fire safety hazard inspections, and residential burn permit inspections. The Cleveland National Forest does not currently have the staffing or budget capability to support this extra workload in our Direct Protection Areas.

Increased development on FCI Lands will create a need and want by residents for increased hazardous fuels reduction projects to protect structures in their vicinity. The Cleveland National Forest does not currently have the staff or financial capacity to accommodate additional fuels reduction projects for new developments, which would also render Forest lands less valuable for other uses and resources.

A higher population on FCI Lands would result in increased and significant difficulties for fire and law enforcement personnel relative to the evacuation of residents in rural or remote subdivisions. We consider the current road systems in and adjacent to FCI Lands to be of insufficient capacity to safely meet the needs of a large-scale evacuation in the event of a wildland fire. This would lead to increased safety issues associated with the egress of residents and ingress of responding fire and law enforcement personnel and equipment.

For any new developments on FCI Lands, it is critical that a minimum setback of 100 feet, and more in certain cases, be required for the construction of any structures adjacent to Cleveland National Forest lands in all areas. Defensible space for structures should be required, developed, and maintained solely on private land and should be the responsibility of property owners. The need for defensible space can extend beyond the minimum of 100 feet, especially along canyon rims and steep slopes.

Finally, it is worth noting that the Draft SEIR for this General Plan Update found that "implementation of the proposed Project would result in significant and unavoidable direct and cumulative impacts related to wildland fires." This refers specifically to "exposing people or structures to a significant risk of loss, injury, or death involving wildland fires," which would occur despite the implementation of mitigation measures. The acknowledgement of significant impacts relative to wildland fires suggests a transfer of fire risk from San Diego County to firefighting entities and future residents of FCI Lands.

Wildlife and Plants

Not only is San Diego County the most biodiverse county in the United States, this biodiversity is also among the most threatened nationwide. While the Cleveland National Forest is often viewed as a species refuge, this role would be compromised by increased development of FCI Lands due to habitat loss and fragmentation, introduction and spread of invasive species, and increased wildfire for ecosystems already threatened by overly frequent fire. These impacts could contribute to species extirpation as well as additional listings under the Endangered

Species Act. In the Alpine area, for example, the Hermes Copper Butterfly was added in 2011 to the list of candidate species for Endangered Species Act protection and would be further threatened by increased development. A scientific literature review by the Conservation Biology Institute (2005) for San Diego County found that biodiversity impacts for a range of species are discernable at the density of one dwelling unit per 40 acres and become progressively greater with increasing density.

Alternatives

The term "buffer" and its appropriate zoning became a focus of the San Diego County Planning Commission meetings in late 2013 regarding this General Plan Amendment for the Forest Conservation Initiative Lands. For the purposes of managing the Cleveland National Forest, the greater the minimum lot size of adjacent lands, the more effective the buffer they provide in terms of preventing resource impacts. As a result, we support the Environmentally Superior alternative analyzed in the Draft SEIR, since it would have the least impact on the Cleveland National Forest and the least fire risk. We also believe that this alternative would be most consistent with the following San Diego County General Plan Objectives: 1) promote environmental stewardship that protects the range of natural resources and habitats that uniquely define the County's character and ecological importance, and 2) ensure that development accounts for physical constraints and the natural hazards of the land.

Regarding the Staff Recommendation, we find that County staff have carefully balanced our concerns against community desires for growth. While its resource impacts to the Cleveland National Forest and fire risk would be greater than the Environmentally Superior alternative, lower densities for remote areas and along the Forest boundary would help to curtail impacts and fire risk. The Planning Commission Recommendation would impact the Cleveland National Forest to a greater degree than the Staff Recommendation, and the associated resource damage and fire risk would be substantial, particularly in the Alpine Planning Area.

Specific Areas

In the vicinity of Alpine Planning Areas of Consideration AL-3, 5, 6, 7, 8, and 11, management of Cleveland National Forest lands is already challenging due to the complex land ownership pattern. This would make habitat fragmentation even more likely to lead to losses of species diversity, and development effects would be magnified. The complex arrangement would also enable fires to spread more readily among the FCI Lands across vegetated Cleveland National Forest lands, as was recently seen with the Bernardo Fire.

The Interstate 8 travel corridor has a markedly high wildland fire occurrence history that would be problematic for increased development due to its close geographic relationship and increased fire threat to these lands. Moreover, much of the area proposed for increased development lies within or adjacent to the Sweetwater Canyon, which is oriented in a north-east by south-west

direction. This is particularly problematic from a wildland fire standpoint as the canyon funnels Santa Ana winds from the east/north-east as well as prevailing winds from the west/south-west, while the steep terrain enables fire to climb out of the canyon. There is considerable fire history in the area, including the Laguna, Viejas, and Cedar Fires, and some of the FCI Lands have burned as many as five times in the past 90 years.

The Pine Creek and Horsethief canyons and Wilderness lands to the east of AL-8 are similarly aligned with both Santa Ana and prevailing winds. Cleveland National Forest lands with heavy fuel loads in this vicinity make it particularly hazardous from a fire suppression standpoint. For all of the FCI Lands in the Alpine Planning Area, we consider the existing two-lane roads that funnel traffic to be insufficient for the widespread evacuations that would be needed for more residents in the event of a wildland fire. This situation would therefore complicate both ingress and egress, compromising public safety.

The Staff Recommendation would lead to resource impacts to the Cleveland National Forest and increased fire risk in the Alpine Planning Area, but not to the degree of the Planning Commission Recommendation. It is worth noting that even under the Staff Recommendation, the number of homes in the Alpine Planning Area could more than double the potential under FCI restrictions (2,910 versus 1,392, respectively), and so it is imperative that any development that occurs incorporate the greatest protections possible against wildfire and resource impacts.

Cuyamaca Planning Area of Consideration CU-1 and Jamul Planning Area of Consideration JD-1 lie among the most remote areas of the Cleveland National Forest. The parcels in CU-1 fall within the proposed Eagle Peak Recommended Wilderness area, which is in the final stage of adoption. Those in JD-1 lie between two existing Wildernesses, Pine Creek and Hauser, and are generally accessed by a narrow road that passes through Pine Creek Wilderness. Increasing the number of residents in such remote areas would affect the adjacent wilderness character, add to fire risk and other management challenges, and introduce new impacts to relatively intact lands. The minimum density (RL-80) recommended by Staff would minimize these impacts.

Thank you for considering our concerns and the importance of the Cleveland National Forest to San Diego County as you prepare for your decision about the fate of the FCI Lands. Please direct any questions about this matter to Jeff Heys, Forest Planner, at (858) 674-2959.

Sincerely,

William Metz

WILLIAM METZ
Forest Supervisor

References

Conservation Biology Institute. 2005. Analysis of General Plan-2020 San Diego County. Encinitas, California.

Syphard, A.D., A. Bar Massada, V. Butsic, and J.E. Keeley. 2013. Land use planning and wildfire: development policies influence future probability of housing loss. PLoS ONE 8(8): e71708. doi:10.1371/journal.pone.0071708.

California Native Plant Society

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February 29, 2016

Robert Citrano
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RE: Forest Conservation Initiative Lands (FCI) General Plan Amendment

Dear Mr. Citrano,

Thank you for the opportunity to comment on the Forest Conservation Initiative Lands (FCI) General Plan Amendment (GPA). The San Diego Chapter of the California Native Plant Society (CNPSSD) works to protect California's native plant heritage and natural ecology to preserve precious and often threatened resources for future generations. We work closely with decision-makers, scientists, and local planners to advocate for well informed and environmentally friendly policies, regulations and land management practices.

In general, we support the Environmentally Superior Modified FCI Condition Alternative. Our reason is that we believe the County generally underestimates the real impacts of climate change and extended drought. While we advocate for native plants and plant communities, we are also San Diegans, and putting people and plants in dangerous situations should be avoided. In this case, dangers include things like fire, for people living on the wildland-urban interface. Dangers include extended droughts, and their follow-on effects on groundwater uptake, reduced ability to fight fires due to reduced reservoirs, and extended drought causing people to abandon properties and move, as happened in the Dust Bowl. They also include the dangers of floods, especially when heavy rain falls on a drought-stricken landscape. For all these reasons, we urge the County to be conservative in its growth. Like it or not, growth in this County is a multivariate calculus that involves the long-term availability of water, power, and food. Growth is no more inevitable here than it was in Detroit or the Yucatan of the Classic Maya. We should be thoughtful about how we encourage people to put down roots here.

We also have comments on the FCI's handling of plants, plant communities, and greenhouse gases.

Dedicated to the preservation of California native flora

In regard to native plant species, our concerns and suggestions are as follows:

- Plant species need to be able to move to adapt to climate change. In past periods of climate change, as during the last ice age, native plant species survived by migrating, just as animals survived by migrating. Wildlife corridors should be designed so that native plants can migrate (by means of seeds) too. Basically, this means that plants need places to grow near wildlife corridors, that urban chokepoints (like concreted wildlife undercrossings) should be avoided where possible, corridors should not be part of brush management zones (since plants often do not survive being "brush managed"), habitat for pollinators and seed dispersers should be prioritized, and spraying of pesticides should be minimized or banned around critical corridors, so that plants can flower, be visited by healthy pollinators, set seed, and those seeds can spread. We suggest these ideas be incorporated into the Biology mitigation language.
- The GPA should clarify, both in the biology section (2.04) and especially the hazards section (2.06, p. 2.6-23 and elsewhere) that "flammable vegetation" is **not** synonymous with native plants. Research by CNPSSD chapter member Greg Rubin[1] strongly suggests that native plants in the landscaping are *less* flammable than non-native landscape plants like rosemary, lantana, and eucalyptus. We urge the County to make this explicit, in order to break the unthinking prejudice caused by outdated ideas that landscaping with native species is dangerous to people due to the risk of "brush" fires. Properly designed and maintained native landscaping is extremely safe, and we want people to be able to use it.
- We also strongly suggest that the County coordinate with local fire districts, the County Fire Authority, and CAL-FIRE, to determine whether the wildfire section in the document is up-to-date. We are hearing that major changes are being proposed (possibly to shift strategy from wide-scale clearances to fire-safe landscaping to protect live and property). *If* such changes are underway, the FCI GPA should mirror them, rather than using outdated guidance.
- Brush management zones should not be included in conservation areas. Too often, development goes up to property lines, and adjacent conservation areas are expected to bear the brunt of brush management to protect the new development, even when this impacts conservation goals. Buildings should be set back from the wildland-urban interface, so that the brush management areas are completely within the property boundary; . brush management should not be forced onto natural conservation areas because "managing" the brush reduces the value of the habitat. We suggest that Hazards Policy S-41 be amended to include language to this effect.

The current draft is incomplete with regards to vegetation impacts. While it lists the acres of habitat that will be impacted, Table 2.4-1 needs three more columns. First, we need to see how many acres of that habitat are within the proposed FCI footprint. Second, we need to see how many of those acres are available for mitigation, and third, we need to see the mitigation ratio for each vegetation type, and ideally the total amount of acres that would need to be mitigated for each vegetation impact. Thus, we can determine which vegetation impacts the County can mitigate for using current or future mitigation banks, and which are significant, unavoidable

[1] Rubin, Greg and Lucy Warren. 2013. *The California Native Landscape: The Homeowner's Design Guide to Restoring Its Beauty and Balance*. Timber Press.

impacts that cannot be mitigated. This information is critical to land use decisions going forward, and the FCI GPA is an ideal document in which to house this information.

Additionally, the County needs to help support monitoring of wildlands, especially wetlands, for new pests, pathogens, parasites, and invasive plants. Currently, this function is performed by a tiny staff of state agriculture specialists, contractors, personnel from various groups, and volunteers. Given the damage caused by newly spreading pests like the polyphagous shot-hole borer, which attacks many wetland trees *and* avocados and landscaping trees, the County needs to get involved in supporting efforts to detect, monitor, and control these problems, as existing efforts are inadequate. We suggest that language to that effect be included both in the Biology section (2.04) and in the Hazard section (2.06), and we are happy to work with staff on wording, if desired.

With regard to global climate change, we have the following concerns and suggestions:

- As CNPS was a co-plaintiff in the *Center for Biological Diversity et al. vs. California Department of Fish and Wildlife and Newhall Land and Farming Company* case ("Newhall Ranch"), we have to note that this case must be included in any analysis of climate change impacts, as it restricts what both the County and applicants may do. Specifically, the County's use of "900 metric tons carbon dioxide equivalent per year (MT CO2e/year) screening level to determine the need for additional analysis of GHG [greenhouse gas] emissions from a project," (p. 2.15-11) is not explicitly allowed under the ruling, and it may well face a future court challenge. This is additionally true, because, per the County's 2015 *Recommended Approach to Addressing Climate Change in CEQA Documents*, it is allowable to "amortize" GHG emissions over a fifty year period. In practice, this means that projects that emit up to 45,000 MT CO_2 the year they are built are proposed to have insignificant greenhouse gas impacts, because their emissions are amortized over 50 years and therefore considered to be (wrongly) insignificant in the year they are actually emitted. **We strongly urge the County to reconsider both its numerical threshold and especially amortizing emissions that will occur in a known year, to insure that this policy is consistent with the Newhall Ranch ruling**. This is an observation, not a threat. The County needs to insure that its guidelines can pass foreseeable legal challenges, so that project permits will not be invalidated by legal challenges to the way the County advises that greenhouse gas emissions are handled. Complying with the Newhall Ranch ruling is essential going forward.
- The County has missed one major source of CO_2 emissions: cement manufacture. The manufacture of one MT of conventional Portland cement emits between 0.9 and 1.1 MT of CO_2, and concrete can be up to 40% cement, although proportions vary substantially. **The County needs to include cement emissions in assessing impacts.** Methods for assessing emissions from cement production are available from the IPCC[2] and many other sources. One benefit of considering cement emissions is that the industry is trying to decrease cement emissions. Accounting for them is one way to encourage adoption of materials that emit less (or even absorb!) greenhouse gases.

[2] Good Practice Guidance and Uncertainty Management in National Greenhouse Gas Inventories. 2001. http://www.ipcc-nggip.iges.or.jp/public/gp/english/. Especially section 3.1.

- We strongly urge the County to abandon the 50 year amortization concept for greenhouse gas emissions. The critical threshold is 2°C warming on average global temperatures, and absent a major transformation of global civilization, we will pass that threshold in something like 20 years, not 50. At that point, the County faces major challenges. These include, in no particular order, loss of Colorado River water due to reservoir levels falling below intake pipes, loss of electrical power from Colorado River dams for the same reason, decreased water from California sources due to expected decade-long droughts (as we appear to be in now), major die-offs in agricultural crops, major die-offs of plants at the hotter ends of their geographic ranges, smaller and less predictable food supplies, and quite possible major human emigrations as San Diego becomes less hospitable.

Unfortunately, many major developers and many planning groups view the transformation to a decarbonized society as a threat to their way of life, rather than as a wonderful business opportunity to get rich saving the world, while building a livable future through invention, design, public engagement, and innovation. While changing peoples' world-view is beyond the scope of any planning document, we hope that the County can embrace the future and the need to transform, rather than endlessly tinkering with increasingly outdated 20th Century notions of planned sprawl that are increasingly maladaptive in our changing world. This is not to say that the FCI GPA should be thrown out, but we hope that the people involved in it can be encouraged to embrace both present reality and future challenges, rather than trying to replicate the worn-out plans of the past.

Thank you for the opportunity to comment on the FCI GPA. If you have any questions, comments, or concerns, please contact Frank Landis at 310-883-8569 (cell) or conservation @cnpssd.org. Please keep us informed of all future announcements, meetings, and documents related to this project.

Sincerely,

Frank Landis

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February 29, 2016

Via Electronic Mail Only

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Re: Forest Conservation Initiative Lands General Plan Amendment
Recirculated Draft Supplemental Environmental Impact Report

Dear Mr. Citrano:

We submit this letter on behalf of the Cleveland National Forest Foundation ("CNFF"), which promotes sustainable regional land use planning in order to stem the tide of urban encroachment into San Diego's backcountry. On behalf of CNFF, we submit these comments on the Recirculated Draft Supplemental Environmental Impact Report ("RDSEIR") for the Forest Conservation Initiative General Plan Amendment ("Project" or "FCI Amendment"). For all the reasons set forth below, it is our opinion that the RDSEIR does not comply with the requirements of the California Environmental Quality Act ("CEQA") (Public Resources Code section 21000 *et seq.*) and CEQA Guidelines (California Code of Regulations, title 14 section 15000 *et seq.*).

I. Introduction

The Forest Conservation Initiative is a voter approved initiative that required 72,000 acres of backcountry lands within the Cleveland National Forest to be designated with minimum lot sizes of 40 acres. Since the sunset date of the FCI Initiative, CNFF and Save Our Forest and Ranchlands ("SOFAR") have submitted comments to the County on previous iterations of this EIR that pointed out the documents' inadequacies. Unfortunately, this document perpetuates many of its predecessors flaws, particularly its

failure to adequately analyze and mitigate the Project's severe climate impacts and its treatment of alternatives to the proposed Project.

The proposed Project, in effect, expands the Village land use designations (formerly known as "country town" designations) outside of the established boundaries for the Village areas. Implementation of the Project will allow development to further encroach into stressed, fragile ecosystems within the Cleveland National Forest. This encroachment is not justified, especially given that the RDSEIR itself identifies the Modified FCI Condition alternative as reducing encroachment into forest areas and as environmentally superior. See RDSEIR at S-7 and 4-2. We see no reason why the County should be considering the proposed Project when there is clearly an environmentally superior option. New development can and should be accommodated inside the Village designated areas so that open space and forest land values can be preserved.

As previously submitted, CNFF requests that the County create a "forest" designator overlay district that would apply to all lands regardless of parcel size within the FCI planning area. See September 16, 2014 letter from SMW to B. Citrano and M. Fogg, attached as Exhibit A. As you know, CNFF supports minimum parcel sizes of at least 40 (or 80) acres outside country towns (villages) to protect forest values. The "forest" designator would serve as a "red flag" for landowners that seek to develop or subdivide properties in excess of the adopted FCI Amendment land use designations. The "forest" designator is fully consistent with the San Diego County Guiding Principles and would specifically reinforce Guiding Principles 2 (compact development within Village boundaries), 3 (vitalize existing communities), 4 (habitat protection), 5 (wildfire risk), 6 (promote public transportation), 7 (reduce greenhouse gas emissions), 8 (preserve agriculture), and 9 (reduce infrastructure costs).

This Project will have long-term consequences for the residents of San Diego County's backcountry and for the ecological health of the Cleveland National Forest. Those consequences include permanent loss of open space, increased edge effects, significant increases in traffic congestion, and increased air pollution and greenhouse gas emissions ("GHG"). Yet, this RDSEIR fails to adequately analyze and mitigate these significant impacts. Moreover, prolonged drought conditions have exacerbated limited water supplies in the backcountry. Despite these changed circumstances, the RDSEIR relies on the General Plan EIR's analysis of water supply impacts and fails to analyze current conditions.

II. The RDSEIR Fails to Adequately Analyze or Mitigate Climate Change Impacts.

The FCI Amendment would accommodate 6,245 new units at build-out, which would significantly increase the population in San Diego's backcountry. RDSEIR at 1-15. It is therefore unsurprising that the RDSEIR concludes that the Project will have a significant effect on climate change. RDSEIR at 2.15-16 and 2.15-20. With this significance determination comes CEQA's mandate to adopt feasible mitigation measures that would reduce or avoid the impact. CEQA Guidelines § 15126.3(a)(l); see also *Woodward Park Homeowners Ass'n, Inc. v. City of Fresno* (2007) 150 Cal. App. 4th 683,724 ("The EIR also must describe feasible measures that could minimize significant impacts."). Under CEQA, "public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects." *Berkeley Keep Jets Over the Bay Comm. v. Bd. of Port Comm'rs* (2001) 91 Cal.App. rh 1344,1354 (quoting Pub. Res. Code § 21002). Accordingly, CEQA requires lead agencies to identify and analyze all feasible mitigation, even if this mitigation will not reduce the impact to a level of insignificance. CEQA Guidelines Section 15126.4(a)(l) (A) (discussion of mitigation "shall identify mitigation measures for each significant environmental effect identified in the EIR").

Here, the RDSEIR's analysis of the Project's impacts on climate change fails to meet the requirements of CEQA because it fails to propose feasible mitigation measures to reduce the Project's significant impacts on climate change. Instead, the RDSEIR states that there are no feasible mitigation measures beyond the General Plan policies already identified. RDSEIR 2.15-16 and 2.15-17. This is simply not true. Because the Project's GHG emissions will cause a significant impact, the RDSEIR must analyze, and the County must adopt, *all* feasible mitigation to reduce those impacts.

The RDSEIR concedes that the Project "would generate a substantial amount of emissions over baseline conditions." RDSEIR at 2.15-14. The RDSEIR reveals that GHG emissions at build-out will increase to 178,534 million metric tons of carbon dioxide equivalent (MMT CO2e) annually. The RDSEIR also concedes that the proposed Project "would not meet the GHG standard necessary to comply with the 2020 statewide GHG emissions target" and "it is likely that the Project would not feasibly attain future GHG reductions needed to avoid the most severe climate impacts." RDSEIR at 2.15-17. Yet, despite the shocking increase in GHG emissions, and acknowledgement that implementation of the Project would mean that GHG targets will not be met, the RDSEIR fails to identify *any* feasible measures to reduce emissions beyond policies already in place. RDSEIR at 2.15-16 and 2.15-17.

Instead the RDSEIR implies that the County is excused from requiring more measures to reduce the Project's GHG emissions because the GHG emissions reduction goals are only achievable if state and federal authorities adopt new regulations and new technologies are developed. *Id.* However, the California Air Resources Board's ("CARB") updated Climate Change Scoping Plan relies on local government actions to "plan and build communities to reduce vehicular GHG emissions and provide more transportation options" as a key strategy to reduce the state's GHG emissions from transportation systems—which comprise a full 36 percent of total state emissions. Exhibit B, at p. 46. CARB also notes that "[t]he success of efforts to reduce GHG emissions within other economic or resource sectors such as water, energy, and transportation will be greatly improved by a transition to more sustainable land use practices in the years ahead." *Id.* at 104. Given CARB's reliance on local GHG reduction efforts, the RDSEIR may not conclude, as it does, that the ability of the proposed Project to achieve goals beyond 2020 is out of the County's control. RDSEIR at 2.15-16. *See Sierra Club v. Cnty. of San Diego,* (2015) 231 Cal.App.4th 1152, 1168 ("without local measures the requirements of Assembly Bill No. 32 will not be met"). Accordingly, the County may not avoid mitigating for Project's significant impacts related to GHG emissions. The RDSEIR must be revised to include feasible mitigations (such as requiring project-specific reductions) that result in a demonstrable reduction in emissions.

The RDSEIR dismisses potential mitigations by claiming that they are infeasible. However, the RDSEIR fails to provide evidence for these claims. For example, the RDSEIR states that mitigation requiring project-specific reduction percentages would be infeasible in part because the required reductions "would add development costs and requirements, which *could potentially* make development, although allowed by the Land Use Map, infeasible." RDSEIR at 2.15-28 and 29; emphasis added. The RDSEIR provides no evidence to support this statement. It includes no feasibility studies or cost-benefit analyses indicating that implementing such requirements would in fact be infeasible.

Next, the RDSEIR states that effective mitigation to reduce GHG emissions to a less than significant level for horizon years of 2030 and 2050 would need to be implemented for *all* projects, which would not be feasible. RDSEIR at 2.15-29; emphasis added. But this statement too is unsupported. First, as stated above, CEQA requires lead agencies to employ all feasible mitigation measures that would lessen impacts even if the impacts are not reduced to less-than-significant levels. CEQA Guidelines § 15091(a)(1); *see also id.* § 15126.2(b) (requiring an EIR to discuss "any significant impacts, including those which can be mitigated but not reduced to a level of insignificance." "A mitigation measure may reduce or minimize a significant impact without avoiding the impact

entirely." 1 Stephen Kostka & Michael Zischke, Practice Under the California Environmental Quality Act § 14.6 (2d ed. 2008). Second, the RDSEIR provides no basis for its statement that mitigation would need to be implemented for all projects, including ministerial actions. *Id.* While requiring identical mitigation for all projects may be preferable from a policy standpoint, the County may certainly impose different forms of mitigation for different types of development. In fact, such an approach makes sense in particular here, when protection of the County's most precious resource, the Cleveland National Forest, is at stake.

The RDSEIR points to the fact that the County is undertaking the preparation of a Climate Action Plan (CAP) that will address long-term GHG emissions County-wide. RDSEIR at 2.15-29. The RDSEIR implies that because the CAP will address future impacts related to GHG emissions, this EIR's failure to do so is excused. *Id.* First, it is unclear why the County is moving forward with this General Plan Amendment prior to preparation of a revised CAP. Given that the Project will result in substantial increases in GHG emissions, the County should postpone consideration of this Project until a CAP is prepared that identifies feasible measures that result in meaningful emissions reductions on FCI lands and beyond. However, in the absence of a CAP, the County should consider other measures to reduce GHG emissions. For example, The County could impose a moratorium on the development of FCI lands until a CAP is adopted. The County could impose 80-acre minimum parcel sizes outside the Village designated areas and direct more dense development to the more urbanized villages. Alternatively, the County could implement interim policies that apply to development on FCI lands until a CAP is adopted. Given the changed circumstances of prolonged drought conditions, limited water supplies, and increased wildfire risk, the County has every reason to give serious consideration to these mitigation measures.

Furthermore, the County has not demonstrated that the General Plan Measures the RDSEIR relies on can be enforced or will result in necessary emissions reductions, in violation of CEQA's requirements for enforceable and efficacious mitigation measures. Mitigation measures proposed in an EIR must be "fully enforceable" through permit conditions, agreements, or other legally binding instruments. Pub. Res. Code § 21081.6(b); CEQA Guidelines § 15126.4(a)(2). The RDSEIR relies on a number of General Plan policies and measures to mitigate significant environmental impacts. *See*, for example, RDSEIR at 2.15-21-2.15-23. Many of these General Plan policies and programs are vague, optional, directory, or otherwise unenforceable.

For example, the RDSEIR relies on General Plan Policy COS-20.2, which calls future preparation of a "program to monitor GHG emissions" as mitigation for any potential impacts related to GHG emissions. RDSEIR at 2.15-21. Because the RDSEIR

fails to provide enforceable measures and performance criteria for the proposed measure, there is no assurance the climate change impacts would be mitigated at all. *See Sacramento Old City Ass'n v. City Council* (1991) 229 Cal.App.3d 1011.

In another example, the RDSEIR relies on Mitigation Measure CC-1.1 which calls on the County to update the County Green Building Program to increase its effectiveness. RDSEIR at 2.15-22. But the RDSEIR fails to provide specific information on what elements of the program would be updated and how the update would result in reduced GHG emissions.

Similarly, Mitigation Measure CC-1.3 directs the County to "work with SANDAG to achieve regional goals in reducing GHG emissions associated with land use and transportation." *Id.* This measure is vague and unenforceable and fails to describe in any detail regarding specific changes to land use and transportation programs or performance criteria for the measure to ensure it will result in reduced emissions.

A general plan's goals and policies are necessarily general and aspirational. The City may rely on such policies to mitigate environmental impacts under CEQA, however, only if they will be implemented through specific implementation programs that represent a firm, enforceable commitment to mitigate. *See Napa Citizens for Honest Gov't v. Napa County Bd. of Supervisors* (2001) 91 Cal. App. 4th 342, 358 (citing *Rio Vista Farm Bureau Center v. County of Solano* (1992) 5 Cal. App. 4th 351, 377). CEQA requires that mitigation measures actually be implemented—not merely adopted and then disregarded. *Anderson First Coalition v. City of Anderson* (2005) 130 Cal. App. 4th 1173, 1186-87 ; *Fed'n of Hillside & Canyon Ass'ns v. City of Los Angeles*(2000) 83 Cal. App. 4th 1252, 1261 .

Here, the RDSEIR's vague, unenforceable, and noncommittal policies and programs (and policies for which no implementation programs are identified) allow the County to decide to take no action and thus fail to mitigate impacts. As a result, the RDSEIR cannot ensure that the policies relied on will in fact be implemented to mitigate the Project's impacts. Therefore they cannot serve as CEQA mitigation. *See Anderson First*, 130 Cal. App. 4th at 1186-87.

A recirculated EIR must propose feasible, enforceable mitigation measures that quantify their effects on GHG emissions. Until the County does so, the EIR for this Project will be legally inadequate.

III. The RDSEIR's "No Project" Alternative Continues to Present a False and Misleading Baseline.

Despite overwhelming authority to the contrary (*see* Exhibit A), the RDSEIR clings to its position that, upon the expiration of FCI, the land use designations reverted back to their pre-FCI designations. The "No Project" alternative, the RDSEIR concludes, would result in an onslaught of development and a slew of additional significant environmental impacts. RDSEIR at 4-4 and Table 4-4 at p. 4-97. The RDSEIR's analysis is not only legally incorrect—it is blatantly deceptive and designed to make the project and the EIR's alternatives look like compromise positions. They are not; the EIR must be revised to reflect the FCI condition, which is the true "No Project" alternative.

As explained in prior comment letters from CNFF to the County, there is nothing in the text of the FCI or the applicable statutes and case law that suggests that the land uses "reverted back" to pre-FCI designations on January 1, 2011. To the extent the County claims otherwise means it took a discretionary action to amend the General Plan without complying with CEQA. Therefore, the RDSEIR's alternatives analysis will remain legally inadequate until such time as the County prepares a revised EIR that properly describes and evaluates the No Project alternative as retaining FCI land use designations.

Finally, the County's theory that the pre-FCI land use designations will be reinstated after FCI's sunset undermines the long-term purpose of land use planning and sound planning principles. General plans do not terminate when they reach their scheduled horizon year. *See* Gov't Code § 65300 *et seq*. FCI's land use designations will simply continue until such time, if ever, that the County adopts new designations.

In sum, the RDSEIR's alternatives analysis is incomplete and misleading. When it is corrected, the County must recirculate the EIR so that the public can see and comment on the new analysis.

IV. The RDSEIR Continues the Drafts' Failure to Provide Adequate Analysis of Alternatives.

As we previously submitted to the County, CNFF commissioned an infill study to determine whether the County's anticipated growth in the backcountry could be accommodated in the cities. *See* Exhibit C "An Alternative Development Scenario for San Diego County", CNFF, July 2010. The answer is a resounding yes. However, the County pays short-shrift to this alternative. The County did not dispute the Infill's Study

conclusion but instead faults it for being out-of-scope since the County is re-designating only the FCI lands. RDSEIR at 4-16. This conclusion is wrong. Under CEQA the County may not segment the Project in such a way as to render certain potentially feasible alternatives infeasible; such a result violates CEQA's rules against piecemealing.

While the RDSEIR concedes that a City-Centered Alternative would reduce impacts on natural and agricultural resources, aesthetics, air quality, noise and traffic it prematurely dismisses that alternative without providing evidentiary support for its conclusion. RDSEIR at 4-15. Rather than conduct the analysis to determine the impacts resulting from this alternative, the RDSEIR dismisses further analysis of the City-Centered Alternative partially on the basis that such an alternative "would potentially result in greater impacts to air quality, traffic, and noise from increased construction and development in proximity to sensitive receptors…." Id. This conclusion is not based on any analysis and is not supported by evidence.

Moreover, the County misunderstands our point. The Infill Study demonstrates that the City-Centered Alternative is feasible since it shows that growth can and should be accommodated in the cities, not in the Forest. Such an alternative would reduce impacts related to land use, provision of public utilities and services, transportation, climate change, loss of habitat and biodiversity, loss of agricultural lands, water supply and water quality. We reiterate the request set forth by CNFF and SOFAR that the revised environmental document should further develop an Infill Alternative that embraces a forward-looking plan for land uses on FCI lands, designed to protect the environment and maintain quality of life for those living and working in the County.

V. The RDSEIR Fails to Analyze the Project's Energy Impacts

CEQA requires agencies to analyze whether their projects will result in the wasteful or inefficient use of energy. Pub. Res. Code § 21100(b)(3); CEQA Guidelines, Appdx. F. "Under CEQA, an EIR is 'fatally defective' when it fails 'to include a detailed statement setting forth the mitigation measures proposed to reduce wasteful, inefficient, and unnecessary consumption of energy.'" *Cal. Clean Energy Committee v. City of Woodland* (2014) 225 Cal.App.4th 173, 209 (quoting *People v. County of Kern* (1976) 62 Cal.App.3d 761, 774). In order to demonstrate that a project will not result in the wasteful use of energy, agencies must show that the project has decreased per capita energy consumption, decreased reliance on fossil fuel use and increased reliance on renewable energy sources. *Id.* The RDSEIR fails entirely to include this analysis. A revised EIR must analyze the Project's impacts on use of energy and identify feasible measures to reduce energy usage.

VI. Conclusion

Thank you for your consideration of these comments. We respectfully request that no further consideration be given to the Project as proposed until an EIR is prepared that fully complies with CEQA. The voters spoke loudly when they overwhelmingly approved FCI in 1991: The Cleveland National Forest is our County's legacy. We sincerely hope that you will hear the call to protect it.

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP

Catherine C. Engberg

Catherine C. Engberg

Carmen J. Borg

Carmen J. Borg, AICP
Urban Planner

List of Exhibits

Exhibit A	Letter from SMW to B. Citrano and M. Fogg (September 16, 2014)
Exhibit B	Climate Change Scoping Plan (May 2014)
Exhibit C	An Alternative Development Scenario for San Diego County (July 2010)

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September 16, 2014

Via E-Mail and U.S. Mail

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Re: FCI Amendment - Follow-up from September 4, 2014 meeting

Dear Bob and Mindy:

We write to thank you for meeting with Cleveland National Forest Foundation representatives on September 4, 2014 to discuss the Forest Conservation Initiative (FCI) Amendment. We found that we agree on a number of issues regarding resource constraints and planning objectives for the Cleveland National Forest. As we discussed, numerous factors—including the need to plan for limited water supply, wildfire risk, and habitat protection—prompted San Diego County voters to overwhelmingly adopt FCI in 1993. Add today's pressing challenge of climate change, and FCI's policies are all the more relevant in 2014.

Our September 4 discussion focused on two key issues. First, CNFF urges the County to reinforce these key policies regarding water supply, wildfire risk, habitat protection and climate change by adopting an overlay "forest" designator, as detailed below. Second, CNFF continues to dispute the County's description of the land use planning status quo, specifically the County's conclusion that FCI's land use designations "reverted back" on January 1, 2011 to their pre-FCI densities. We therefore urge the County to analyze the "FCI Condition" as the "No Project" alternative in the Revised Draft SEIR for the FCI Amendment.

Forest Designator

CNFF requests that the County create a "forest" designator overlay district that would apply to all lands regardless of parcel size within the FCI planning area. As you know, CNFF supports minimum parcel sizes of 40 (or 80) acres outside country towns (villages) to protect forest values. The "forest" designator would serve as a "red flag" for landowners that seek to develop or subdivide properties in excess of the adopted FCI Amendment land use designations. The "forest" designator is fully consistent with the San Diego County Guiding Principles and would specifically reinforce Guiding Principles 2 (compact development within Village boundaries), 3 (vitalize existing communities), 4 (habitat protection), 5 (wildfire risk), 6 (promote public transportation), 7 (reduce greenhouse gas emissions), 8 (preserve agriculture), and 9 (reduce infrastructure costs).

While there are numerous ways to craft such a "forest" designator, we recommend that the County require that the following findings be made before land could be subdivided or developed in a manner inconsistent with any adopted FCI Amendment:

1. The project has adequate water supply by virtue of the property being within or annexed to appropriate service districts. *See* Guiding Principle #2 and 9.

2. Approval of the project would not exacerbate wildfire risk. *See* Guiding Principle #5.

3. The proposed use and density are compatible with the environmental resources of the Cleveland National Forest and will not adversely affect the stability of land use patterns in the area. *See* Guiding Principles # 2 and 4.

4. The project would employ "carbon neutral" principles, including integrating passive design strategies, specifying energy efficient HVAC systems, lighting and appliances; and installing on-site renewable energy. *See* Guiding Principle #7.

5. The approval will not constitute part of, or encourage, a piece-meal conversion of a larger Cleveland National Forest area to residential or other non-open space uses. *See* Guiding Principles # 2 and 3.

In short, the FCI Amendment must be viewed first and foremost as a Forest Plan. We urge the County to develop a "forest" designator to reinforce the importance of

the Cleveland National Forest to the County's environmental and economic well-being and to reinforce its adopted General Plan Guiding Principles.

As a resource, we attach a description of the "forest" designation from Sierra County's General Plan. *See* Attachment 1. This designation protects forest lands through large minimum parcel sizes and policies to prohibit incompatible uses. Sierra County wisely applies its large parcel zoning where warranted by resource constraints and environmental values, even though smaller lots may exist. The Sierra County General Plan and Zoning Code implement policies to ensure that smaller lots are declared legal nonconforming. *See* Attachment 1 (General Plan policies 28 and 29); Attachment 2, Sierra County Code § 15.40 (Non-conformance).

In addition, we attach relevant portions of the City of Portland's Environmental Protection Zone ordinance. *See* Attachment 3. The "EPZ" overlay zone provides the highest level of protection to the most important resources and functional values. These resources and functional values are identified and assigned value in the inventory and economic, social, environmental, and energy (ESEE) analysis for each specific study area.

DEIR No Project Alternative

As you know, FCI was passed by two-thirds of County voters in 1993. It adopted 40-acre minimum parcel size for all private in-holdings within the Cleveland National Forest and remained in effect until December 31, 2010. The County takes the position that on January 1, 2011, all FCI lands reverted to their pre-FCI designations. According to the June 25, 2014 staff report for the FCI Amendment, the difference between these two land use regimes is staggering. The "Pre-FCI" buildout is 16,203 units, compared to 4,260 units under FCI.

As we discussed, CNFF urges the County to analyze the FCI Condition as the No Project alternative in the Revised Draft SEIR. We understand that County Counsel has shifted responsibilities among its deputies on issues involving FCI. As background, we therefore attach CNFF's prior letters explaining our legal position. *See* Attachments 4, 5, and 6 (letters dated March 18, 2013, December 7, 2010, March 12, 2009). To summarize, CNFF's legal conclusion is based on the following:

1. *Plain text and legislative history.*

FCI expressly "repealed" the pre-FCI land use designations that would have allowed, under the County's recent tally, 16,203 units at buildout. It provides no mechanism for reinstatement of these old designations. FCI's legislative history confirms this reading. Voters (even those against the measure) thought that FCI "wiped out" the pre-FCI land use designations.

2. *General plans are forward-looking, not backward-looking.*

General plans guide future development; they never revert to earlier land use designations. For example, when a court invalidates a general plan, the Planning and Zoning Law provides the remedy, which is to suspend the local government's development approval authority—not to revive a pre-existing general plan. *See* Gov. Code section 63755; *see also Harroman v. Town of Tiburon* (1991) 235 Cal. App. 3d 388 (development that is inconsistent with draft general plan update may not proceed regardless of its consistency with outdated existing general plan). The same is true with respect to "outdated" housing elements—the old housing element never springs back. Instead, the jurisdiction loses its authority to disapprove low-income housing. *See* Gov. Code § 65589.5(d) (Anti-NIMBY law); *see also San Mateo Coastal Landowners' Association v. County of San Mateo* (1995) 38 Cal. App. 4th 523, 544-45 (County's failure to update its Housing Element in conformity with statutory timetable did not automatically invalidate the Housing Element general plan of which the Housing Element was a part).

3. *Government Code section 9611 is inapposite.*

The County appears to take the position that Government Code section 9611, which applies to state statutes, applies to local general plans. It does not. Section 9611 provides for revival of a prior state statute when the Legislature replaces the prior statute with a temporary statute. It has never been applied to find revival of a local measure, much less a (forward-looking) General Plan land use map. *Cf. MHC Financing Ltd. v. City of Santee* (2005) 125 Cal. App. 4th 1372, 1382 n.7 (dicta expressing skepticism that section 9611 has any application to zoning ordinances). The County's rote application of Government Code section 9611 also ignores the Election Code provisions governing initiatives. These sections bolster CNFF's position that FCI's sunset clause merely removed the voter approval requirement, but did not contemplate revival of pre-FCI land use designations.

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& WEINBERGER LLP

As a practical matter, it appears that the County could analyze the FCI Condition without substantial additional work. The County has determined FCI's buildout potential (4,260 units). Moreover, according to the February 2013 Draft SEIR for the FCI Amendment, the County already prepared much of the analysis in the EIR for the County General Plan Update. *See* Draft SEIR at 1-8 (GPU's traffic analysis assumed FCI condition) and 1-9 (FCI buildout assumed at 4,108 units, which is awfully close to 4,260 units).

In summary, we welcome continued dialogue with County staff and decisionmakers regarding the FCI Amendment. Do not hesitate to contact me or any other CNFF representative present at the meeting to continue the discussion.

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP

Catherine C. Engberg

cc: Bill Witt, Deputy County Counsel

624167.4

May 2014

First Update to the

Climate Change Scoping Plan

Building on the Framework

Pursuant to AB 32

The California Global Warming Solutions Act of 2006

PECHANGA CULTURAL RESOURCES
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February 29, 2016

VIA E-MAIL and USPS

Mr. Robert Citrano
County of San Diego
Planning and Land Use
5510 Overland Avenue, Ste 100
San Diego, CA 92123-1666

Re: Pechanga Tribe Comments on the Draft Supplemental Environmental Impact Report (DSEIR) for the Forest Conservation Initiative (FCI) Lands Project (GPA 12-004)

Dear Mr. Citrano:

This comment letter is written on behalf of the Pechanga Band of Luiseño Indians (hereinafter, "the Tribe"), a federally recognized Indian tribe and sovereign government. The Tribe formally requests, pursuant to Public Resources Code §21092.2, to continue to be notified and involved in the entire CEQA environmental review process for the duration of the above referenced project (the "Project"). Please also incorporate these comments into the record of approval for this Project.

The Tribe submits these comments concerning the Project's potential impacts to cultural resources in conjunction with the environmental review of the Project and to assist the County in developing appropriate avoidance and preservation standards for impacts to Cultural Resources. The Tribe has reviewed the Draft Supplemental Environmental Impact Report (DSEIR) and thanks the County of San Diego for including standard policies relating to the Resource Protection Ordinance (RPO) and cultural/historic resource protection mitigation measures.

The Tribe met with the County for our SB18 government-to-government consultation on September 26, 2012 and submitted our DSEIR comments for this Project on March 18, 2013. The County did not conduct additional consultation with the Tribe until we received the second notice of availability for DSEIR. We understand from our initial meeting and our review of the DSEIR that overall, the proposed densities of the former-FCI lands will be reduced, which will result in reduced environmental impacts. The Tribe is primarily concerned about lands that are in the Pendelton/DeLuz CPA and the North Mountain Subregion areas and this time we are encouraged that the proposed development impacts to these areas will be reduced overall.

The DSEIR states that there will be impacts to cultural resources should these lands be developed. Further, it states that direct, indirect and cumulative impacts to archaeological resources associated with the proposed Project would be reduced to below a level of significance with implementation of the 2011 General Plan policies and mitigation measures. The Tribe informs the County that unless cultural resources are entirely avoided and preserved, which is the preferred mitigation under CEQA, any impact is considered significant. Only preservation through avoidance can fully reduce any impacts to cultural resources to a less than significant level.

Additionally, the Tribe would like to emphasize that no project evaluation is complete without contacting and consulting with tribes early in the application/development process. Tribal knowledge is often more extensive than what can be identified in archaeological institutions and records. As such, consultation for projects in the identified areas of concern are essential to understanding the suite of impacts that may occur to cultural resources. The Pechanga Tribe has a wealth of information that is not available through public information and our information provides a larger, fuller picture of the landscape and ties in the physical remains (archaeological sites) with named places, Traditional Cultural Properties (TCP's), tribal cultural resources (TCRs) and other cultural data. Tribes can also assist archaeologists with answering research questions and determining the significance of physical remains.

Based upon our concerns presented above, the Tribe suggests that the proposed mitigation measures be revised to include more tribal involvement and consultation requirements so that a broad analysis of cultural resources can be included for future implementing projects.

Cul-2.5 Protect undiscovered subsurface archaeological resources by requiring grading monitoring by a qualified archaeologist and a Native American monitor for ground disturbing activities in the vicinity of known archaeological resources, and also~~, when feasible,~~ during initial surveys.

Cul-2.6 Protect significant cultural resources by facilitating the identification and acquisition of important resources through regional coordination with agencies, and institutions, such as the SCIC and consultation with the NAHC and local tribal governments, including AB 52 and SB-18 review, while maintaining the confidentiality of sensitive cultural information.

Cul-4.2 If human remains are encountered, California Health and Safety Code Section 7050.5states that no further disturbance shall occur until the San Diego County Coroner has made the necessary findings as to origin. Further, pursuant to California Public Resources Code Section 5097.98(b) remains shall be left in place and free from disturbance until a final decision as to the treatment and disposition has been made. If the San Diego County Coroner determines the remains to be Native American, the Native American Heritage Commission must be contacted within 24 hours. The Native American Heritage Commission must then

immediately identify the "most likely descendant(s)" of receiving notification of the discovery. The most likely descendant(s) shall then make recommendations within 48 hours, and engage in consultations concerning the treatment of the remains as provided in Public Resources Code 5097.98.

The Tribe reserves the right to fully participate in the environmental review process, as well as to provide further comment on the Project's impacts to cultural resources and potential mitigation for such impacts.

The Pechanga Tribe looks forward to working together with the County of San Diego in protecting the invaluable cultural resources found within the County boundaries. Please contact me at 951-770-8113 or at eozdil@pechanga-nsn.gov if you have any comments or questions. Please also forward a copy of the final DSEIR to us for our review and files. Thank you.

Sincerely,

Tuba Ebru Ozdil
Planning Specialist

cc: Pechanga Office of the General Counsel
Donna Beddow, County Archaeologist/DPLU

Lael Montgomery
13678 McNally Road
Valley Center, CA 92082

February 28, 2016

Robert Citrano
County of San Diego
Planning and Development Services
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5510 Overland Avenue, Suite 310
San Diego, CA 92123
E-Mail: robert.citrano@sdcounty.ca.gov

RE: Forest Conservation Initiative Lands General Plan Amendment Recirculated Draft Supplemental Environmental Impact Report

Dear Mr. Citrano,
This General Plan Amendment is one of many being proposed that expand the Village land use designations outside the boundaries for the Village areas in the County's relatively new General Plan. The Cleveland National Forest Foundation has written repeatedly, and I agree with their view, that approval will allow development to further encroach into stressed, fragile ecosystems within the Cleveland National Forest.

This encroachment is not justified. The RDSEIR identifies the Modified FCI Condition alternative as reducing encroachment into forest areas and as environmentally superior. See RDSEIR at S-7 and 4-2. The County should NOT be considering the proposed Project when there is clearly an environmentally superior option. New development can and should be accommodated inside the Village designated areas so that agriculture, open space and forest land values can be preserved.

The County should NOT be considering any amendments that add thousands of houses in rural areas to the 2011 County General Plan which already accommodates some 70,000 new units – and in areas where infrastructure, transit, jobs, shopping, civic facilities and other urban amenities are planned, or already exist.

I support CNFF's recommendation to create a "forest"designator to overlay all lands regardless of parcel size within the FCI planning area. CNFF supports minimum parcel sizes of at least 40 (or 80) acres outside country towns (villages) to protect forest values. As CNFF has written, again repeatedly and I think wisely, the "forest" designator would serve as a "red flag" for landowners that seek to develop or subdivide properties in excess of the adopted FCI Amendment land use designations. The "forest" designator is fully consistent with the San Diego County Guiding Principles and would specifically reinforce Guiding Principles 2 (compact development within Village boundaries), 3 (vitalize existing communities), 4 (habitat protection), 5 (wildfire risk), 6 (promote public transportation), 7 (reduce greenhouse gas emissions), 8 (preserve agriculture), and 9 (reduce infrastructure costs).

What is the point of planning if the plans are ignored? As it is, San Diego County's flaccid enforcement of its own General Plan encourages windfall speculation in wild lands we MUST protect while it discourages responsible investment in city-building.

Sincerely,

Lael Montgomery

SWEETWATER AUTHORITY
505 GARRETT AVENUE
POST OFFICE BOX 2328
CHULA VISTA, CALIFORNIA 91912-2328
(619) 420-1413
FAX (619) 425-7469
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ASSISTANT GENERAL MANAGER

February 29, 2016

Mr. Robert Citrano
County of San Diego
Planning & Development Services
5510 Overland Ave., Suite 310
San Diego, CA 92123

Subject: COMMENTS ON DRAFT REVISED SUPPLEMENTAL EIR
GPA 12-004, FOREST CONSERVATION INITIATIVE LANDS
SWEETWATER RIVER WATERSHED PROTECTION

Dear Mr. Citrano:

Thank you for providing notification to Sweetwater Authority (Authority) on the Draft Revised Supplemental Environmental Impact Report (SEIR) for the Forest Conservation Initiative (FCI) Lands General Plan Amendment, GPA 12-004. Sweetwater Authority is a public water agency in the South Bay area of San Diego County serving approximately 191,500 people residing in National City, the western and central portions of Chula Vista, and Bonita. The Authority operates Sweetwater Reservoir in Spring Valley and Loveland Reservoir in Alpine to store local and imported water for its customers and utilizes the Sweetwater River to transfer water from Loveland Reservoir to Sweetwater Reservoir. The proposed project would potentially affect the former FCI lands and adjacent private lands in San Diego County, including areas within the 230-square-mile Sweetwater River watershed.

We have reviewed the Draft Revised SEIR, Land Use maps, and supporting documents and have the following comments:

2.7.4.1. Water Quality Standards and Requirements

The Authority recommends updating Mitigation Measure Hyd-1.10 (p. 2.7-18). This Mitigation Measure requires coordination with the State Water Resources Control Board to develop statewide performance and design standards for conventional and alternative Onsite Wastewater Treatment Systems (OWTS). The document states that when alternative OWTS are permitted, implementation of this Mitigation Measure will help prevent potential conflicts with applicable standards and regulations. However, it is our understanding that the County Code was amended in 2015 to include supplemental treatment systems, and this amendment was completed through a Local Agency Management Program (LAMP) for OWTS approved by both the Regional Water Quality Control Board and the County Board of Supervisors. A copy of the document is enclosed. The LAMP is designed to protect surface water bodies and groundwater sources from contamination through the proper design, placement, installation,

maintenance, and assessment of individual OWTS and should be incorporated in Mitigation Measures for GPA 12-004. Because the Authority derives up to 70 percent of its potable water from local sources, including groundwater and surface water runoff to the Sweetwater River, water quality impacts could potentially carry significant ramifications for the Authority's water supply and customers.

Alpine Land Use Map

The Alpine Land Use map (AL-propproj) includes an incorrect land use designation for Assessor's Parcel Number 520-100-12-00. This parcel, shown on enclosed Figure 1-2A, has been under the Authority's ownership since 2013 and should be designated as Public Agency Lands instead of the proposed Rural Lands (RL-40) designation shown on the map.

We appreciate the opportunity to comment on the Draft Revised SEIR for the FCI Lands General Plan Amendment. Please continue to include the Authority on the County's distribution list for GPA 12-004. If you have any questions, please contact Jane Davies at jdavies@sweetwater.org or (619) 409-6816.

Sincerely,

Scott McClelland, P.E., BCEE
Director of Water Quality

Enclosures

County Of San Diego
Department of Environmental Health
Land and Water Quality Division

Local Agency Management Program (LAMP) for Onsite Wastewater Treatment Systems

February 24, 2015
Final

February 24, 2015

GERALD W. FISHER
23550 Hwy. 76 Santa Ysabel, CA 92070♦Phone 760-782-9208♦Fax 760-782-0824♦jfisher760@aol.com

Planning and Development Services
Attn: FCI Lands General Plan Amendment
5510 Overland Ave., Suite 310
San Diego, CA 92123

February 26, 2016

Re: Fisher Property – APN 135-320-02-00 and 136-210-01-00

Dear Mr. Robert Citrano,
Thank you for providing information of FCI Lands.

The timing, coincidentally, seems excellent to deal with another EIR-type event – the imposing Northern Route of the SDG&E Sunrise Powerlink line TL682.

As you know, the increased easement size to accommodate the 500KW lines, supported by CPUC Rule 95, Sec. 35, allows SDG&E to **cut to bare earth** everything, to the last blade of grass, a swath twice **as wide as the distance between poles – 800-1000 feet±!!**

Due to the uniqueness, layout, and location of our property, with this probability, it could completely destroy an entire oak grove and the habitats of hundreds of animals – it would be a "taking" far in excess of the "down-zoning" being proposed.

Could I please request a "helpful discretionary hat" be put on?
I believe the following will be beneficial to all parties, without taking from another, and still stay within everyone's guidelines, such as your CDM.

First, please review maps A & B. Keeping with the "Big Picture" from say 20,000 ft., our property has some aspects that are unusual: (a) though relatively small, it has 9 conflicting interests – state, federal, BLM, two planning groups, Tree of the U.S., MSCP, owner, fauna; (b) elevation/terrain (2500±MSL vs. 6500±MSL); water availability; (c) major east/west highway.

Second, Highway 76, as a designated "Scenic Highway", the legislation clearly supports/mandates the undergrounding of utilities. The County, as a fellow landowner (school to the east), together with CNF (really not needed), Rey River Ranch, La Jolla Indian Reservation, all supporting at no cost, can enjoy this benefit.

[Note]: AT&T has already set a precedent by burying their lines in the highway. SDG&E has agreed to underground this new line on the contiguous La Jolla

Reservation (gas station, store, campground, motocross), also setting a precedent.
The elevation all along the road raises our property, like a shelf, which puts it at risk for SDG&E to do the Rule 95 game.

Third, a creek runs near a pole. The biological/environmental damage due to the anchors needed for the poles would expand SDG&E damage all along its easement in this canyon area of the San Luis Rey River.

[Summary]:
By returning our property to the 1DU/8AC and recognizing the 2 MUP's, SDG&E will be further encouraged to move into the highway to place their lines, vs. condemnation.

The benefit to SDG&E is there is no restriction on size of line. Current EIR is still in question. No maintenance cost for easement. SDG&E can take credit for "beautifying the landscape". SDG&E can take credit for the "ultimate fire protection" they will be providing.

San Diego County will enjoy the elimination of concerns over electromagnetic fields from 500KW± lines harming their children. San Diego County can enjoy, with no subsidy, 50-80± **Affordable Housing homes** that could be built by any owner of our property without being first transferred to Indian exemption. Note: We would accept the original 1DU/8AC, with a condition that homes be "green", the value be "affordable", water be, as it has been and is now, from the mountain, any oak tree disturbed be mitigated by 2 to 1 on westerly portion where dozer work during the '07 fires wiped out many oaks.

Mr. Citrano, the CDM process appears to try to be fair to the people. Our property, to many, would seem to be like some in the Middle East, with warfare and conflict coming at it from all sides. Some solutions would be the equivalent of taking off a complete hand in place of a "fingernail trim".

I pray "County Discretionary Power" will be like the good Lord parting the Red Sea for His people.

Respectfully submitted,

Gerald W. Fisher -T^

Gerald W. Fisher, Trustee

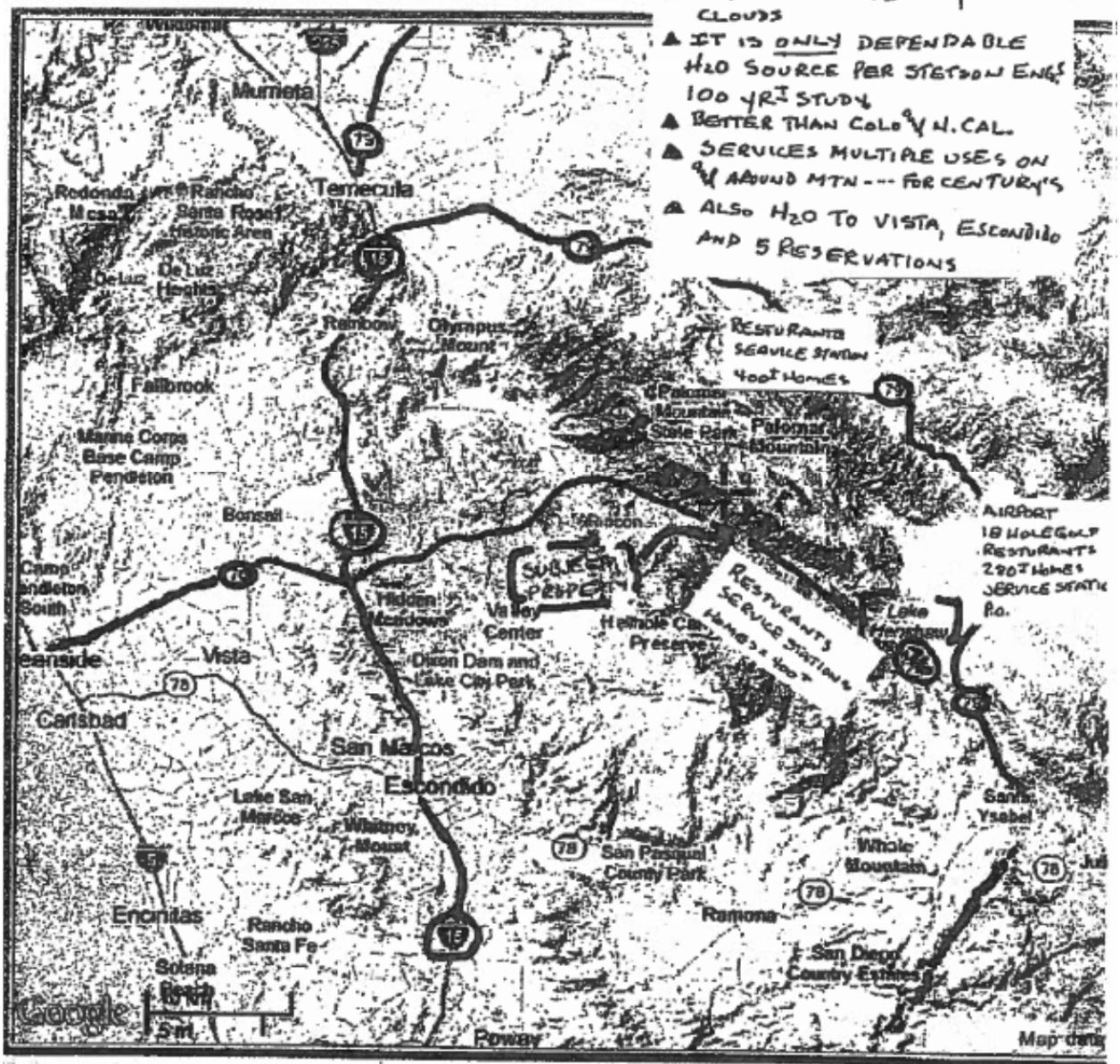
[MAP A]

a) Enter location (decimal degrees, use "-" for S and W): latitude: longitude:

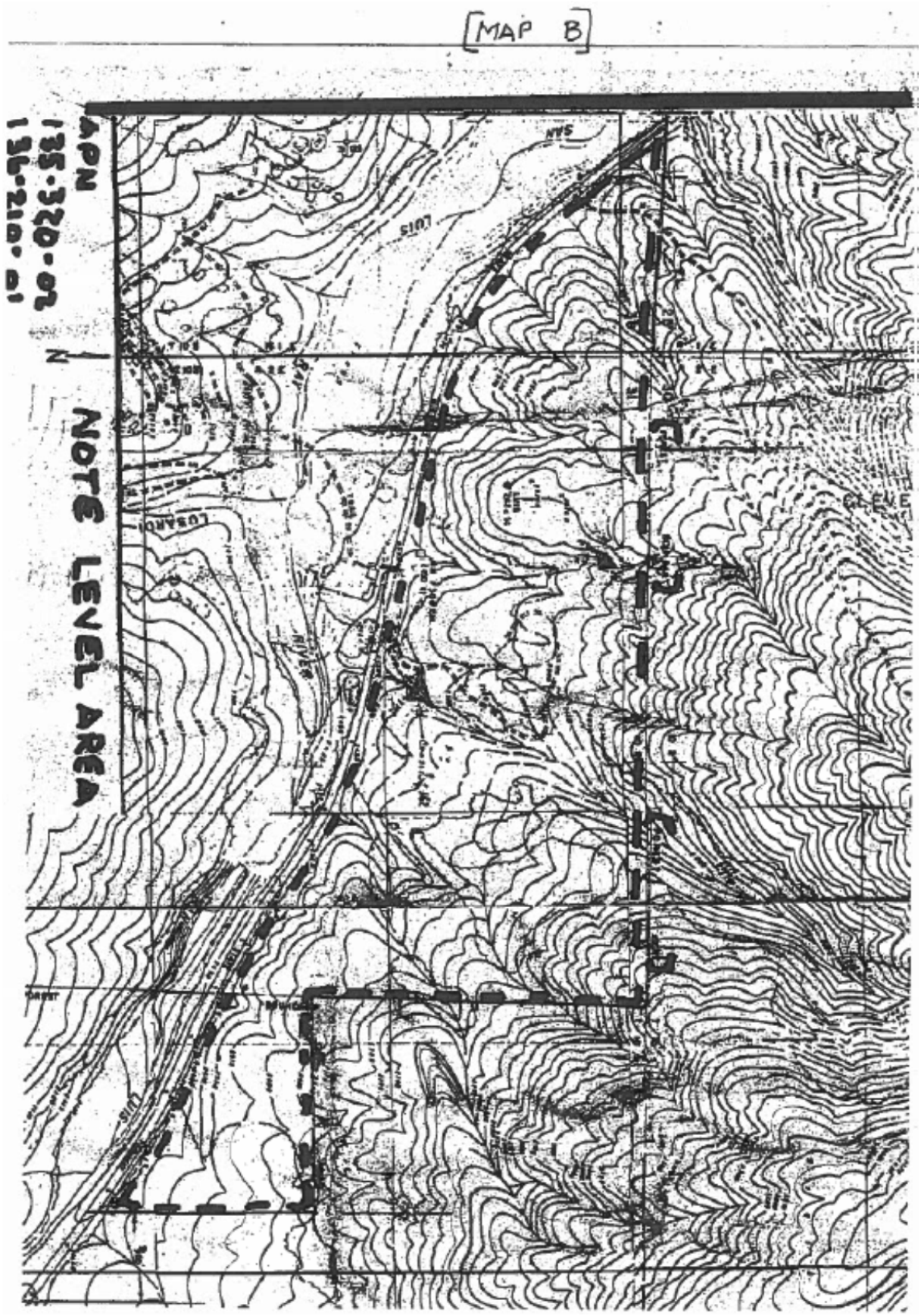
b) Select station: select station

2. Use map:

PALOMAR MTN
- 5x 20 MILES± WATER MAKER
- SQUEEZES H_2O BY UPLIFTING CLOUDS
- IT IS ONLY DEPENDABLE H_2O SOURCE PER STETSON ENG'S 100 YR STUDY
- BETTER THAN COLO & N. CAL.
- SERVICES MULTIPLE USES ON & AROUND MTN --- FOR CENTURY'S
- ALSO H_2O TO VISTA, ESCONDIDO AND 5 RESERVATIONS



POINT PRECIPITATION FREQUENCY (PF
WITH 90% CONFIDENCE INTERVALS AND SUPPLEMENTAR
NOAA Atlas 14, Volume 6, Version 2


[MAP B]
APN
135-320-02
135-210-01
N
NOT A LEVEL AREA

SAVE OUR HOME AND LIVES
FISHER YARD

Department of Planning and Development Services

5510 Overland Ave. Ste. #300

San Diego, CA 92123

RE: APN 523-150-10 and 524-031-19

Attn: Mr. Peter Eichar

January 19, 2016

TO WHOM IT MAY CONCERN:

My mother is Dorthiea Hinkle, owner of the afore-mentioned properties. At her age, she is unable to manage and care for the property that has been in our family for over 20 years. She has attempted to sell it as a ranch with, really, little or no development potential, and there is no market for that. There is also no market, from what I can tell, for 40 acre "ranch-ettes". Even if one had the money to subdivide, the infrastructure needed to reach the individual properties would leave nothing in the deal for the land owner.

I encourage my mother to support the plan shown in Figure 4-3A which was adopted by the San Diego County Planning Commission. It would allow her more lots and the ability to cluster them all on her relatively flat front 60 acres. This is in keeping with the neighborhood south of Japatul Spur, much of which had subdivided to this density before the FCI was initiated.

I therefore support the "Alpine Land use Alternative Map Figure 4.3 A", and do NOT support the "Mid Density Plan" that calls for 40 acre minimum over the entire property.

Thank you,

Becky Davis

Becky Davis

Dorthiea Hinkle

3007 Blue Oak Court

Spring Valley, CA 91978

Department of Planning and Development Services

5510 Overland Avenue Suite 300

San Diego, CA 92123

RE: APN(s) 523-150-10 and 524-031-19 January 19, 2016

TO WHOM IT MAY CONCERN:

My name is Dorthiea Hinkle. I am over 90 years of age, and have lived on this property (until recently) for over 20 years. My husband, Al Hinkle, owned this land when I married him in 1993. It is not easy to manage and maintain properties of this size. They are too small to ranch efficiently, and too large for a home. Forty acre minimum, with the cost to run roads and water, would leave you nothing for value in the land. I feel like that I know every nook and cranny of that land. I have explored the gold mine which was a delight for the children and their friends; and I have found beauty in the wilder, more secluded parts of the property.

But, people do not seem to want to hold or care for large pieces of property anymore. When Al acquired it, he believed in its future development opportunities. County regulations have severely limited that potential. I see my neighbors confronted with the same quandary. That is why I have decided that I can accept the compromise offered by the Planning Commission that, I am told, provides 20 acre minimum over about 60 of my front acres, and would leave the balance of the land untouched. That is reflected, I believe, in Figure 4-3A of the "Alpine Land Use Alternative Map". I have been told that "clustering" lots on the front 60 acres will be allowed, and this would enable me to have 7 viable lots of an 8 acre size.

I may never develop this property, but it is what I hope to leave to my children. And, as I feel I have been a good steward of the land up until now, I would like to be assured that the greatest potential of the land is achieved, while maintaining its' wild beauty in other areas.

Thank you for your attention to my concerns.

Dorthiea E Hinkle

Dorthiea Hinkle

Janice C and Colin L Campbell
3535 Alpine Boulevard
Alpine, CA 91901-2301

January 27, 2016

Department of Planning and Development Services
5510 Overland Ave. Ste. 300
San Diego, CA 92123
Attn: Mr. Peter Eichar

Subj: Comments on the Forest Conservation Initiative (FCI) General Plan Amendment (GPA) Draft Supplemental Environmental Impact Report (SEIR) recirculated by the Planning & Development Services (PDS) in January 2016 on the VR-2 and Rural Commercial reclassification for the Augustyne-Kaderabek property.

Dear Mr. Eichar:

Our property located at 3535 Alpine Boulevard is surrounded on 3 sides by the Augustyne-Kaderabek holding. Because we have a similar expectation for the future development of our area, we hope to work in a compatible manner with our neighbor and the county to realize a sensible plan.

Consequently, we approve the reclassification shown on all pertinent maps for a designation of VR-2 and Rural Commercial on the Augustyne-Kaderabek properties. We believe we are the only residential neighbor to the proposed Rural Commercial, and we see it as a benefit; given its proximity to the West Willows off ramp.

We are glad to see the SEIR finally going forward, and we look forward to its final resolution before the San Diego County Board of Supervisors in 2016.

Thank you for your attention to our comments.

Sincerely,

Janice C Campbell

Colin L Campbell (Sr)

Charles Kaderabek & Lynn Augustyn

DEPARTMENT OF PLANNING AND DEVELOPMENT SERVICES
5510 Overland Ave. Ste 300
San Diego, CA 92123
Attn: Mr. Peter Eichar
RE: APNs 404-231-03 and 404-240-18
January 21, 2016

TO WHOM IT MAY CONCERN:
As the owner of these parcels totaling 78.42 acres, we have been working for several years toward achieving the classifications illustrated in the SEIR on both the Alpine "mid density" map and the Alpine "Land Use alternative Map". Our property was recommended for the classifications of VR-2 with a small area set aside for Rural Commercial in the Alpine Community Planning Group Plan, the Staff recommended plan, and the San Diego County Planning Commission Plan.
Our inclusion within the village of Alpine, our immediate proximity to the site of the future Alpine High School, as well as being inside the current Water Service Area makes this property very appropriate for higher density development.
We look forward to a hearing in the near future that will bring this matter to a pleasant conclusion. It has been a long four and a half years.
We support the classification of VR-2 over our residential land and Rural Commercial on 2.4 acres.

Thank you for your attention to our concerns.

Charles Kaderabek and Lynn Augustyn

1550 Via La Mancha San Alpine, CA 91901
Ph: 619-544-0339 Fax: 619-544-0567

Charles Kaderabek & Lynn Augustyn

DEPARTMENT OF PLANNING AND DEVELOPMENT SERVICES
5510 Overland Avenue Suite 300
San Diego, CA 92123

RE: SEIR as it pertains to Campbell Creek Ranch Property
Attn: Peter Eichar

Dear Mr. Eichar:
Our property is an immediate neighbor to the property located at 3535 Alpine Blvd. and known as the Campbell Creek Ranch; in fact, we surround it on (3) sides. We recognize that like our own property, the Campbell Ranch is within the Village Core, and must be expected to take its' share of the growth of our community. Much like our own property, Campbell's holding is within the water service area and can, at some point, be expected to have sewer available.
Therefore, we support the recommended designation of VR-2 as described in both the Alpine Mid Density Map and the Alpine Land Use Alternative map. This property, like our own, received the full support of the Alpine Planning Group and the SD County Planning Commission.
We look forward to the final resolution of this matter in the near future.

Sincerely,
Charles Kaderabek and Lynn Augustyn

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GR-1 Project Objectives

The FCI Lands GPA Draft SEIR listed Project objectives in Section 1.3, Project Objectives. There are 12 objectives, the first ten of which are from the 2011 General Plan PEIR and two were developed specifically for this project.

CEQA Guideline 15124 (b) provides direction to Lead agencies in crafting projects objectives. It reads:

> (b) A statement of the objectives sought by the proposed project. A clearly written statement of objectives will help the lead agency develop a reasonable range of alternatives to evaluate in the EIR and will aid the decision makers in preparing findings or a statement of overriding considerations, if necessary. The statement of objectives should include the underlying purpose of the project.

In accordance with the Guideline, the project objectives included the underlying purpose of the project, which, as stated in SEIR Section 1.3, are to:

- Assign land use designations in a manner consistent with the Guiding Principles, Goals, and Policies of the adopted County General Plan.
- Assign land use designations that minimize conflicts with the U.S. Forest Service (USFS) Cleveland National Forest Management Plan.

Certain comment letters received during public review of the Draft SEIR contend that the proposed Project conflicts with the objectives set forth within the SEIR. Where this contention is set forth, the County has responded as to why specifically the Project would meet each Project objective. Overall, the proposed Project meets each project objective and specifically meets the two project objectives detailed above, which include the underlying purpose of the project. The proposed Project would assign land use designations consistent with the County General Plan within FCI lands and also would minimize conflicts with the USFS Cleveland National Forest Management Plan.

Some comment letters state that the project does not meet an objective, which in turn would cause impacts. Consistent with Guideline 15124 (b) above, the objectives were used to develop the Project alternatives, not for making determinations on the significance of impacts. The Project objectives were also used to inform the determination of the various land use designations that are represented by the proposed Project and project alternatives. Consistency or inconsistency with project objectives determines, in part, what constitutes a feasible or infeasible Project alternative. The project objectives will also aid the drafting of the necessary and appropriate findings required by CEQA Guideline 15091, Findings.

The determination of impact significance is performed with the use of significance criteria that is discussed at the beginning of each resource area of the Draft SEIR under the sub-heading of *Guidelines for the Determination of Significance.* None of the resource subjects analyzed in the Draft SEIR employ the project objectives as a means for determining the potential significance of impacts. How well or not the proposed Project or any of the feasible alternatives meet all or individual project objectives is a determination that will ultimately be made by the County Board of Supervisors.

All comments regarding the proposed Project or feasible alternatives regarding their consistency with the project objectives will be included in the Final SEIR and made available to the decision makers for their consideration. It is the Board of Supervisors discretion to determine project consistency with project objectives, significance of impacts and whether or how to determine the final land use designations for the FCI Lands GPA Project.

GR-2 Project Baseline

Some comments received contend that the Draft SEIR did not utilize a proper existing conditions baseline. The "baseline" is generally what represents "on-the-ground" conditions, or environmental setting, for each issue analyzed in the EIR. By establishing the baseline condition, impacts of the proposed Project then can be analyzed as to how it would physically impact the existing environment, or baseline condition.

As described in Section 1.1 of Chapter 1 of the Draft SEIR, the FCI expired on December 31, 2010. With its expiration, the former FCI lands reverted to the land use designations of the previous General Plan (1978) in effect before the FCI was enacted. Further explained within the description of the No Project alternative in Chapter 4 of the SEIR, the current land use designations on the FCI lands allow for higher densities than the proposed Project or any of the other alternatives, and higher than the densities that were in effect during the life of the FCI. The land use designations currently associated with the FCI lands are not consistent with the 2011 General Plan land use designations or the General Plan Goals and Policies and Guiding Principles.

The analysis in the Draft SEIR did not use either the current land use designations or the designations of the FCI as the baseline. Rather, the Draft SEIR analyzed the impacts of the proposed Project in comparison to existing physical conditions (i.e., what is on the ground today). The County is of the opinion that the correct baseline was used and that impacts were analyzed accordingly. As an example, Table 2.4-1 in SEIR Section 2.04 identifies the acres of vegetation that would be impacted based on existing physical conditions on the ground today. Consistent with CEQA Guideline 15125 and discussed in section 1.5.1 Environmental Setting of the SEIR "The baseline conditions for the proposed Project are the same as those discussed in the General Plan Update PEIR and are incorporated here by reference. Refer to page 1-59 of Chapter 1 of the General Plan Update PEIR, Table 1-13 Environmental Baselines used in the General Plan Update PEIR."

As explained in SEIR Section 4.5.1, the proposed Project is assigning land use designations that will decrease densities overall when compared to the existing land use designations, i.e. the No Project alternative.

County staff evaluated all Notice of Preparation (NOP) comments and attended community group meetings to gather input on the Project. In addition, hearings were held with both the Planning Commission and Board of Supervisors. Through this process, the map endorsed by the Board of Supervisors in June 2014 became the proposed Project and a reasonable range of reduced development intensity alternatives was prepared for comparison in Chapter 4 of the Draft SEIR.

GR-3 Global Climate Change

The County developed a *Recommended Approach to Addressing Climate Change in CEQA Documents (Recommended Approach)* to be used during the County's review process for discretionary projects and environmental documents pursuant to CEQA (County of San Diego 2015). The guidance recommends using a 900 metric tons carbon dioxide equivalent per year (MT CO_2e/year) screening level to determine the need for additional analysis of greenhouse gas (GHG) emissions from a project. Projects that exceed the screening level are required to demonstrate a 16 percent reduction from the "unmitigated" scenario for 2020. The 16 percent reduction requirement is equivalent to California's AB 32 goal of reducing 2020 emissions to 1990 levels. This is because emissions from the 2020 "business as usual" scenario (i.e., where no action to reduce GHG emissions is taken) would need to be reduced by 15.75 percent to reach 1990 levels, according to analysis provided by the California Air Resources Board (CARB) (CARB 2011).[1]

Since distribution and use of the County's *Recommended Approach*, the California Supreme Court rendered its decision in the *Center for Biological Diversity v. California Department of Fish and Wildlife and Newhall Land and Farming (*2015) 224 Cal.App.4th 1105 *(CBD vs. CDFW,* also known as the "Newhall Ranch" case). The justices evaluated for compliance with CEQA one of the most common approaches to GHG analyses for development projects (i.e., evaluating a project's emissions in the context of the AB 32's 2020 reduction goal), using a comparison to an unregulated, "business as usual (BAU)" emissions scenario.

The impact analysis in the Newhall Ranch EIR formulated a BAU scenario and the EIR determined the project's GHG impact to be less than significant. The Court overturned the Newhall Ranch EIR's use of this BAU approach, because it lacked a "reasoned explanation based on

[1] It should be noted that CARB made slight revisions to the 1990 and 2020 GHG inventories in the latest update to the Scoping Plan (May 2014). The revisions were based on updated global warming potentials. However, the resulting inventories differed by less than one percent from what was reported in the Functional Equivalent Document referenced here.

substantial evidence" about the linkage between the individual project's emissions and the statewide Scoping Plan reduction goals. The Court also hinted at the need "in the near future" to consider post-2020 GHG reduction targets for projects with longer buildouts.

The County has revised its *Recommended Approach to Addressing Climate Change in CEQA Documents* to be used during the County's review process for discretionary projects and environmental documents pursuant to CEQA (County of San Diego 2016). The revised guidance recommends the use of GHG efficiency metrics to assess the GHG efficiency of a project on a "service population (SP)" basis (the sum of the number of jobs and the number of residents provided by a project). These metrics represent the rate of emissions needed to achieve a fair share of the State's emissions mandate embodied in AB 32. The use of "fair share" in this instance indicates the GHG efficiency level that, if applied statewide, would meet the AB 32 emissions target and support efforts to reduce emissions beyond 2020. County staff has developed GHG efficiency metrics for the project based on emissions rates for the land use-driven emission sectors in CARB's GHG inventory.

The land-use sector driven inventory for 1990 was divided by the population and employment projections for California in 2020. The efficiency metric allows the threshold to be applied evenly to all project types (residential, commercial/retail and mixed use) and uses an emissions inventory comprised only of emission sources from land-use related sectors. The efficiency approach allows lead agencies to assess whether any given project or plan would accommodate population and employment growth in a way that is consistent with the emissions limit established under AB 32. The resultant GHG efficiency metric for the targeted emissions level for 2020 is 4.9 MT CO_2e/SP/year.

2020 Efficiency Metric

The GHG efficiency metric is 4.9 MT CO_2e/SP/year for 2020.

California Service Population in 2020	
2020 Population Projection* =	40,619,346
2020 Employment Projection** =	18,511,200
2020 Service Population =	59,130,546 SP
CARB's 1990 California GHG Inventory = 2020 Emissions Target	
1990 Total Emissions =	431.0 MMT CO_2e
1990 Non-land Use Emissions =	144.3 MMT CO_2e
1990 Land Use Emissions =	286.7 MMT CO_2e

1990 Land Use Emissions/2020 SP, or 286.7 MMT/59,130,546 SP = 4.9 MT/SP
where MMT = million metric tons

Sources:

*California Department of Finance, Demographic Research Unit
Report P-2, State and County Population Projections by Race/Ethnicity and Age (5-year groups)
2010 through 2060 (as of July 1); December 15, 2014
**California Department of Finance, Employment Development Department
Industry Employment Projections, Labor Market Information Division, 2010-2020; May 23, 2012

Operation of projects resulting from the FCI Lands GPA would continue well after 2020; Project buildout is assumed to occur by 2050. For this reason, this analysis includes an evaluation of potential GHG impacts in the timeframe beyond 2020, a period for which there is currently no State-adopted GHG emissions reduction target. CARB has indicated that an average statewide GHG reduction of 5.2-percent per year would be necessary to achieve the 2030 and 2050 targets embodied in Executive Orders B-30-15 and S-3-05, respectively (CARB 2015). Therefore, a GHG efficiency goal in terms of metric tons per service population, similar to the one developed for 2020, was estimated for 2030 and 2050 to allow evaluation of the project's GHG emissions in the post-2020 landscape. The equivalent goals for 2030 and 2050 compute to 2.7 and 0.8 MT CO_2e/SP/year, respectively. These targets were estimated by applying a uniform reduction from CARB's 1990 emissions inventory and dividing the resultant value by the projected statewide population and employment in 2030 and 2050. While a statewide GHG reduction plan for post-2020 targets to achieve either of the Executive Orders (S-03-05, B-30-15) has not been adopted; the County bases its significance determination for this proposed project on the interim 2030 target and projected buildout at 2050 to align with State goals.

If the project's estimated GHG emissions per service population in 2020 are less than the efficiency metric, the impact would be considered less than significant for the AB 32 target year. If the project's estimated GHG emissions per service population in 2030 or 2050 are less than the corresponding efficiency metric, then the proposed Project would be consistent with reduction trajectory the State needs to maintain to achieve its 2030 and 2050 goals (5.2 percent reduction per year) (CARB 2015). Therefore, if the project's emissions are determined to be on this trajectory based on compliance with the 2030 and 2050 GHG emissions per service population goal, it would not be anticipated to interfere with the State's long-term GHG reduction goals.

Consistent with the results of the evaluation of potential impacts related to global climate change that were disclosed in the Draft SEIR circulated for public review January 14 through February 29, 2016, the FCI Lands GPA will result in cumulatively considerable emissions in the horizon years of 2020, 2030 and 2050, thus resulting in cumulatively significant impacts. See Table GR-1.1 for the determination of Project Service Populations. Table GR-1.2 displays the results of the efficiency metric analysis. Total proposed Project mitigated emissions are taken from Tables 2.15-2 and 2.15-3 of the FCI Lands GPA SEIR, pages 2.15-14 and 2.15-15.

TABLE GR-1.1 – FCI SERVICE POPULATION

	Baseline	Horizon Years		
	2013	**2020**	**2030**	**2050**
Housing Units	172,124	194,536	208,698	237,021
Increase over 2013		22,412	36,574	64,897
Proportion of FCI units in 2050				10%
Cumulative Housing Units Built		2,157	3,519	6,245
Persons per household*		2.82	2.82	2.82
Resident Population		**6,082**	**9,925**	**17,611**
Commercial Acres	6,976	10,699	16,017	26,653
Increase over 2013		3,723	9,041	19,677
Proportion of FCI units in 2050				1%
Cumulative Comm. Acres Constructed		49	120	261
Employment Density**		5.70	6.10	6.40
Employee Population		**281**	**732**	**1,670**
Service Population		**6,363**	**10,656**	**19,281**

Notes:
* 2011 GPU PEIR
** Series 13 Regional Growth Forecast, SANDAG, 10/2013; employees per commercial acre

Global Response 4 (GR-4) Land Use Map Planning Criteria

Numerous comments (L-25 through L-33) reference Planning Criteria b) through f) which are from the "Department Reasons for Recommendation" from the staff report to the Board of Supervisors when they considered this Project on June 25, 2014 and endorsed land use designations. [This staff report is available on the Project web site at: http://www.sandiegocounty.gov/content/dam/sdc/dplu/advance/docs/FCI/bos/staffreport.pdf]

The Planning Criteria were used to assist County Staff with the development of the proposed Project and the Project alternative land use designations. All of these criteria included the qualifying term "typically," to account for the general applicability of these criteria; this qualification is not included in the paraphrased planning criteria comments.

The planning criteria are not discussed in the SEIR nor are they used to determine the significance of potential impacts; therefore the opinions expressed in the comments do not raise an issue with information provided or the impact determinations made in the Draft SEIR.

Global Response 5 (GR-5) Infrastructure Installation on USFS Lands

The ability to permit infrastructure installation or vegetation management activities on CNF Lands managed by the U.S. Forest Service (USFS) is wholly within the discretion of the USFS and not the County of San Diego. The SEIR does not propose the installation of infrastructure or vegetation management on CNF as a means to facilitate development associated with the FCI lands nor provide mitigation for their development. Further, because national forest lands are not subject to local land use authority or are the Cleveland National Forest Lands a part of the FCI Project areas, the requested policy statement is not within the purview of the proposed FCI Lands GPA.

Global Response 6 (GR-6) CEQA Guidelines: Appendix F, Energy Conservation

The County does not agree with the comment. Appendix F to the CEQA Guidelines requires that "EIRs include a discussion of the potential energy impacts of proposed projects, with particular emphasis on avoiding or reducing inefficient, wasteful and unnecessary consumption of energy." As discussed in the first paragraph of Appendix F, Section II, "[in] many instances specific items may not apply…" It is not clear in the CEQA Guidelines that Appendix F is intended for programmatic EIR's since this requirement appears to be more appropriate for project level EIR's. Some examples of where these Guidelines do not necessarily apply include identifying sections in these Guidelines that require the CEQA documents to identify specific energy reductions, efficiencies and conservation in construction, operation and maintenance activities. The FCI Lands GPA is a good example because this Project assigns land use designations only, and does not include any specific information that would be associated with actual development projects. Therefore, the FCI Lands GPA relies on a programmatic SEIR (PSEIR) where separate environmental review could be necessary for the analysis of specific development projects that follow the adoption of this GPA.

This FCI Lands GPA is proposing changes to existing General Plan designations that establish allowable land uses and intensities of development. The FCI Lands GPA cannot predict when and how any future development will occur, but can analyze the maximum potential development on a programmatic scale according to the intensities allowed by the land use designations assigned. Therefore, this PSEIR does not analyze building-specific impacts or efficiencies associated with construction, maintenance or operation activities because they are still unknown at this time. Rather, this PSEIR relies on General Plan policies, mitigation/implementation measures, ordinances, design guidelines and procedures to establish requirements for future development that must be met prior to receiving a building permit. Potential impacts associated with subsequent building-specific activities are addressed through state, regional and local laws, regulations, and mitigation programs applied at the project level (e.g., construction, operation and maintenance activities).

The applicable, required information related to Appendix F of the CEQA Guidelines was included within various sections of the SEIR, including but not limited to, the Project Description, Environmental Setting, and evaluations of potential impacts were included throughout Chapter 2. Based on this comment and for ease of reader information, the County has summarized the Energy Use Analysis into this Global Response to Comment (GR-6) of Final SEIR. GR-6 demonstrates how the requirements of CEQA Guidelines, Appendix F are met. It should be noted that this information provides additional clarification and information regarding energy usage. SEIR subsection 2.14.3.8, Energy, concluded that implementation of the proposed Project would result in potentially significant direct and cumulative impacts; however, those impacts would be reduced to below a level of significance through implementation programs (2011 General Plan goals/policies) and mitigation measures from the General Plan Update PEIR. Therefore, no additional measures would be required. That conclusion remains with the summarization of this information pertaining to energy conservation and usage.

Please note that the first two paragraphs of this Global Response are referenced when the contents suggested by Appendix F of the CEQA Guidelines are not applicable to this FCI Lands GPA PSEIR.

1. *Energy consuming equipment and processes which will be used during construction, operation and/or removal of the project. If appropriate, this discussion should consider the energy intensiveness of materials and equipment required for the project*.

   Response: This is not applicable. The FCI Lands GPA proposes changes to existing General Plan designations that establish allowable land uses and intensities of development and cannot predict energy intensiveness of materials and equipment required by unknown subsequent development projects, because it is not known at this time when or if development of parcels would occur. This PSEIR analyzes the maximum potential development on a programmatic scale according to the intensities allowed by the land use designations assigned (refer to the first two paragraphs at the beginning of this Response to Comment).

   This PSEIR does include policies that would be applied to subsequent projects implemented under the overall project. The applicable policies and mitigation measures concerning construction and operation of subsequent development projects are detailed below.

   - Subsection 2.14.4.6 includes Policy COS-17.2 requires recycling, reduction and reuse of construction and demolition debris.
   - Subsection 2.15.4.1 includes Policy COS-10.7 that concerns the construction and demolition debris recycling facilities and mitigation measures CC-1.1 to update the Count Green Building Program; CC-1.16 that requires development of a strategic energy plan that includes a component to monitor/reduce energy demand in County facilities; CC-1.17 to develop and implement a County operations recycling program; CC-1.18 to develop a County operations water conservation program and CC-1.19 to require the County to make revisions to the Zoning Ordinance to facilitate recycling salvaged concrete, asphalt, and rock.

2. *Total energy requirements of the project by fuel type and end use.*

   Response: Total electrical and natural gas energy requirements are provided in SEIR Appendix F (GHG Calculations), segregated according to residential, commercial and industrial uses. The table on F-23 in Appendix F, which is repeated below, provides forecasts for buildout of the Project years 2020, 2030 and 2050.

ACTIVITY DATA			Existing	Proposed Project		
SECTOR	SUBSECTOR	UNITS/YEAR	2013	2020	2030	2050
ENERGY						
	RESIDENTIAL ELECTRICITY	KWH	1,362,545,339	1,539,960,261	1,652,065,167	1,876,274,977
	RESIDENTIAL DIRECT ACCESS ELECTRICITY	KWH	6,722,204	7,597,492	8,150,569	9,256,722
	RESIDENTIAL NATURAL GAS	THERMS	37,097,579	41,927,997	44,980,241	51,084,728
	RESIDENTIAL DIRECT ACCESS NATURAL GAS	THERMS	8,201	9,269	9,944	11,294
	RESIDENTIAL SUBTOTAL					
	COMMERCIAL ELECTRICITY	KWH	927,871,044	1,423,010,270	2,130,352,021	3,545,035,523
	COMMERCIAL DIRECT ACCESS ELECTRICITY	KWH	112,201,898	172,076,125	257,610,734	428,679,952
	COMMERCIAL NATURAL GAS	THERMS	20,132,967	30,876,510	46,224,427	76,920,262
	COMMERCIAL DIRECT ACCESS NATURAL GAS	THERMS	3,169,615	4,861,014	7,277,299	12,109,869
	COMMERCIAL SUBTOTAL					
	INDUSTRIAL ELECTRICITY	KWH	279,712,413	420,646,346	621,980,536	1,024,648,916
	INDUSTRIAL DIRECT ACCESS ELECTRICITY	KWH	128,244,582	192,860,997	285,170,161	469,788,489
	INDUSTRIAL NATURAL GAS	THERMS	4,714,542	7,089,978	10,483,458	17,270,418
	INDUSTRIAL DIRECT ACCESS NATURAL GAS	THERMS	32,996,868	49,622,439	73,373,254	120,874,884
	INDUSTRIAL SUBTOTAL					

In addition, the table on page F-29 of SEIR Appendix F (repeated below) includes total electrical requirements for electric vehicles based an average of 29 kilowatt-hours per 100 vehicle miles traveled.

Transportation Emissions - Proposed Project

2020				County-Specific Weighted Average			
Category	% VMT (from EMFAC 2014)	VMT	Average kwh/100 miles	Emission Factors (g CO2/mi)	Emission Factors (g CH4/mi)	Emission Factors (g N2O/mi)	Emissions (MT CO2e)
Diesel	6%	3,486,019		1316.70	1.15E-01	3.90E-02	4,639.477
Electric	1.7%	969,036	29	0.84	3.37E-05	7.14E-06	0.820
Gasoline	92%	51,989,905		410.01	1.47E-02	6.04E-03	21,427.206
Totals		**56,444,960**					**26,068**

2030				County-Specific Weighted Average			
Category	% VMT (from EMFAC 2014)	VMT	Average kwh/100 miles	Emission Factors (g CO2/mi)	Emission Factors (g CH4/mi)	Emission Factors (g N2O/mi)	Emissions (MT CO2e)
Diesel	7%	16,559,288		1099.64	8.40E-02	3.62E-02	18,418.577
Electric	8.9%	22,063,614	29	0.71	3.37E-05	7.14E-06	15.707
Gasoline	84%	209,977,293		236.82	8.81E-03	2.74E-03	49,938.737
Totals		**248,600,196**					**68,373**

2050				County-Specific Weighted Average			
Category	% VMT (from EMFAC 2014)	VMT	Average kwh/100 miles	Emission Factors (g CO2/mi)	Emission Factors (g CH4/mi)	Emission Factors (g N2O/mi)	Emissions (MT CO2e)
Diesel	7%	33,761,647		1116.20	7.57E-02	3.67E-02	38,110.480
Electric	9.5%	44,575,151	29	0.71	3.37E-05	7.14E-06	31.733
Gasoline	83%	390,044,312		221.17	8.14E-03	2.34E-03	86,609.621
Totals		**468,381,110**					**124,752**

Notes:

VMT = vehicle miles traveled; see Table 3 of Appendix

kWh = kilowatt-hours

3. Energy conservation equipment and design features.

Response: As previously detailed, the FCI Lands GPA proposes changes to existing General Plan designations that establish allowable land uses and intensities of development and cannot predict the actual equipment and design features of future development projects because it is not known at this time when or if development of parcels would occur. This PSEIR analyzes the maximum potential development on a programmatic scale according to the intensities allowed by the land use designations assigned (refer to the first two paragraphs at the beginning of this Global Response to Comment).

However, identified below, along with the section where they are referenced in the SEIR, are the applicable policies and mitigation measures concerning energy conservation requirements for development projects.

- Subsection 2.14.4.8 includes Policy COS-14.7 encourages development projects to use alternative energy sources; Policies COS-15.1 through COS-15.5 require new and existing buildings to maximize energy efficiency. The related mitigation measures identified in this section include USS-8.1, which reduces the need for new or expanded energy facilities in new development and USS-8.2 and USS-8.3, which reduce energy usage for government operations.
- Subsection 2.15.4.1 includes Policy COS-17.5, which promotes methane recapture in landfills to generate additional energy and Policy COS-18.2, which encourages methane sequestration and other sustainable strategies to produce energy from waste disposal or management sites. This section also includes mitigation measure USS-1.17 to develop and implement a County Operations Recycling Program that includes measures to recover by-product methane to generate electricity.

4. Identification of energy supplies that would serve the project.

Response: GPU FEIR subsection 2.16.1.4 describes the current power and energy resources serving the unincorporated County, which include electricity, natural gas, nuclear energy, and alternative energy sources such as biomass/bio-gas energy, hydroelectric power, solar cells and wind energy. This section further discusses that because energy supply and demand does not differentiate between jurisdictional boundaries, it is difficult to discuss energy in terms of the Project area alone. Therefore, generally the data presented in the GPU FEIR represents current energy conditions for the entire San Diego County region.

FCI Lands GPA SEIR subsection 2.14.1 provides updated existing conditions information that has evolved since adoption of the 2011 General Plan for utilities and service systems within the unincorporated County as relates to the Project areas. In addition, FCI Lands GPA SEIR Project Description, Table 1-6, identifies regional energy and utility projects.

5. *Total estimated daily vehicle trips to be generated by the project and the additional energy consumed per trip by mode.*

Response: SEIR Appendix D, Table D-2, identifies the estimated vehicular trips generated by the FCI Lands GPA for each community within the Project area, in average daily vehicle trips (ADTs). SEIR Appendix D (Attachment A), Traffic Impact Assessment, subsection 4.0 concludes that of the five communities where deficient roadway segments are forecast (Alpine, Desert, Jamul, Mountain Empire and Ramona), the community of Alpine will likely be most affected by the Project.

Table 4 (page F-4) of the SEIR Appendix F, GHG Calculations compares the buildout (year 2050) vehicle miles traveled (VMT) for the proposed Project, existing General Plan (No Project alternative) and the 2011 General Plan. This information is repeated below.

Table 4 – Estimated Build-out VMT in FCI-land and Unincorporated Area for Proposed Project

	Build-Out Daily VMT (2050)	Build-Out Annual VMT (2050)
Build Out VMT in FCI-Lands		
SEIR Proposed Project	1,283,236	468,381,110
Existing GP - No Project	1,418,578	517,781,064
Recommended Project 2011	615,327	224,594,364
Build Out VMT in non-FCI- Lands[a]		
Cumulative Projects	1,423.65	519,631
Build Out VMT in Entire Unincorporated Area		
Recommended Project 2011	24,544,826	8,958,861,490
With SEIR Proposed Project	25,212,735	9,202,648,236
With No Project	25,348,077	9,252,048,190
With No Project + Cumulative Projects	25,867,708	9,441,713,547
Source: Data compiled by Ascent Environmental, Inc. in 2015 [a] Included for informational purposes only.		

In addition, the SEIR Appendix F tables on pages F-26 and F-29 identify the breakdown of VMT by type of fuel: diesel (6%), electric (1.7%) and gasoline (92%). These tables are repeated below.

2020 Transportation-related Emissions (Unmitigated and Mitigated)

Calendar Year 2020 County-Specific Weighted Average

Category	% VMT (from EMFAC 2014)	VMT	Average kw-hrs/100 miles	Emission Factors (g CO2/mi)	Emission Factors (g CH4/mi)	Emission Factors (g N2O/mi)	Emissions (MT CO2)	Emissions (MT CH4)	Emissions (MT N2O)	Total Emissions (MT CO2e)
Diesel	6%	3,486,025		1185.03	0.12	0.04	4,131.030	0.401	0.136	4,180
Electric	1.7%	969,037	29.00	0.84	0.00	0.00	0.818	0.000	0.000	1
Gasoline	92%	51,989,997		364.78	0.01	0.01	18,965.015	0.764	0.314	19,076
Totals		56,445,060								23,257

Calendar Year 2020 County-Specific Weighted Average

Category	% VMT (from EMFAC 2014)	VMT	Average kw-hrs/100 miles	Emission Factors (g CO2/mi)	Emission Factors (g CH4/mi)	Emission Factors (g N2O/mi)	Emissions (MT CO2)	Emissions (MT CH4)	Emissions (MT N2O)	Total Emissions (MT CO2e)
Diesel	6%	3,486,025		1316.70	0.13	0.04	4,590.033	0.446	0.136	4,641
Electric	1.7%	969,037	29.00	0.84	0.00	0.00	0.818	0.000	0.000	1
Gasoline	92%	51,989,997		410.01	0.01	0.01	21,316.677	0.764	0.314	21,427
Totals		56,445,060								26,069

LCFS Reduction	10%	36.48
Advanced Clean Cars Reduction	2.40%	8.75
		45.23

Conversion Factors

1	MT
1000000	g

Transportation Emissions - Proposed Project

2020 — County-Specific Weighted Average

Category	% VMT (from EMFAC 2014)	VMT	Average kwh/100 miles	Emission Factors (g CO2/mi)	Emission Factors (g CH4/mi)	Emission Factors (g N2O/mi)	Emissions (MT CO2e)
Diesel	6%	3,486,019		1316.70	1.15E-01	3.90E-02	4,639.477
Electric	1.7%	969,036	29	0.84	3.37E-05	7.14E-06	0.820
Gasoline	92%	51,989,905		410.01	1.47E-02	6.04E-03	21,427.206
Totals		56,444,960					26,068

2030 — County-Specific Weighted Average

Category	% VMT (from EMFAC 2014)	VMT	Average kwh/100 miles	Emission Factors (g CO2/mi)	Emission Factors (g CH4/mi)	Emission Factors (g N2O/mi)	Emissions (MT CO2e)
Diesel	7%	16,559,288		1099.64	8.40E-02	3.62E-02	18,418.577
Electric	8.9%	22,063,614	29	0.71	3.37E-05	7.14E-06	15.707
Gasoline	84%	209,977,293		236.82	8.81E-03	2.74E-03	49,938.737
Totals		248,600,196					68,373

2050 — County-Specific Weighted Average

Category	% VMT (from EMFAC 2014)	VMT	Average kwh/100 miles	Emission Factors (g CO2/mi)	Emission Factors (g CH4/mi)	Emission Factors (g N2O/mi)	Emissions (MT CO2e)
Diesel	7%	33,761,647		1116.20	7.57E-02	3.67E-02	38,110.480
Electric	9.5%	44,575,151	29	0.71	3.37E-05	7.14E-06	31.733
Gasoline	83%	390,044,312		221.17	8.14E-03	2.34E-03	86,609.621
Totals		468,381,110					124,752

B. Environmental Setting may include existing energy supplies and energy use patterns in the region and locality.

Response: The GPU FEIR, Project Description subsection 1.14.2.3 includes a discussion of Regional Energy and Utility Projects and Table 1-9 provides a list of regional energy projects. The FCI Lands GPA provides updated information in subsection 1.9.1.5 and Table 1-6.

C. Environmental Impacts:

The Guidelines under the environmental impacts category are more applicable to development projects where the actual construction, operation and maintenance activities can be analyzed. In most instances, this Project to change General Plan land use designation change, which does not include any development, is not applicable. However, information is provided below that shows the sections in the SEIR that address these impacts on a programmatic level.

1. The project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project including construction, operation, maintenance and/or removal. If appropriate, the energy intensiveness of materials maybe discussed.

Response: This analysis of energy requirements does not apply to the Project because the FCI Lands GPA proposes changes to existing General Plan designations that establish allowable land uses and intensities of development and cannot predict actual energy requirements for the construction, operation, and maintenance of future development projects. In addition, energy use efficiencies are not identified because they are unknown at the programmatic level of this SEIR. This PSEIR analyzes the maximum potential development on a programmatic scale according to the intensities allowed by the land use designations assigned (refer to the first two paragraphs at the beginning of this Global Response to Comment).

However, the energy forecast requirements, based on the potential buildout that the land use designation changes would allow, are provided in SEIR Appendix F, GHG Calculations, for the following sectors:

- Electric and natural gas – requirements segregated according to residential, commercial and industrial lands in kilowatt-hours and therms (see page F-23).

ENERGY FORECAST

Activity Data			Existing	Proposed Project		
SECTOR	SUBSECTOR	UNITS/YEAR	2013	2020	2030	2050
ENERGY						
	Residential Electricity	kWh	1,362,545,339	1,539,960,261	1,652,065,167	1,876,274,977
	Residential Direct Access Electricity	kWh	6,722,204	7,597,492	8,150,569	9,256,722
	Residential Natural Gas	Therms	37,097,579	41,927,997	44,980,241	51,084,728
	Residential Direct Access Natural Gas	Therms	8,201	9,269	9,944	11,294
	Commercial Electricity	kWh	927,871,044	1,423,010,270	2,130,352,021	3,545,035,523
	Commercial Direct Access Electricity	kWh	112,201,898	172,076,125	257,610,734	428,679,952
	Commercial Natural Gas	Therms	20,132,967	30,876,510	46,224,427	76,920,262
	Commercial Direct Access Natural Gas	Therms	3,169,615	4,861,014	7,277,299	12,109,869
	Industrial Electricity	kWh	279,712,413	420,646,346	621,980,536	1,024,648,916
	Industrial Direct Access Electricity	kWh	128,244,582	192,860,997	285,170,161	469,788,489
	Industrial Natural Gas	Therms	4,714,542	7,089,978	10,483,458	17,270,418
	Industrial Direct Access Natural Gas	Therms	32,996,868	49,622,439	73,373,254	120,874,884

EMISSIONS (MT CO_2e / YEAR)			Existing	Proposed Project		
SECTOR	SUBSECTOR		2013	2020	2030	2050
ENERGY						
	Residential Electricity		381,365	378,029	405,549	460,588
	Residential Direct Access Electricity		1,881	1,865	2,001	2,272
	Residential Natural Gas		250,334	282,930	303,527	344,720
	Residential Direct Access Natural Gas		55	63	67	76
	RESIDENTIAL SUBTOTAL		***633,636***	***662,887***	***711,143***	***807,656***
	Commercial Electricity		259,703	349,320	522,958	870,235
	Commercial Direct Access Electricity		31,404	42,241	63,238	105,232
	Commercial Natural Gas		135,857	208,355	311,922	519,058
	Commercial Direct Access Natural Gas		21,389	32,802	49,107	81,717
	COMMERCIAL SUBTOTAL		***448,353***	***632,718***	***947,226***	***1,576,242***
	Industrial Electricity		78,289	103,260	152,684	251,531
	Industrial Direct Access Electricity		35,895	47,343	70,004	115,324
	Industrial Natural Gas		31,814	47,843	70,742	116,541
	Industrial Direct Access Natural Gas		222,663	334,852	495,123	815,664
	INDUSTRIAL SUBTOTAL		***368,660***	***533,299***	***788,552***	***1,299,059***

- Electric use by vehicles – requirements by kilowatts-hours per 100 vehicle miles for years 2020, 2030 and 2050 (see page F-29). [See tables provided above for CEQA criteria #5, Total estimated daily vehicle trips to be generated by the project).

- Potable water – requirements based on million gallons per year for years 2020, 2030 and 2050 (see page F-30).

Potable Water

	Million gallons/year	kWh/MG	MWh/year	MTCO2e/yr	Increase MTCO2e	MTCO2e Proposed Project
2013	24,400	12,700	309,880	90,501		
2013 33% RPS	24,400	12,700	309,880	75,795		
2020	27,577	12,700	350,226	102,284	11,783	1,134
2030	29,319	12,700	372,348	91,074	15,279	1,470
2050	32,803	12,700	416,593	101,896	26,101	2,512

2. The effects of the project on local and regional energy supplies and on requirements for additional capacity.

Response: SEIR subsection 2.14.3.8 determined that development of land uses as designated by the proposed Project would require energy for construction and operation, thereby increasing energy demand in the county. The subsection further determined that the increase in energy demand would affect energy facilities located within the unincorporated county as well as energy facilities that serve unincorporated areas but are located outside the county. This subsection further determined that to accommodate this projected increase in energy demand, energy facilities would need to be constructed or expanded. In addition, regional energy projects that will be constructed within the region to meet future energy demands have been identified in the General Plan Update PEIR and also in the Project Description, subsection 1.9.1.5 (Regional Energy and Utility Projects) of this FCI Lands GPA SEIR. These projects include new energy production facilities, transmission facilities, or expansion of existing facilities.

In addition, SEIR Appendix F includes calculations of the increased energy consumption based on buildout of the Project by identifying the increase in the number housing units (see Table 8 on page F-7) and the changes in acres of commercial and industrial land uses (see Attachment A to SEIR Appendix F on pages F-15 through F-19).

Table 7 – Housing Units and Population Data

	GP Build-Out	
Scenario	Housing Units	Population
Unincorporated Area in 2005	162,381	460,247
Recommended Project (RP) 2011 between 2005 and build-out	72,683	202,761
Difference between RP2011 and FCI No Project	10,806	30,479
Difference between RP2011 and SEIR Proposed Project	1,957	5,520
Difference between Existing GP and other Cumulative Projects (Excluding FCI Updates)	6,213	17,524
GP Update - No Project	245,870	693,487
GP Update with Proposed Project	237,021	668,528
GP Update with No Project + Cumulative Projects	252,083	711,011

3. The effects of the project on peak and base period demands for electricity and other forms of energy.
Response: In SEIR Appendix F, GHG Calculations, the total base electrical and natural gas energy requirements are shown in the tables on pages F-23 through F-32 and are broken down according to components such as residential, commercial and industrial land uses, electric vehicles and water and wastewater systems. However, SEIR subsection 2.14.3.8 determined that direct and cumulative impacts would occur with future development of the Project areas because development of land uses as designated by the proposed Project would require energy for construction and operation, thereby increasing energy demand in the county.

This subsection further determined that "to accommodate the projected increase in energy demand, energy facilities would need to be constructed or expanded, which would have the potential to cause significant environmental effects." However this guideline to identify the effects on peak demands is not applicable because more specific information on actual development projects is necessary to determine peak demands. This PSEIR analyzes the maximum potential development on a programmatic scale according to the intensities allowed by the land use designations assigned. This information would be analyzed in the environmental analyze of future development projects, which are generally unknown at this time and are not part of this GPA (refer to the first two paragraphs at the beginning of this Response to Comment).

4. The degree to which the project complies with existing energy standards.
Response: An analysis of actual development projects, which are not part of this GPA, is necessary to determine compliance with energy standards. At a programmatic level, the SEIR identifies General Plan policies and mitigation measures that

establish requirements for these projects; however, cannot measure how well the development projects actually comply with existing energy standards.

These policies and the mitigation measure encourage alternative energy sources, energy efficiency, green building programs and energy recovery for development. Adherence to these policies will reduce impacts associated with new or expanded energy facilities. The applicable policies and mitigation measures that establish requirements for projects to comply with existing energy standards are identified below, along with the subsection where they are referenced in the FCI Lands GPA SEIR.

- Subsection 2.14.4.8 includes policies that require adherence with existing standards, such as: COS-15.1 Design and Construction of New Buildings; COS-15.3 Green Building Programs; COS-15.4 Title 24 Energy Standards; COS-15.5 Energy Efficiency Audits. Also included is mitigation measure USS-8.1 to implement the County Green Building Program.
- Subsection 2.15.4.1 identifies Policy COS-17.1 that requires reduction, reuse or recycling of solid waste to divert solid waste from landfills in compliance with State law.

5. The effects of the project on energy resources.
Response: At a programmatic level, implementation of the policies and mitigation measures identified in paragraph 4 above would reduce the need for new or expanded energy facilities. SEIR subsection 2.14.3.8 describes potential direct and cumulative impacts on energy supplies and facilities as pertains to the Project areas.

6. The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.
Response: The total base transportation-related energy requirements are shown in Appendix F Table 1 on page F-1, and are repeated below. However, SEIR subsection 2.14.3.8 determined that direct and cumulative impacts would occur with future development of the Project areas because development of land uses as designated by the proposed Project would require energy for construction and operation, thereby increasing energy demand in the county. This information, which is also provided below for clarification, goes beyond what is required for the programmatic analysis provided in this SEIR.

Table 1 Transportation Assumptions and Emission Factors					
Fuel Type	Percent VMT (EMFAC 2014)	Average kWh/100 miles	Emission Factors (g CO_2/mi)	Emission Factors (g CH_4/mi)	Emission Factors (g N_2O/mi)
2013					
Diesel	6%		1271.54	1.80E-01	4.18E-02
Electric	0.2%	29	0.81	3.75E-05	7.93E-06
Gasoline	94%		442.09	2.70E-02	1.29E-02
2020					
Diesel	6%		1185.03	1.15E-01	3.90E-02
Electric	1.7%	29	0.71	3.37E-05	7.14E-06
Gasoline	92%		364.78	1.47E-02	6.04E-03
2030					
Diesel	7%		1099.64	8.40E-02	3.62E-02
Electric	8.9%	29	0.71	3.37E-05	7.14E-06
Gasoline	84%		236.82	8.81E-03	2.74E-03
2050					
Diesel	7%		1116.20	7.57E-02	3.67E-02
Electric	9.5%	29	0.71	3.37E-05	7.14E-06
Gasoline	83%		221.17	8.14E-03	2.34E-03

Notes: CH_4 = methane; CO_2 = carbon dioxide; kWh = kilowatt-hours; N_2O = nitrous oxide; VMT = vehicle miles traveled

Source: Data compiled by Ascent Environmental, Inc. in 2015

It should be noted that due to the location of the Project area, "efficient transportation alternatives," such as public transit, would generally not be feasible to implement. The majority of the FCI lands are located within remote areas of the County where development is not anticipated to be "concentrated," which is reflected in the majority of the land use designations. Due to the nature of where the majority of the FCI lands are located and the land use designations that are primarily 1 DU per 80 acres, the provision of public transit in these areas would not be desirable.

Transportation requirements for this Project have been determined based on the potential buildout that would be allowed by the land use designations proposed by this Project. SEIR Appendix F, GHG Calculations, Table 3 on page F-14 identifies the total transportation requirements in vehicle miles travelled (VMT) according to each land use designation. The Transportation section (pages F-1 through F-3) of SEIR Appendix F estimates annual transportation emissions (vehicle emission factors multiplied by annual VMT in the unincorporated county). These calculations consider energy efficiencies such as:

- Future impact of regulations and policies such as the Advanced Clean Cars program and the Low Carbon Fuel Standard, and
- Electric vehicle mode share, in addition to diesel and gasoline vehicles.

D. Mitigation Measures may include:

1. Potential measures to reduce wasteful, inefficient and unnecessary consumption of energy during construction, operation, maintenance and/or removal. The discussion should explain why certain measures were incorporated in the project and why other measures were dismissed.

Response: Identified below are the applicable policies and mitigation measures and the subsection where they are referenced in the FCI Lands GPA SEIR. There is not a discussion of measures that were dismissed because this list is all inclusive to address the wide range of potential development projects, which as unknown at this time.

- Subsection 2.3.4.2 identifies Policies COS-14.10; COS-15.1; COS-15.3 through COS-15.5; COS-14.2 and COS-14.9 that encourage mixed uses and alternative transportation to reduce energy demand and apply renewable energy and energy-efficiency practices to future development and to County facilities. This subsection also identifies mitigation measures Air-2.1 through Air-2.5 that would encourage use of low-emission vehicles, ensure on-going County municipal operations result in minimal carbon emissions associated with vehicle usage, provide incentives to promote the siting or use of clean air technologies or prevent release of construction-related pollutants. Also, Air-2.12 promotes LEED Silver standards or other equivalent Green Building rating systems into County facilities.
- Subsection 2.14.4.1 identifies Policy LU-9.4 that prioritizes infrastructure improvements and the provision of public facilities in community cores; Policy LU-12.1 that requires concurrency of infrastructure and services with development; Policy LU-14.1 that requires maintenance of adequate services with development and Policies LU-14.2 through LU-14.4 that require adequate wastewater facility plans, disposal, treatment facilities and sewer facilities. Adherence to these policies will reduce impacts associated with exceedance of San Diego Regional Water Quality Control Board (RWQCB) wastewater treatment requirements. This subsection also identifies mitigation measure USS-1.1 to help ensure that wastewater treatment needs are identified and planned to be proportionate to the provision of adequate facilities; USS-1.2 to help ensure that demand for wastewater treatment does not exceed capacity and USS-1.3 to ensure that the County is meeting RWQCB requirements and that infrastructure is being planned concurrent with development.

2. The potential of siting, orientation, and design to minimize energy consumption, including transportation energy, increase water conservation and reduce solid waste.

Response: Identified below are the applicable policies and mitigation measures and the subsection where they are referenced in FCI Lands GPA SEIR.

- Subsection 2.14.4.1 identifies Policies LU-12.1, LU-12.2 and LU-14.1 through LU-14.4, which require concurrency of infrastructure and services with development, the maintenance of adequate services with development and adequate wastewater facility plans, disposal, treatment facilities, and sewer facilities to reduce impacts associated with exceedance of RWQCB wastewater treatment requirements. Mitigation measure USS-1.3 ensures the County is meeting RWQCB requirements and that infrastructure is being planned concurrent with development.
- Subsection 2.14.4.3 identifies Policy LU-6.5 that ensures development minimizes the use of impervious surfaces and mitigation measures USS 3.1 that encourages conservation oriented design to minimize the need for new stormwater drainage facilities. Implementation of mitigation measure USS-3.2 would minimize the need for new or expanded stormwater facilities and USS-3.3 would provide measures for reducing stormwater runoff.
- Subsection 2.14.4.4 identifies Policies COS-4.1 through COS-4.4 that apply water conservation measures and preserve the quality of local water supply. This subsection also identifies mitigation measures USS-4.2 through USS-4.5 and USS-4.7. Implementation of these measures would potentially reduce future demand on existing water supplies, prevent future discretionary projects in water district areas that require imported water supply in exceedance of existing availability, reduce future demand on water supply in the county, minimize drawdown of groundwater supply, allow for recharge of groundwater storage, reduce future demand of imported water and groundwater, identify and minimize adverse environmental effects on groundwater resources and reduce the potential for exceedance of water availability.
- Subsection 2.15.4.1 identifies Policies COS-15.1 through 15.3 that require new and existing buildings be designed and constructed in accordance with programs that maximize energy efficiency; Policy COS-17.1 that reduces future landfill capacity needs through reduction, reuse or recycling of all types of solid waste generated. This subsection also identifies mitigation measures, such as: CC-1.4 to improve traffic flow to reduce vehicle miles traveled on county roads; CC-1.5 to coordinate with the County Water Authority and other water agencies to achieve efficient water usage; CC-1.6 to divert solid waste from landfills in the region; CC-1.7 to ensure that future development incorporate design features and mitigation measures that minimize energy consumption; CC-1.8 to warrant future development is consistent with the future Climate Change Action Plan; CC-1.9 to retrofit existing buildings for energy efficiency and CC-1.10 to minimize

development footprints and maximize natural resource preservation. In addition, subsection 2.14.4.8 identifies Policy COS-15.4 that requires energy efficiency in new construction and Policy COS-15.5 that encourages energy conservation and efficiency in existing development.

3. The potential for reducing peak energy demand.
Response: As discussed in the response provided in the first two paragraphs above, this the FCI Lands GPA does not include specific development projects where peak energy demand could be identified. See also the Response to C. Environmental Impacts, Guideline #3 above, concerning why analysis of peak demand is not applicable for this PSEIR.

However, the FCI Lands GPA does identify General Plan policies and mitigation measures that either require or encourage development to reduce or conserve energy that will ultimately result in a reduction in peak demand. These policies and mitigation measures, which are identified primarily in the FCI Lands GPA SEIR subsections 2.14.4.1, 2.14.4.3 and 2.14.4.4, are discussed in detail in the Responses the Guideline D, Mitigation Measures, for paragraphs D.2 and D.3 above.

In addition, the SEIR Appendix F (page F-20) identifies the forecast demand of buildout of the proposed Project for each energy sector, including residential, commercial and industrial electricity.

4. Alternate fuels (particularly renewable ones) or energy systems.
Response: The emissions calculations in SEIR Appendix F, GHG Calculations, take into account the San Diego Gas & Electric Company's renewable portfolio.

In addition, identified below are the applicable policies and mitigation measures concerning alternative fuels and the subsections where they are referenced in the FCI Lands GPA SEIR.

- Subsection 2.3.4.1 identifies mitigation measure AIR-2.1, which requires incentives, such as preferred parking, to promote use of alternatively fueled vehicles.
- Subsection 2.3.4.2 identifies Policy COS-14.9 that requires projects that generate potentially significant levels of air pollutants to incorporate renewable energy. In addition, mitigation measure Air-2.4 requires incentives to promote clean air technologies through renewable energy sources.

- Subsection 2.14.4.8 identifies Policies COS-15.1 through COS-15-3, which require new buildings be designed and constructed to maximize use of sustainable resources and renewable energy sources. In addition, mitigation measure USS-8.1 requires implementation of the County Green Building Program to maximize the use of sustainable resources.
- Subsection 2.15.4.1 identifies mitigation measure CC-1.16 which requires implementation of a strategic energy plan with measures that utilize renewable energy systems and increase County fleet fuel efficiency through use of alternative fuels.

5. Energy conservation which could result from recycling efforts.

Response: Identified below are the applicable policies and mitigation measures concerning recycling efforts and the subsection where they are referenced in the FCI Lands GPA SEIR.

- Subsection 2.3.4.2 identifies Policy COS-15.1 that requires new buildings to incorporate the use of sustainable resources and recycled materials.
- Subsection 2.14.4.6 identifies Policies COS-17.1 through COS-17.8 that encourage recycling facilities and require landfill waste management and recycling to reduce impacts associated with insufficient landfill capacity from future development. This subsection also identifies mitigation measures USS-6.2, USS-6.3 and USS-6.8 to increase participation in recycling and reduce solid waste output to reduce demand on solid waste facilities through alternative disposal options.
- Subsection 2.15.4.1 identifies Policies COS-10.7 (recycling of debris) and COS-17.1 (recycling of solid waste materials) and mitigation measure CC-1.17 to develop a County operated recycling program and CC-1.19 to revise the County Zoning Ordinance to facilitate recycling salvage construction waste materials.

E. Alternatives should be compared in terms of overall energy consumption and in terms of reducing wasteful, inefficient and unnecessary consumption of energy.

Response: The comparison of alternatives in terms of energy consumption is shown in the FCI Lands GPA SEIR Chapter 4 and Appendix F.

- SEIR Chapter 4 includes the tables that compare Project alternatives for buildout by lands uses in acres (Tables 4-2 and 4-3) and the number of dwelling units (Table 4-4) and average daily traffic (Table 4-12). These tables facilitate an overall comparison of energy consumption.

- SEIR Appendix F, GHG Calculations, compares the proposed Project, existing General Plan (No Project alternative) and 2011 General Plan based on buildout of the land use maps in the following:
    - Table 4 (page F-4) - vehicle miles traveled;
    - Table 8 (page F-7) – housing units and population data; and
    - Attachment A (pages F-15 through F-19) – buildout of commercial and industrial land uses).

A more specific comparison of overall energy consumption in terms of reducing wasteful, inefficient and unnecessary consumption of energy is not feasible because the FCI Lands GPA proposes changes to existing General Plan designations that establish allowable land uses and intensities of development and cannot predict when and how any future development will occur. This PSEIR analyzes the maximum potential development on a programmatic scale according to the intensities allowed by the land use designations assigned (refer to the first two paragraphs at the beginning of this Response to Comment).

F. Unavoidable Adverse Effects may include wasteful, inefficient and unnecessary consumption of energy during the project construction, operation, maintenance and/or removal that cannot be feasibly mitigated.
Response: This is not applicable as the FCI Lands GPA proposes changes to existing General Plan designations that establish allowable land uses and intensities of development and cannot predict when and how any future development will occur. This PSEIR analyzes the maximum potential development on a programmatic scale according to the intensities allowed by the land use designations assigned (refer to the first two paragraphs at the beginning of this Response to Comment).

However, SEIR subsection 2.14.3.8 determined that direct and cumulative impacts would occur with future development of the Project areas because development of land uses as designated by the proposed Project would require energy for construction and operation, thereby increasing energy demand in the County. This section further determined that "to accommodate the projected increase in energy demand, energy facilities would need to be constructed or expanded, which would have the potential to cause significant environmental effects."

G. Irreversible Commitment of Resources may include a discussion of how the project preempts future energy development or future energy conservation.
Response: As discussed in the Response provided in "F" above, SEIR subsection 2.14.3.8 determined that direct and cumulative impacts would occur with future development of the Project areas and that energy facilities would need to be constructed or expanded, which would have the potential to cause significant environmental effects.

H. Short-Term Gains versus Long-Term Impacts can be compared by calculating the project's energy costs over the project's lifetime.

Response: This criterion does not apply to the FCI Lands GPA because Short-Term Gains versus Long-Term impacts cannot be identified at this time. This Project is not a development project, rather this GPA proposes changes to existing General Plan designations that establish allowable land uses and intensities of development and cannot predict when and how any future development will occur (refer to the first two paragraphs at the beginning of this Response to Comment).

However, SEIR Appendix F, GHG Calculations, includes an energy forecast comparing existing (2013) demand with forecast demand of the proposed Project in 2020, 2030 and 2050 (see page F-23). In addition, growth in number of housing units, commercial and industrial acres are forecast for the proposed Project; comparing 2013 with 2020, 2030 and 2050 forecast (page F-24).

I. Growth Inducing Effects may include the estimated energy consumption of growth induced by the project.

Response: Growth inducing impacts of the FCI Lands GPA are analyzed in SEIR subsection 3.1. This subsection determines that "growth inducement has the potential to result in an adverse impact if the growth is not consistent with or accommodated by the land use plans and growth management plans and policies for the area affected." This subsection further determines that the proposed Project land use designations would allow for construction of new housing and other uses in the Alpine CPA at intensities that would require extension of water and sewer services. This subsection further determines that, based on CEQA Guidelines, these environmental effects of induced growth are considered indirect impacts and are considered significant, adverse environmental impacts.

Responses to Comment Letter A
Terry & David Howe
January 14, 2016

	Comment	Response to Comment
A-1	We are the owners of Windfall Ranch, encompassing 475 acres on Japatul Valley Road in the Alpine area. While our main endeavor on this property is to operate an equestrian boarding facility, it has been our dream to someday facilitate development of part of the property into home sites.	This comment describes the Windfall Ranch property and is an introduction to comments that follow. No further response is required.
A-2	We initially requested 20 acre minimum over the entirety of the property. That did not seem unreasonable to us because our immediate neighbors to the north (Japatul Estates, an extensive development on Larry Lane) are developed on 8 acres and less; and the same is true of our immediate neighbors touching our westernmost boundary across Japatul Valley Road.	This comment expresses the property owner's preference for the Project to assign a 20-acre minimum lot size to his property based on the rationale that development to the north and west is even denser. The County of San Diego acknowledges and appreciates this comment. The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis, but instead comments on the merits of the project. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
A-3	We greatly appreciate the fact that the Alpine Community Planning Group has always supported our request for this classification with unanimity which is unusual, to say the least. The Japatul Valley is a fertile area with plenty of water.	The commenter notes that the Alpine Community Planning Group unanimously recommended a Rural Lands 20 (RL-20) designation for the two referenced two parcels (APNs 524-040-02-00 and 524-040-03-00) which total 120 acres (SANGIS), not 475 acres indicated by the commenter. Both the proposed Project and Alpine Land Use Map Alternatives assign a RL-20 designation for these parcels. The County of San Diego acknowledges and appreciates this comment. The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
A-4	However, the San Diego County Planning Commission did not entirely agree. They recommended that only 120 acres of our holding be allowed the 20 acre minimum classification of RL-20. This recommendation is shown in Figure 4-3A of the Alpine Land Use Map Alternative.	The comment correctly states that the County Planning Commission recommended RL-20 for the two parcels referenced in this letter (APNs 524-040-02-00 and 524-040-03-00) and that these parcels total approximately 120 acres. The County of San Diego acknowledges and appreciates this comment. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.

	Comment	Response to Comment
A-5	While we would prefer the recommendation of the Alpine Planning Group, we can accept the recommendation shown in Figure 4-3A, so long as we can "cluster" lots in our preferred areas near other developments of similar size, and realize a potential of at least 14 lots	While this comment states a preference for a RL-20 designation for all 475 acres of the commenter's property, the commenter shows willingness to support a combination of RL-20 and RL-40 as assigned on the Alpine Land Use Map Alternative. Subdivision under both the RL-20 and RL-40 designations would require development to be clustered in accordance with the County Conservation Subdivision Program. The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis, but instead comments on the merits of the project. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.

Responses to Comment Letter B
Cynthia & Alberto Arce
January 28, 2016

	Comment	Response to Comment
B-1	After reading the draft of the Supplementary Environmental Impact Report, my husband and I are very impressed with the scope and depth of the report and the consistent and coherent vision and analysis of possible regional growth based on 10 fundamental principles intended to guide future growth within the County. We appreciate the leadership of the APG in ensuring that the study for this project has moved forward over recent months.	This comment is an introduction to comments that follow. No further response is required.
B-2	As property owners of a 5-acre parcel on Alpine Blvd near East Willows Road, we want to indicate our support for the "Proposed Project" in the SEIR and our rejection of both the "Mid-density Alternative" and the "Alpine Alternative Land Use Map." We believe that the "Proposed Plan" is the only plan that ensures that the area where our property is located is included in the benefits of development.	This comment expresses the property owners' preference for the Draft SEIR proposed Project, which would assign a Semi-Rural 1 (one dwelling unit per acre) designation to their property. The County of San Diego acknowledges and appreciates this comment. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR, but instead indicates the commenter's preference for the proposed Project. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
B-3	The "Alpine Alternative" would propose to maintain the current or existing General Plan densities of 1 dwelling unit per 4 acres. This would ensure that the existing inadequate roadway widths, dead-end roads, one-way roads, and gated communities would continue to impair emergency access in this area. In the absence of the benefits of "Proposed Plan" by the County, we will continue to be unsafe when faced with an emergency.	This comment implies that a higher density than the current density of one dwelling unit per four acres is necessary to resolve existing issues for the area, such as "inadequate roadway widths, dead-end roads, one-way roads, and gated communities". The County of San Diego acknowledges this concern; however, the comment does not raise an issue concerning the sufficiency of the analysis in the Draft EIR. As discussed in SEIR Chapter 4 subsection 4.4.2.13, with implementation of mitigation measures identified in subsection 2.13.4, buildout of the Alpine Alternative would result in existing inadequate roadway widths, dead-end roads, and one-way roads, and gated communities continuing to occur in the unincorporated County, all of which have the potential to impair emergency access. However, these potentially significant direct and cumulative impacts to emergency access would be reduced to below a level of significance with implementation of the mitigation measures identified in SEIR subsection 2.13.4, in addition to compliance with applicable regulations. Therefore, mitigation measures Tra-1.4,

	Comment	Response to Comment
		Tra-4.2 and Tra-4.4, in addition to compliance with applicable regulations, would reduce impacts with respect to road conditions and emergency access to a less than significant level. Mitigation measure Tra-1.4 will ensure that appropriate site design and mitigating measures are applied to prevent road hazards associated with future development. Mitigation measure Tra-4.2 would require new development meet Building and Fire Codes, including secondary access requirements and construction of fire apparatus access roads that are designed and maintained to support the imposed loads of fire apparatus. Mitigation measure Tra-4.4 would require subdivisions meet design and accessibility standards. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
B-4	The second major concern about the alternative plans is that our parcel and those around us are not included in the improvement of water quality standards as planned in the "Proposed Plan." As the report indicated, "Violation of ground water quality standards by designating land uses that would be ground water dependent in areas currently exposed to ground water contamination."	This comment expresses opposition to retaining the current one dwelling unit per 4 acre density because the property would not benefit from “the improvement of water quality standards as planned in the ‘Proposed Plan’”. This comment addresses the policies behind the Project and does not raise an issue with respect to the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
B-5	In conclusion, the "Proposed Plan" for East Alpine is the only plan that ensures that the benefits of development will be based on the 10 guiding principles for future development of Alpine. Ensuring the safety of all through well planned roads and emergency access is critical to us, and access to quality water is essential in any plan for the future.	Similar to Comment B-2, this comment expresses the property owners’ preference for the Draft SEIR proposed Project and does not raise an issue with respect to the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
B-6	We believe that those who support the "Mid-density Plan" or the "Alpine Alternative Land Use Map" are not guided by the 10 sound principals underlying the proposed future development of Alpine. Self-interest of a few cannot prevail over the consistent and coherent vision of regional growth.	Please refer to the Response to Comments for Comments B-2 and B-5.

Responses to Comment Letter C
Mary Kay Borchard
January 29, 2016

	Comment	Response to Comment
C-1	For the following reasons we again request Rl20 in the Japatul lane area of Alpine, and object to the RL40 designation as recommended by the County Planning and Development department.	This commenter requests a RL-20 (Rural Lands 20 or one dwelling unit per 20 acres) designation for her property and raises an objection to a RL-40 designation (Rural Lands 40 or one dwelling unit per 40 acres). The Draft SEIR proposed Project assigns a RL-20 designation to the commenter's property; the comment does not raise an issue concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
C-2	There is no significant impact in the SEIR, and the draft recirculated SEIR with an RL20 designation.	The County does not agree that that the Draft SEIR does not raise a significant impact with assigning a RL-20 designation for the commenter's property. While the Draft SEIR does not identify impacts specific to the commenter's property, the Draft SEIR evaluates potential environmental impacts resulting from this proposed Project. Table SEIR S-2 provides a summary of Project impacts and SEIR Chapter 7 identifies policies and mitigation measures that would minimize potentially significant environmental impacts resulting from implementation of the proposed Project.
C-3	The Rl20 designation has consistently been upheld and approved by the Alpine Community Planning Group throughout many meetings over the past several years, as well as recommended to the county in the draft SEIR and Recirculated SEIR.	The commenter notes that the Alpine Community Planning Group consistently approved a RL-20 designation. The comment does not raise an issue concerning the sufficiency of the Draft SEIR's analysis, but concerns the commenter's preference for the RL-20 designation. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Refer to Response C-1.
C-4	The Japatal area is part of the Alpine community, and not remote or removed back country area.	This comment indicates that the "Japatul area is part of the Alpine community, and not remote or removed back country area". The County agrees that the subject property is within the Alpine Community Planning Area, which is generally not considered in the back country are of San Diego County. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.

	Comment	Response to Comment
C-5	The downsizing to the RL40 designation would create hardship, reduce property value, and degradation of the area insuring future blight. Almost all the petitioning owners of properties on Japatul are seniors over the age of 65. Directly and cumulatively the RL40 designation would impact the quality, character and vitality of the Japatul lane area. RL 20 would allow the ability to retain and enhance the rural character and economy of the Japatul and Alpine area.	This comment asserts that a lower density RL-40 designation would create hardship, reduce property value and cause degradation to the area. The comment expresses the commenter's opinion that impacts will occur and will be included in the administrative record that is considered by the decision-makers in evaluating the Project.
C-6	We respectfully ask your favorable consideration and grant us the deserved RL20 designation.	This comment asks for favorable consideration of a RL-20 designation. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
C-7	I did not address concerns of the Forest Service as we are tax paying private property owners and not indentured buffers of the National Forest. And though not as financially lucrative, we are perhaps the better stewards of the land and neighbors, than SRPL.	This comment contends that the private property owners are better stewards of the land than "SRPL"; however, the comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
C-8	As to the concern of wildfires, we are in a high fire area, as is most of the county now, not just Japatul and not just Alpine. But during the last big fire, prior to staging at Viejas, the Fire Fighters staged at the end of Japatul Lane as the topography and geography allow it. RL-20 is the deserved designation for our area.	The County does not concur that the wildfire risk should not be considered when assigning a land use designation. Wildfire risk is considered in conjunction with other General Plan planning principles when assigning land use designations, such as the General Plan Community Development Model, physical constraints and natural hazards of the lands and community and stakeholder interests and was done so when the land use designations were developed for the proposed Project and Project alternatives. In addition, SEIR Section 2.6.3.7 analyzed wildland fire impacts and concluded that implementation of the proposed Project would result in significant and unavoidable direct and cumulative impacts related to wildland fires.

Responses to Comment Letter D
Robert & Sharon Beale
February 1, 2016

	Comment	Response to Comment
D-1	We request RL20 land use designation for our home and property. The affected property owners who live on Japatul Lane and the Japatul Valley have repeatedly asked for the RL-20 designation, and have had the consistent support and recommendation to the County on this designation.	This commenter requests a RL-20 (Rural Lands 20 or one dwelling unit per 20 acres) designation for his property. The Draft SEIR proposed Project assigns a RL-20 designation to the commenter's property. The comment does not an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
D-2	We have lived on Japatul Lane for generations and are very much invested in the character and vitality of the land and our home. We would like to be able to continue to enjoy living in the Japatul Valley with, and for, our adult children, adult grandchildren, and future great grandchildren.	The commenter states that they have "lived on the Japatul Lane for generations" and want to continue to enjoy living in the Japatul Valley for generations. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.

Responses to Comment Letter E
Danny & Robin Ervin
February 1, 2016

	Comment	Response to Comment
E-1	We have lived in the Japatul Valley for generations and request RL-20 designation for our property.	The comment requests a RL-20 (Rural Lands 20 or one dwelling unit per 20 acres) designation for their property. The Draft SEIR proposed Project assigns a RL-20 designation to the commenter's property. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
E-2	Our immediate neighbors to the West have one residence on 5 acres, the immediate neighbor to the North has one residence on 8 acres, and our neighbors to the East and North have larger parcels.	This comment identifies the relative parcel sizes of the neighboring properties. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
E-3	We affected property owners in the Japatul Valley area have requested RL-20 designation, and oppose the Planning and Development Services blanket Rl-40 proposed designation. The Alpine Community Planning Group has consistently supported our Rl-20 request throughout the many meetings over the last several years on the FCI lands General Plan Amendment. We respectfully request you grant us RL-20 designation for our property and home.	The comment reiterates support for a RL-20 designation and opposition to a RL-40 designation (one dwelling unit per 40 acres), as assigned by the Alpine Alternative Land Use Map, Mid-density and Modified FCI Condition alternatives. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine whether to approve the proposed Project or one of the alternatives analyzed in the Draft SEIR.

Responses to Comment Letter F
Sharon Haven (Hinkle)
February 15, 2016

	Comment	Response to Comment
F-1	In July 2012, The Alpine Community Planning Group voted decisively for the lands in the Japatul Valley requesting RL-20 to receive that classification in the new plan. They have never wavered in that position, despite taking several votes on the overall plan since that time. In fact, this is the only vote taken on the plan which received the unanimous vote of all present.	The commenter notes that the Alpine Community Planning Group consistently approved a Rural Lands 20 (RL-20) designation with a density of one dwelling unit per 20 acres. The Draft SEIR proposed Project assigns a RL-20 designation to the lands in the Japatul Valley. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
F-2	Dortheia Hinkle's 237 acre holding (APN 523-150-10 and 524-031-19) shown in the "Project Map," Figure 4-2.1A Mid Density Alternative for Alpine, and in Figure 4-3A of the Alpine Land Use Alternative Map, is one of these properties. It is located immediately adjacent to the Japatul Spur, and is in close proximity to sites developed at eight acre minimum and less. She had requested 20 acre minimum over her entire site.	The commenter requests a RL-20 designation to the referenced property (APNs 523-150-10, 524-031-19), which is consistent with the designation assigned by the proposed Project. The commenter provides her opinion that the proposed Project should be adopted and does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
F-3	In November of 2013, the SD County Planning Commission heard the Alpine Community Plan. They reviewed the Plan supported by the Alpine Community Planning Group, as well as the Staff Recommendation. In the case of Mrs. Hinkle's property, they recommended that the portion of her property, closest to the Japatul Spur (approximately 60 acres), be designated RL-20. Subsequently, in June 2014, the Board of Supervisors heard the various plan alternatives and was unable to make a decision at that time on this area. It was sent back to staff for more review.	This comment correctly notes the action taken by the County Planning Commission in November 2013 when recommending land use designations and that the Board of Supervisors was unable to make a decision on the property during the June 2014 hearing when they considered revisions to the land use map for this project (FCI Lands GPA). The Draft SEIR considered three separate land use scenarios for the two parcels identified in Comment F-2, as identified below. a. Proposed Project – RL-20 for both parcels, APNs: 523-150-10 and 524-031-19. b. Alpine Alternative Land Use Map alternative – RL-20 for APN 524-031-19 and RL-40 for APN 523-150-10. c. Mid-density and Modified FCI Condition alternatives – RL-40 for both parcels. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.

	Comment	Response to Comment
F-4	Mrs. Hinkle is willing to accept the Planning Commission recommendation as shown in figure 4-3A as a compromise to her original request. She recognizes that the terrain above the recommended 60 acres is rougher and less developable. She personally believes that there are several landmarks on the property that would be more protected if the upper area was to remain largely undeveloped. She hopes to be able to cluster her allowable lots on the lower portion of her land. That area is without steep slope, and is without significant preservable habitat.	This comment notes that the designations assigned by the Alpine Alternative Land Use Map alternative (see Response to Comment F-3) for the commenter's property would be acceptable. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine whether to adopt the proposed Project or a Project alternative.
F-5	The Japatul Valley is an area that needs more development to remain viable. The Sunrise Powerlink devastated much of the Valley, and has left its definable mark. Areas such as Mrs. Hinkle's, with close proximity to a major circulation road and ample water, need to have the ability to expand the base of the Valley population and provide home sites that are of manageable size.	This comment notes that additional development is necessary in the Japatul Valley to counteract the impacts of the Sunrise Powerlink and further contends that increased development in this area is warranted because the area is located in "proximity to a major circulation road and ample water". Mitigation Measure LAN-1.1 requires coordination of land use planning and the Sunrise Powerlink. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
F-6	We support the Planning Commission recommendation as shown in the "Alternative Alpine Plan."	This comment reiterates support for the Alpine Alternative Land Use Map alternative, as addressed in Response to Comment F-4. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.

Responses to Comment Letter G
Sharon Haven (Windfall Ranch)
February 15, 2016

	Comment	Response to Comment
G-1	I represent Terry and David How in the matter of securing appropriate land use classifications for their property known as WINDFALL RANCH on Japatul Road. Ms. Howe appeared before the Alpine Community Planning Group along with other land owners in mid-2012 to ask that their land be considered for 20 acre minimum. The Planning Group was extremely supportive, and in subsequent votes never wavered in nearly unanimous approval for that classification in that area.	The commenter notes that the property owner of Windfall Ranch is requesting a Rural Lands 20 (RL-20) designation with a density of one dwelling unit per 20 acres, which was also supported by the Alpine Community Planning Group in mid-2012. The Draft SEIR proposed Project assigns a RL-20 designation to the subject property. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR, but concerns the commenter's preference for the proposed Project. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
G-2	The Howe property, in particular, is deserving of this classification because it is located on both sides of Japatul Road, providing more than adequate circulation with several opportunities to improve such circulation for the area in general. . On its northernmost boundary, Larry Road, it is neighbored by the 8 acre and smaller subdivision of Japatul Estates, while its western boundary is bordered by more small lots. There are no "dead end road" issues, and there is a positive effect to be gained for the area as a whole by allowing the 20 acre minimum classification over the entire property.	This comment notes that a RL-20 designation is warranted because the property has adequate circulation and neighboring properties with even greater densities. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
G-3	In November of 2013, the Planning Commission recommended approval for 20 acre minimum over 120 acres of the Howe holding, In June of 2014, the Alpine FCI lands were heard before the Board of Supervisors, and they were unable to make a final decision on this issue.	This comment notes the action taken by the County Planning Commission in November 2013 when recommending land use designations and that the Board of Supervisors was unable to make a decision on the property during the June 2014 hearing when they considered revisions to the land use map for this project (FCI Lands GPA). The action taken by the Planning Commission is represented by the Alpine Alternative Land Use Map alternative. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. See Response to Comment A-4.

	Comment	Response to Comment
G-4	Although they still believe their land suitable for RL-20 overall, the Howes are will to accept the Planning Commission recommendation of 20 acre minimum on 120 acres of their land - - with the understanding that they qualify to cluster that density in appropriate areas of their parcel most suitable for development. This recommendation is demonstrated in the "Alpine Land Use map Alternative": Figure 4-3A.	This comment notes that the designations assigned by the Alpine Alternative Land Use Map alternative would be acceptable to the property owner. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine the final land use designations for the Project. Also see Response to Comment A-5.

Responses to Comment Letter H
Sharon Haven (APNs 404-231-03 and 404-240-18)
February 16, 2016

	Comment	Response to Comment
H-1	I have been working with the property owners, Staff, and the Alpine Community Planning Group on the reclassification of this land holding for several years. The immediate neighbors to the north (which this property wraps around) are in full agreement with the changes in classification. The property touches a very dense mobile home park on its' western side, and is immediately adjacent to the site of the proposed Alpine High School. Its eastern boundary is tangent to the West Willows off ramp.	This comment provides the context for where the subject two parcels (APNs 404-231-03 and 404-240-18) are located. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
H-2	The classification of VR-2 is entirely appropriate for the residential sector of this property. The recommendation of staff for 2.4 acres of Rural Commercial is also completely reasonable given the site's proximity to freeway ingress and egress.	This comment provides support for the land use designation assigned by the Draft SEIR proposed Project and also by the Alpine Alternative Land Use Map, Mid-density and Modified FCI Condition alternatives. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
H-3	The Alpine Mid Density Map and the Alpine Land Use Map Alternative both reflect the wishes of not only the property owner, but multiple positive votes from the Alpine Community Planning Group and the vote of the SD County Planning Commission. The property is within the Water Service Availability Area, and the owner has been paying property taxes for years because that benefit is available to them, though not presently in use. Sewer access is a reasonable distance away.	The comment expresses support for the designations assigned by the Mid-density and Alpine Alternative Land Use Map alternatives. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
H-4	On behalf of the property owners, I support the findings of the SEIR on this property.	This comment reiterates the support for the Draft SEIR proposed Project discussed in Comments H-1 through H-3. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.

Responses to Comment Letter I
Sharon Haven (Campbell Creek Ranch)
February 18, 2016

	Comment	Response to Comment
I-1	The above referenced APNs describe the property known as the Campbell Creek Ranch. It is located across Alpine Boulevard from property designated for Rural Commercial. It is immediately adjacent to densely developed mobile home property on its' western boundary, proposed Rural Commercial on its' eastern boundary, and proposed VR-2 on its' southern boundary.	This comment provides the context for where the subject four parcels (APNs 404-042-05; 404-050-55; 404-231-02 and 404-240-13) are located and that the parcels are adjacent to parcels to the south, which are designated a similar density of two dwelling units per acre or Village Residential 2 (VR-2). The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
I-2	It is within a few hundred feet of the property proposed for the new high school in Alpine. It is within the Water Service Area, and within a reasonable distance of prospective sewer service.	Further context is provided for the subject property with this comment and, as with Comment I-1, does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
I-3	The Alpine Community Planning Group and the San Diego County Planning Commission have approved this property for exactly this classification. The Board of Supervisors reviewed these uses for this and other properties and voiced no disapproval at their July 25, 2014 meeting.	The commenter correctly notes that both the Alpine Community Planning Group and the County Planning Commission recommended VR-2 for the subject property, which is consistent with how this property is designated by the Draft SEIR proposed Project and the Alpine Alternative Land Use Map, Mid-density and Modified FCI Condition alternatives. Likewise the Board of Supervisors endorsed the VR-2 designation for this property. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
I-4	I support the Alpine Mid Density Map and the Alpine Land Use Map Alternative which show the above designations for this property.	This comment expresses support for the Mid-density and Alpine Alternative Land Use Map alternatives, which assign the same designations for the subject property as the proposed Project. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine whether to approve the Proposed Project or an alternative to the Project.

Responses to Comment Letter J
Janice & Collin Campbell
February 18, 2016

	Comment	Response to Comment
J-1	CCR is immediately adjacent to an intensely developed mobile home park and a few hundred feet from the anticipated site of our new High School, 4040420100, 4042310500. CCR is within the "Village Core" of Alpine and within the Water Service Area of the Padre Dam Municipal Water District. When the High School is constructed, sewer will also be within a reasonable distance of our site.	This comment letter addresses the same property (Campbell Creek Ranch) as Comment Letter I, with APNs 404-042-05; 404-050-55; 404-231-02 and 404-240-13. The comment provides context for where this property is located, including adjacent properties, and that the property is within the service area for the Padre Dam Municipal Water District and the site for a proposed new high school for Alpine. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
J-2	We also support the proposed Rural Commercial designations for our northern neighbors across from us along Alpine Boulevard and the Augustyne-Kaderabek family near the West Willows off-ramp.	The commenter indicates further support for the Rural Commercial designation assigned to the adjacent property by the Draft SEIR proposed Project and also by the Alpine Alternative Land Use Map, Mid-density and Modified FCI Condition alternatives. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine the final land use designations for the Project.
J-3	CCR could be a perfect site for future multi-family residential growth. We have a deep love and appreciation for this property and want to see It evolve in a manner that is appropriate to Alpine community needs while maintaining much of its wild, natural beauty. We fully approve the recommended SEIR VR-2 reclassification which has been consistently supported by the Alpine Planning Group, the San Diego Planning Commission and your PDS department over the past several years providing for responsible development and growth while preserving open space consistent with the San Diego County GPA.	This comment also indicates support for a Village Residential 2 (VR-2) designation, or two dwelling units per acres, which was also supported by the Alpine CPG and County Planning Commission. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine the final land use designations for the Project.

	Comment	Response to Comment
J-4	We support the recommendation of PDS Staff as seen in both the Alpine Mid Density Map and the Alpine Land Use Map Alternative of the SEIR.	This comment expresses support for the Mid-density and Alpine Alternative Land Use Map Alternatives, which assign the same designations for the subject property as the Draft SEIR proposed Project. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine the final land use designations for the Project.

Responses to Comment Letter K
Alberto & Cynthia Arce
February 24, 2016

	Comment	Response to Comment
K-1	After reading the draft of the Supplementary Environmental Impact Report regarding the land use and zoning designations for the former FCI lands, my husband and I want to express our appreciation of the scope and depth of the report and the consistent and coherent vision and goals of the future regional growth of the county, based on the 10 guiding fundamental principles in the report. Over the past few years, we have attended many meetings of the Alpine Planning Group regarding land use designations for this area as well as the June 2014 meeting of the Board of Supervisors. We greatly appreciate the work of the BOS, Robert Citrano, and the current leadership of Travis Lyon of the APG in ensuring that the study for the General Plan Amendment based on land use designations has moved forward over recent months resulting in the SEIR draft.	This comment is an introduction to comments that follow. This comment letter addresses the same property as Comment Letter B. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision makers in evaluating the project.
K-2	As property owners of a 5-acre parcel on Alpine Blvd between Montecito Road and East Willows Road, we want to indicate our support for the SD County's "Proposed Project" in the SEIR and our rejection of both the "Mid-density Alternative" and the "Alpine Alternative Land Use Map." We believe that the "Proposed Plan" is the only plan that ensures a coherent and consistent plan for development of the area where our property is located. The County proposal for the land use designation here would increase population density by changing from the current SR-4 to SR-1. This would ensure that our property would be included in the expansion of water and sewer service areas required to serve the increased densities proposed.	The comment generally expresses a preference for the Draft SEIR proposed Project, which would assign a Semi-Rural 1 (one dwelling unit per acre) designation to their property, rather than the Mid-density and Alpine Alternative Land Use Map alternatives, which would retain the property's current density of one dwelling unit per four acres. See Responses B-2, K-4 and K-5. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine whether to approve the proposed Project or an alternative to the Project.

	Comment	Response to Comment
K-3	The "Alpine Alternative" would propose to maintain the current or existing General Plan zoning with densities of 1 dwelling unit per 4 acres, and to exclude our parcel and those around us from the benefits of development and the improvement of water quality standards as planned in the "Proposed Plan." As the report indicated, the alternative plan would be a "Violation of ground water quality standards by designating land uses that would be ground water dependent in areas currently exposed to ground water contamination." The County's proposed plan ensures access to quality water for all, which is essential in a consistent and coherent plan for the future development of this area.	This comment generally expresses opposition to retaining the current one dwelling unit per acre density because the property would not benefit from "the improvement of water quality standards as planned in the 'Proposed Plan'". The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR, but concerns the commenter's preference for the proposed Project. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
K-4	A second observation and grave concern of ours is that, over the years, the current zoning here has resulted in a very unsafe environment. Due to inadequate roadway widths, many dead-end roads, many one-way roads, and gated communities, there is no emergency access in this area. There are junkyards, trash and other fire hazards up behind Montecito Road which epitomize the lack of safety here with no emergency access. In the absence of the benefits of the County's "Proposed Plan," we would continue to be unsafe when faced with a true emergency. Without the well planned roads and emergency access throughout San Marcos and Carlsbad, the 2014 & 2015 fires would have caused much greater damage and would have been much more challenging to contain. Ensuring the safety of all Alpine residents through well planned roads and emergency access is critical to us all.	This comment generally implies that the current density of one dwelling unit per four acres has resulted in "a very unsafe environment," such as: inadequate roadway widths, dead-end roads, one-way roads, gated communities, fire hazards and a lack of emergency access. Future development will be subject to the policies and mitigation measures identified in the Draft SEIR that will address many of these conditions, whether constructed at a density of one dwelling unit per four acres or higher. SEIR Section 2.13 Transportation and Traffic identifies the mitigation measures that future development would be required to implement, they include but are not limited to: • SEIR Section 2.13.4.1 includes Mitigation Tra-1.3 which requires new development implement County Road Standards. • SEIR Section 2.13.4.3 includes Policy M-4.4 which will ensure new and improved roads are constructed with adequate widths and can accommodate emergency vehicles. • SEIR Section 2.13.4.3 includes Policy M-3.3, which requires development provide multiple ingress/egress routes. • Gated communities — This comment does not raise an issue related to an environmental issue pursuant to CEQA; therefore, no further response is required. SEIR Section 2.6.3.3 concludes that impacts associated with emergency access as a result of the proposed Project would be reduced to below a level of significance with implementation of the applicable mitigation measures. SEIR Section 4.3.2.13 concludes that the other alternatives

	Comment	Response to Comment
		with less intensive development, such as the Mid-density alternative, would result in less vehicle trips generated on local roadways, which would translate to fewer conflicts with emergency access; however, impacts would still be considered potentially significant and the applicable policies and mitigation measures identified in this SEIR would be required. Wildland fire impacts are addressed in SEIR Section 2.6.3.7 and the SEIR determines that while potentially significant impacts resulting from implementation of the proposed Project would be reduced by the regulations, policies and mitigation measures identified in the SEIR, the impacts would not be reduced to below a level of significance. As such, implementation of the proposed Project would result in significant and unavoidable direct and cumulative impacts related to wildland fires. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine whether to approve the proposed Project or an alternative to the Project.
K-5	After a thorough review of the SEIR Report, we want to express that we whole heartedly disagree with and reject the new alternative referred to in the draft as the "Mid-density alternative," where a few of our more vocal neighbors in the Montecito Road area propose "reduced densities on specific parcels to further reduce Project impacts associated with biological resources, fire hazards, increased urban unauthorized access, improvement to infrastructure, etc." Under the County's Proposed Plan, our neighbors' properties would be part of the larger plan, yet the owners would not have to subdivide and increase density on their land if they choose not to. The "Mid-density alternative, however, would exclude our properties from the benefit of the future development of all of Alpine and have a negative impact on the value of the land here. We believe that those who support the "Mid-density Plan" or the "Alpine Alternative Land Use Map" are not guided by the 10 sound principles and goals of the proposed future development of Alpine	The County appreciates the comments' concern to resolve issues such as fire hazards and a lack of infrastructure, and the opposition to Draft SEIR alternatives that retain a density of one dwelling unit per four acres on the subject property. Land use designations in and of themselves do not create unsafe conditions. The impacts identified in this comment predate the 2011 General Plan Update. This comment conveys the commenters' disagreement with the Mid-density alternative, which assigns a density of one dwelling per four acres to their property, whereas the proposed Project assigns a density of one dwelling unit per acre. A comparison of the Mid-density alternative to the proposed Project for biological impacts can be found in SEIR Section 4.3.2.4. This section concludes that, as with the proposed Project, impacts to special status plant and wildlife species, riparian habitat and wildlife corridors associated with buildout of the Mid-density alternative would remain significant and unavoidable after implementation of the applicable policies and mitigation measures.

	Comment	Response to Comment
	Blvd east of Viejas and south of interstate 8. This land must be included in the consistent and coherent vision for the future regional growth of San Diego County.	SEIR subsection 4.3.2.6 compares the wildland fire impacts of the Mid-density alternative with the proposed Project. The SEIR concludes that, as with the proposed Project, impacts from wildland fires would not be reduced to below a level of significance; thus, the impact would remain significant and unavoidable. The comment provides the commenter's opinion and will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine the final land use designations for the Project.

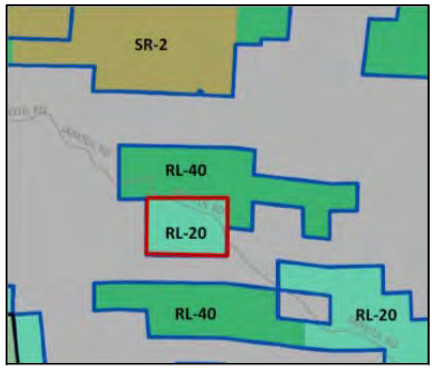
Responses to Comment Letter L
Endangered Habitats League
February 29, 2016

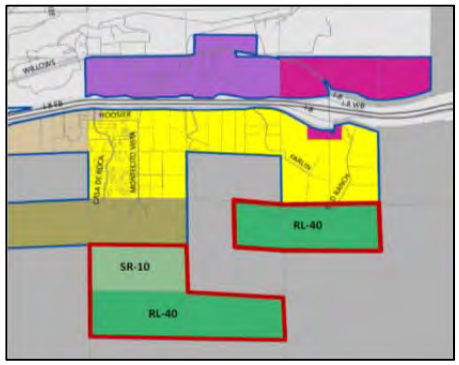
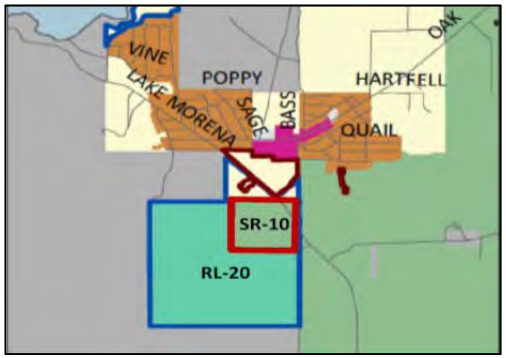
	Comment	Response to Comment
L-1	The Endangered Habitats League (EHL) appreciates the opportunity to comment on the Draft Supplemental Environmental Impact Report (SEIR) that was prepared for the County's proposed General Plan Amendment on about 72,000 acres of backcountry land previously zoned under the Forest Conservation Initiative (FCI). For your reference, EHL is Southern California's only regional conservation group. For over a dozen years, EHL worked collaboratively with the County and other stakeholders to develop a truly sustainable General Plan that accommodates growth while reducing public infrastructure costs and increasing conservation of San Diego's world-class biodiversity and scenic landscapes.	This comment is an introduction to comments that follow. No further response is required.
L-2	EHL submits that the proposed Project would create numerous significant adverse impacts that could be substantially lessened or avoided by adoption of the environmentally superior, Modified FCI Condition Alternative ("Modified Project").	This comment states that the Modified FCI Condition alternative would result in "substantially lessened or avoided" impacts than the Draft SEIR proposed Project. This statement is consistent with the content and results of the analysis of the Draft SEIR and does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine whether to approve the Proposed Project or an alternative to the Project.
L-3	As is explained in detail below, the California Environmental Quality Act (CEQA) contains a substantive mandate precluding adoption of a Project where feasible alternatives that achieve most project purposes and which avoid or substantially lessen significant environmental impacts exist. Because the environmentally superior Modified Project meets these tests, the County has no substantial evidence that no such alternative exists. It therefore cannot make the necessary findings that are a predicate to approve a Project with significant impacts via a finding of overriding considerations.	The comment correctly identifies the Modified FCI Condition alternative as the Environmentally Superior alternative, as disclosed in the Draft SEIR. As noted by the commenter, CEQA Guidelines Section 15126.6(c) provides that the bases for rejecting alternatives include: "(i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts." The SEIR discloses that the significant and unavoidable impacts associated with the proposed Project remain significant and unavoidable for the Modified FCI Condition alternative and all of the other Project alternatives, except the No Project alternative, as no additional feasible mitigation or avoidance measures have been identified

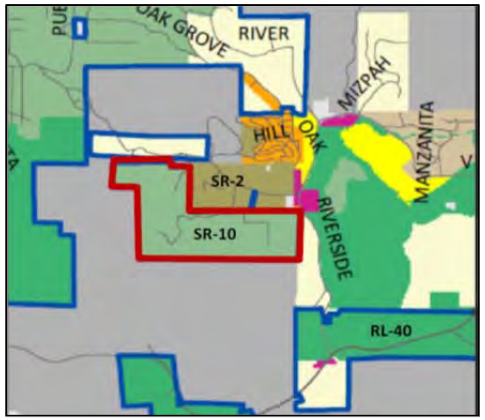
	Comment	Response to Comment
		to reduce impacts associated with the alternatives to achieve a less than significant impact determination. In making the findings required by CEQA Guidelines Section 15091, the Board of Supervisors will consider this and all other information included in the SEIR and the administrative record for the project. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine whether to approve the Proposed Project or an alternative to the Project.
L-4	Indeed, the SEIR acknowledges that the Modified Project's reduced development intensity results in less modification of the landscape, "thus decreasing environmental impacts in *all* issue areas evaluated."(SEIR at p. S-7, emphasis added.) Moreover, because this alternative fully meets all Project objectives and in most cases better than the proposed Project-and no substantial evidence exists to support a contrary conclusion-CEQA requires its adoption in lieu of the proposed Project.	The County agrees that the Modified FCI Condition alternative reduces the severity of potential impacts when compared to the Draft SEIR proposed Project. However, the significant and unavoidable impacts of the project are not avoided with this alternative. See Global Response 1 (GR-1). In addition to this factor, the Board of Supervisors will also consider whether the alternative meets the basic objectives of the project and will make the findings required by CEQA Guidelines Section 15091. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
L-5	In the discussion below, we briefly summarize the stated Project objectives, the Project and environmentally superior Modified Project, the comparative impacts, and finally an evaluation of the uncontroverted evidence showing the Modified Project's superior ability to meet the Project objectives as compared with the Proposed Project.	This comment is an introduction to comments that follow. See Global Response 1 (GR-1). No further response is required.
L-6	The Project objectives are the same as those of the County of San Diego General Plan: • Support a reasonable share of projected regional population growth; • Promote sustainability by locating new development near existing infrastructure, services, and jobs; • Reinforce the vitality, local economy, and individual character of existing communities while balancing housing, employment, and recreational opportunities; • Promote environmental stewardship that protects the range of natural resources and habitats that uniquely define the County's	The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.

	Comment	Response to Comment
	character and ecological importance; • Ensure that development accounts for physical constraints and the natural hazards of the land; • Provide and support a multi-modal transportation network that enhances connectivity and supports community development patterns; • Maintain environmentally sustainable communities and reduce greenhouse gas (GHG) emissions that contribute to climate change; • Preserve agriculture as an integral component of the region's economy, character, and open space network; • Minimize public costs of infrastructure and services and correlate their timing with new development; and • Recognize community and stakeholder interests while striving for consensus. In addition, the following two Project-specific objectives are added: • Assign land use designations in a manner consistent with the Guiding Principles, Goals, and Policies of the adopted County General Plan. • Assign land use designations that minimize conflicts with the U.S. Forest Cleveland National Forest Management Plan. As is explained in detail below, every single one of these objectives is better or equally met by the Modified Project alternative.	
L-7	Nearly 2,000 additional dwelling units over the development quantity assumed in the 2011 General Plan Update would be added by the Project. (Table 1-1A.) Virtually all of these units would be spread out over the landscape in remote locations including in the Alpine, Central Mountain, Jamul/Dulzura, North Mountain, and Mountain Empire subregions. All of the affected 71,715 acres are located east of the County Water Authority line, and distant from infrastructure, services, public safety resources, and jobs. Indeed, FCI lands represent some of the most rugged, inaccessible areas in the County.	The County appreciates the comment. The information in this comment is not at variance with the existing content in the Draft SEIR.

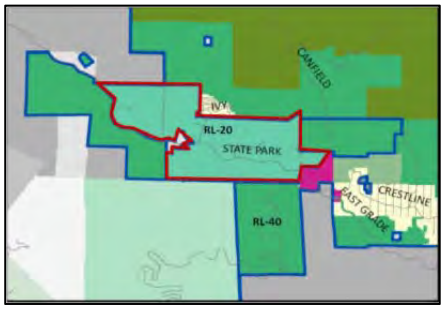
	Comment	Response to Comment
L-8	According to the SEIR, the Project would produce numerous significant unavoidable impacts. These include on Visual Character or Quality, Light or Glare, Direct Conversion of Agricultural Resources, Indirect Conversion of Agricultural Resources, Direct and Indirect Loss or Conversion of Forestry Resources, Air Quality Violations, Non-Attainment Criteria Pollutants, Sensitive Receptors, Special Status Species, Riparian Habitat and Other Sensitive Natural Communities, Wildlife Movement Corridors and Nursery Sites, Wildland Fires, Water Quality Standards and Requirements, Groundwater Supplies and Recharge, Mineral Resources Recovery Sites, Permanent Increase in Ambient Noise Level, Schools, Traffic and LOS Standards, Rural Road Safety, Adequate Water Supplies, Sufficient Landfill Capacity, Compliance with AB 32, and Effects of Global Climate Change on the Proposed Project. Only if no feasible alternatives meeting most Project objectives exist may the Project be approved consistent with CEQA.	The comment correctly lists the resources that are found to have significant and unavoidable impacts. The County does not agree with the commenter's interpretation of CEQA's findings requirements. These requirements do not remove the discretionary authority of the County Board of Supervisors in evaluating and deciding upon project alternatives. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine whether to approve the Proposed Project or an alternative to the Project.
L-9	Notable among the proposed changes is an expansion of the village in Alpine with urban densities around the Viejas reservation. This change is profound because it will involve the expansion of urban infrastructure further into the backcountry. The draft amended Community Plan for Alpine states: "Expansion of imported water and sanitary sewer services are necessary to accommodate the increased land use intensities identified on the Alpine General Plan land use map. More specifically, both imported water and sewer services are necessary to fully realize the land use intensities allowed by the Village land use designated areas along Willows Road east of Viejas and residential densities south of Alpine Boulevard between the Interstate 8 interchanges at West Willows Road and at the eastern end of Willows Road." (DEIR at p. 1-23.)	The comment is correct in identifying urban densities are proposed to the east of the Viejas casino, outlet mall and hotel. These densities will require an expansion of water and sewer infrastructure. The County does not agree with the characterization of the Community of Alpine as being "in the backcountry" of unincorporated San Diego County. Much of this community is within the County Water Authority boundary and is bisected by Interstate 8. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine whether to approve the Proposed Project or an alternative to the Project.

	Comment	Response to Comment
L-10	In addition, much the rugged former FCI lands would go from lower to higher density Rural and various Semi-Rural densities. There are some locations where the Semi-Rural designations make sense due to existing parcelization. In other areas, however, intact parcels of 40 and 80 acres and larger are being designated at higher Rural and even Semi-Rural densities (for example in Alpine). In comments on the NOP for the Project, EHL articulated several examples of such density increases:	The comment is not referencing the correct baseline for its comparative analysis. See Global Response 2 (GR-2). The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
L-11	**Alpine:** The area of 1:10 south of Abrams Ridge should change to 1:20.	The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine the final land use designations for the Project.  **Figure L-11** It appears that this comment is referring to 17 parcels (outlined in red on Figure L-11, which is an excerpt from Draft SEIR Figure 1-2A) located along Japatul Road south of the Rancho Palos Verde area in the Alpine Community Planning Area (CPA). These properties are designated Rural Lands 20 (RL-20) under the proposed Project. This is consistent with the recommendations of the commenter.

	Comment	Response to Comment
L-12	South of the Commercial district and south of Old Ranch are three large blocks of unparcelized land that should be 1:40 or 1:80 rather than 1:10.	The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine the final land use designations for the Project. This comment appears to be referring to six 40- or 80-acre parcels designated Rural Lands 40 (RL-40 or one dwelling unit per 40 acres), under the proposed Project, consistent with the commenter's recommendation, and one parcel designated SR-10 (one dwelling unit per 10 acres). The area in question is shown outlined in red on Figure L-12, which is an excerpt from Draft SEIR Figure 1-2B.  **Figure L-12**
L-13	In the area of Fusco, Burdoaks, Old Ranch and Granite Vista there should be a 1:20 density rather than 1:10. Note: This last area may be in Descanso. Note: There are two "Old Ranch" roads in different parts of the map.	This comment is referencing an area in the vicinity of the Old Ranch Road that is located in Descanso. The commenter's recommendations for this area are addressed in Response to Comment L-16.
L-14	**Lake Moreno/Campo:** The "square" immediately south of the town center, labeled SR-10, should be RL-20.	This comment, which recommends a RL-20 (one dwelling unit per 20 acres) designation, appears to be referring to the two parcels outlined in red on Figure L-14, which is an excerpt from Draft SEIR Figure 1-9. No specific rationale is provided for the commenter's recommended designation. The proposed Project and all Project alternatives assign a SR-10 (one dwelling unit per 10 acres) land use designation. One parcel is 23 acres and could subdivide into  **Figure L-14**

	Comment	Response to Comment
		two lots. The other parcel is four acres and does not have the ability to subdivide at that density. The parcels are located on Lake Morena Road just south of the Lake Morena Village adjacent to an area with a Semi-rural 4 (one dwelling unit per four acres) designation. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine the final land use designations for the Project.
L-15	**Descanso:** The area around Verna Road should be 1:20 rather than 1:10.	The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine the final land use designations for the Project. This comment appears to be referring to 16 parcels ranging in size from five to 25 acres and recommends a Rural Lands 20 designation without providing any specific rationale. These parcels are shown outlined in red on Figure L-15, which is an excerpt from Draft SEIR Figure 1-5. These parcels are assigned a Semi-Rural 10 (SR-10) designation by the proposed Project and all Project alternatives, consistent with the parcel sizes of the surrounding area. This designation is also consistent with the Descanso Community Sponsor Group and Planning Commission recommendations. The SR-10 designation is slope-dependent; therefore, areas with slope greater than 25% have a lower density of one dwelling unit per 20 acres. Due to the amount of area with slopes greater than 25%, the subject parcels would not be able to further subdivide under the SR-10 designation. Therefore, the impacts would be the same under both the SR-10 and RL-20 designations.  **Figure L-15**

	Comment	Response to Comment
L-16	The area around Old Ranch, South Forty, Campbell Ranch, and Granite Vista should be 1:20 rather than 1:10.	The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine the final land use designations for the Project. This comment is referring to 37 parcels ranging in size from approximately one to 49 acres located in the southeastern portion of the Descanso Planning Area adjacent to the Interstate 8 on-ramp at Japatul Valley Road and recommends a RL-20 designation, but does not provide any specific rationale. These parcels are designated SR-10 under the proposed Project and all Project alternatives, as shown outlined in red on Figure L-16, which is an excerpt from Draft SEIR Figure 1-5, consistent with the parcel sizes of the surrounding area. This designation is also consistent with the recommendations of the Descanso Community Sponsor Group and County Planning Commission. Under the SR-10 designation, only three of these parcels would have further subdivision potential and under the Rural Lands 20 (RL-20) designation, only the 49-acre parcel would be able to subdivide. Based on County staff's analysis as reflected in the SEIR, the RL-20 designation would not substantially reduce potential impacts beyond the SR-10 designation. **Figure L-16**
L-17	South of the Commercial district and south of Old Ranch are three large blocks of unparcelized land that should be 1:40 or 1:80. (Note: This last area may be in Alpine.)	This comment appears to be addressing the Old Ranch Road, located in Alpine. The commenter's recommendations for this area are addressed in Response to Comment L-12.

	Comment	Response to Comment
L-18	**North Mountain:** On the inset map, lands northeast of the village should be RL- 20 or RL-40 rather than SR-10.	The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine the final land use designations for the Project.  **Figure L-18** This comment appears to be referring to the area outlined in red on Figure L-18, which is an excerpt from Draft SEIR Figure 1-11. The area is designated RL-20 (one dwelling unit per 20 acres) under the proposed Project, which is consist with the designation recommended by the commenter.
L-19	Notably, neither the SEIR nor Origins of the Forest Conservation Initiative Lands GPA Project Alternatives articulates *any* planning rationale or rationale based on the Guiding Principles for these shifts to Semi-Rural in the backcountry.	This comment states there is no planning rationale or General Plan Guiding Principles derived rationale to support a change to semi-rural designations for those Project areas discussed in Comments L-11 through L-18. The County does not agree that these Project areas are "*changing*" to a semi-rural density as discussed in the rationale below. 1. Semi-rural densities are not being proposed within the Project areas referenced in Comments L-11 and L-18; 2. The comment is not referencing the correct baseline for its comparative analysis. See Global Response 2 (GR-2). Existing land use designations are shown on the No Project alternative land use maps as shown on Draft SEIR Figures 4-4.1B (Comment L-12), 4-4.8 (Comment L-14) and 4-4.4 (Comments L-15 and L-16). The existing densities shown on these maps are higher semi-rural densities being proposed by these comments. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
L-20	Nor is there any response in the SEIR to the compelling planning rationales EHL articulated in its comments on the NOP for maintaining low rural densities in these remote, rugged areas. For	This comment infers that lands within the Project area are "generally remote locations, removed from urban services and urban infrastructure" and should be assigned the lowest densities. Chapter 1, Project

	Comment	Response to Comment
	this reason, EHL repeats it here: "Forest inholdings are generally remote locations, removed from urban services and urban infrastructure, with high ecological integrity and high fire risk, Therefore, intensities of use (as reflected in assigned densities) should be at the *lowest* levels the Land Use Element allows, consistent with underlying parcelization. In other words, the number of potential new parcels should rarely increase above the baseline number of parcels, and then only in locations already substantially committed to such parcelization, so as to avoid "spot zoning." Mere adjacency to areas of existing higher density, or proximity to a roadway, is *not* sufficient rationale for up-planning. The needs to reduce fire hazard, preserve the environmental, and reduce service costs remain paramount. The current General Plan's limits of estate, semi-rural, and village development should be respected. Absent a demonstrable objective need to increase the housing capacity of the General Plan, there should be *no* expansion of Village or Semi-Rural densities into the former FCI lands. A density of 1:40 or less dense should be the default *unless unique circumstances compel otherwise*." (EHL NOP Comments, Appendix B.)	Description, Section 1.5.2.1.a of the Draft SEIR provides a general description of land use map changes based on the proposed Project. This section describes how remote areas have been designated the lowest densities (RL-40 or RL-80). Rationale is generally provided for circumstances where an RL-40 or RL-80 designation is not assigned, as discussed below. • Alpine – An extension of the Alpine Village densities, along with the provisions of urban services, is proposed along Interstate 8 to meet the community objective for a population base that can more fully support a wider range of services within CPA boundaries. • Jamul and Julian – Areas are designated as Semi-rural 10 (SR-10) based on existing parcel sizes. • Lake Morena – Areas are designated as Semi-rural 4 (SR-4), SR-10 or RL-20 based on existing parcel sizes and proximity to the existing Rural Village. • Ramona – Areas are designated as Village Residential 2 (VR-2) or SR-10 based on existing parcel sizes. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
L-21	The flaws in the Project are most clearly seen in Alpine 5, 6, 7, and 8. Indeed, Alpine can be fairly described as a planning disaster.	This comment is an introduction to comments that follow. No further response is required.
L-22	Semi-Rural densities of SR-1, SR-2, SR-4, and SR-10 are shown over large portions of 696 acres. These lands are constrained by prime agriculture, National Forest adjacency, high fire risk, lack of water and access, high biological value, and adjacency to National Forest. Existing parcelization does not justify Semi-Rural categories, and similarly unparcelized lands just to the east (and indeed, throughout the County) are designated Rural, creating inequities.	The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR, but concerns the commenter's opinion regarding the designations. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. The comment is correct that the majority of the Project area known as AL-5 is assigned semi-rural land use designations (527 of the 695 acres are assigned semi-rural designations). The comment lists many site constraints found throughout the Project areas. Per Draft SEIR Figure 2.2.1B, there are no prime agriculture lands in this area. Existing parcelization is one consideration among many used to determine the appropriate land use

	Comment	Response to Comment
		designations for Project areas, but is not the sole justification. For instance the area is directly east of the County Water Authority boundary and adjacent to Village-designated parcels.
L-23	Numerous General Plan Guiding Principles and Land Use Policies are violated.	The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
L-24	Land designated in the Project as Semi-Rural actually contains existing lots of 40 to 80 acres in size. *The proper designation is RL-20 or RL- 40.* Subdivision of intact, relatively remote land into dispersed estate lots would place more residences at fire risk, fragment habitat, increase service costs, and increase GHG emissions for the resulting long-distance commuters.	The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine the final land use designations for the Project. The County agrees that in this area semi-rural land use densities are assigned on large parcels (40 to 80 acres). Future development would need to minimize risks from wildfire in accordance with the County Building and Consolidated Fire Codes (see mitigation measure Haz-4.3, identified in SEIR subsection 2.6.4.7) and minimize impacts to sensitive biological resources in accordance with the County Resource Protection and Biological Mitigation Ordinances (see mitigation measure Bio-1.6, identified in SEIR subsection 2.4.4.1) and to accommodate expansion of services into this area. Consistent with the determinations of the SEIR, the proposed Project would result in significant and unavoidable impacts from wildland fires and greenhouse gas emissions (Climate Change). However, the fragmentation of habitats was determined to be less than significant after mitigation. There are no significance criteria for 'service costs' due to the cost of services not being related to physical impacts on the environment.
L-25	*b) Consistency with existing parcel size – Outside of villages and the County Water Authority boundary, Semi-Rural 10 or Rural Lands 20 land use designations are assigned only when the predominant parcel size is similar (10 to 20 acres) and would result in little to no additional subdivision potential.* To the contrary, the proposed SR-1, SR-2, SR-4, and SR-10 are not similar in size to the predominant parcels in these outside-Village and outside-CWA locations.	The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine the final land use designations for the Project. Please see Global Response 4 (GR-4). The County does not agree with the commenter's opinion that the proposed Project and Project alternatives are inconsistent with the planning criteria for the proposed land use

	Comment	Response to Comment
		designations relative to existing parcel size.
L-26	*c) Reduced development adjacent to CNF lands – Lower land use designations are assigned adjacent to the CNF lands to reduce density in the Wildland/Urban Interface. Additional development in this area increases the likelihood of human caused wildland fires, requires a greater commitment of resources to manage buffers between the CNF and developed areas, and increases the need for additional infrastructure and services in CNF lands.* The proposed SR-1, SR-2, SR-4, and SR-10 place Semi-Rural adjacent to the CNF across a broad interface, where fire history shows *repeated* conflagrations.	The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine the final land use designations for the Project. Please see Global Response 4 (GR-4). The County does not agree with the comment that lower densities are not assigned adjacent to the CNF lands. The densities in this area range from VR-2 (two dwelling units per acre) adjacent to Alpine Boulevard to SR-2, 4 and 10 (one dwelling unit per two, four or ten acres) adjacent to the CNF. These lower densities would allow for buffers between the CNF and dwelling units to minimize fire risk.
L-27	*d) Reduced development in areas with sensitive biological resources – Lower density residential designations are assigned in areas with high value biological resources to avoid these sensitive resources.* Significant portions of the proposed SR-2, SR-4, and SR-10 and even some SR-1 have "high" biological value.	The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine the final land use designations for the Project. Please see Global Response 4 (GR-4). The County does not agree with the comment that the land use densities assigned would not allow the sensitive resources to be avoided. Much of the areas with high value biological resources have a proposed density of one dwelling unit per ten acres, where conservation subdivisions would be required for future development. In other areas, smaller minimum lot sizes would allow sensitive resources to be avoided.
L-28	*e) Reduced development in areas without adequate access – Lower densities are assigned in areas that are one-half mile or more from public roads.* Except for a portion of SR-1, virtually all the SR-2, SR-4, and SR-10 in the Project is more than one-half mile from public roads.	The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine the final land use designations for the Project. Please see Global Response 4 (GR-4). The County agrees with the comment that portions of this area lack adequate emergency access; however, County development regulations require access improvements prior to approving development applications.

	Comment	Response to Comment
L-29	*f) Reduced development in areas with physical constraints – Lower densities are assigned in areas dominated with slopes greater than 25%.* Portions of the proposed SR-1 and proposed SR-2 are slope constrained.	The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine the final land use designations for the Project. Please see Global Response 4 (GR-4). Each of the semi-rural designations is slope dependent where the allowable density is reduced in areas where slopes are greater than 25%. In addition, other factors are relevant when considering the land use designation, such as the AL-5's proximity to Interstate 8 and the Alpine Village. All the Project alternatives assign semi-rural designations in this area, primarily due to proximity to Interstate 8 and the Alpine Village and Alpine CPG and Planning Commission recommendations. In comparison to the proposed Project, land use densities are reduced in the Alpine Alternative Land Use Map (SEIR Figure 4-3B), Mid-density (SEIR Figure 4-2.1B) and Modified FCI Condition alternatives (SEIR Figure 4-1.1B).
L-30	Lands designated SR-1 and SR-2 over portions of 427 acres are constrained by very high fire risk, biology, wetlands, slope, and adjacency to public lands. Rural densities here are appropriate unless already parcelized. However, the Project errs in designating unparcelized land for estate subdivision when it should be RL-20 or RL-40. Planning Critieria b, c, d, e, and f are all violated to various extents, such as in placing Semi-Rural adjacent to the Cleveland National Forest and in placing even SR-1 more than a half mile from a public road. Such special treatment for these property owners would create inequities. Subdivision of intact land into estate lots would place more residences at fire risk, fragment habitat, increase service costs, and increase GHG emissions for the resulting long-distance commuters.	Please see Global Response 4 (GR-4). The County does not agree that semi-rural densities are inappropriate in this area due to the areas biology, wetlands and slope, and does not agree that some owners are getting special treatment. The area referenced by this comment is adjacent to Alpine Boulevard and Interstate 8. Lower densities are proposed in areas that are a greater distance from these transportation corridors. The higher densities are proposed due to the proximity to the Interstate. SEIR Figure 2.4-1B shows that the area referenced by the comment is generally composed of scrub and chaparral; however, it also includes areas with riparian and bottomland habitat and disturbed or developed areas. SEIR subsection 4.2.2.4 determined that, as with the proposed Project, the Modified FCI Condition alternative would also result in significant and unavoidable impacts to Special Status Plant and Wildlife Species, Riparian Habitat and Other Sensitive Natural Communities and Wildlife Movement Corridors and Nursery Sites. SEIR Figure 2.2.4-3B of the SEIR shows areas with wetlands constraints. SEIR subsection 2.6.4.3 identifies mitigation that would reduce the proposed Project impacts to federally protected wetlands to below a level of significance.

	Comment	Response to Comment
		The comment is correct that portions of this area lack adequate access and are adjacent to CNF lands; however, County development regulations, such as the County Consolidated Fire Code and the County Public and Private Road Standards, require access improvements and adequate buffers from the CNF lands prior to approving development applications. Secondary access requirements in the Consolidated Fire Code would need to be met for any discretionary projects to subdivide. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine the final land use designations for the Project.
L-31	While part of AL-7 is properly designated as Rural, SR-10 improperly appears over portions of 360 acres. Consistent with the Planning Criteria, and due to numerous constraints including high fire risk, slope, biology, wetlands, water, and limited access, these properties should be RL-40.	Please see Global Response 4 (GR-4). The County does not agree that a SR-10 designation (one dwelling unit per ten acres) is inappropriate in this area due to constraints. This designation requires a conservation subdivision, which would require future development to avoid sensitive resources by clustering development to the least sensitive portions of the development area. See also Response to Comment L-30.
L-32	The RL-20 in the Project is improperly placed over large expanses of unparcelized and highly remote land with high fire risk, National Forest adjacency, biological value, agriculture value, and slope, water, and access constraints. These unparcelized properties should given densities at the bottom of the range, namely, RL-40 or RL-80. Dead-end road lengths for fire safety are also exceeded. Planning Criteria b, c, d, e, and f are all violated.	Please see Global Response 4 (GR-4). The commenter asserts that RL-20 is "improperly placed" in the area of Alpine referred to as AL-8 (see Response to Comment L-62, Figure L-62A) and this area should be designated either RL-40 or RL-80. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine the final land use designations for the Project.
L-33	No "unique circumstances" grounded in the Guiding Principles have been articulated in the Project or the accompanying SEIR to justify Alpine's gross departures. The high degree of inconsistency with the Planning Criteria – which in turn simply embody General Plan Guiding Principles, Goals, and Policies – is truly astounding.	The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine the final land use designations for the Project. Please see Global Response 4 (GR-4) and Response to Comment L-32. The comment asserts that "unique circumstances" are necessary to deviate from the RL-40 or RL-80 designations that Comment L-33 asserts are more appropriate.

	Comment	Response to Comment
L-34	The density increases in the Project and indeed all the alternatives (much less so for the Modified Project) are contrary to the 2011 General Plan's goal of reducing development in more remote, GHG-intensive locations. A major expansion of the Alpine Village is highly adverse for GHG emissions, as this new development will create long distance commutes to jobs and activity centers absent any sort of transit capacity.	The comment is not referencing the correct baseline for its comparative analysis. See Global Response 2 (GR-2). Existing land use designations are shown on the No Project alternative land use maps as shown on Draft SEIR Figures 4-4.1A through 4-4.13. In addition, the comment seeks to paraphrase Goals of the General Plan in stating that the proposed Project land use map is "contrary to the 2011 General Plan's goal of reducing development in more remote, GHG-intensive locations". There are numerous land use goals in the General Plan that speak to the appropriate location of the various land use designations. The phrase "GHG-intensive location" is not within the General Plan. As shown in the Draft SEIR Project Description, Table 1-1B (page 1-12), Rural Lands densities are assigned to 60,500 acres of the Project's 71,700 acres, or 84% of the Project area. Contrary to the assertion that village expansion generates GHG emissions, fully functional villages can reduce emissions by providing for mixed-use, walkable urban settings that do not require auto-trips to access common commercial and civil amenities. The comment contends that village expansion will require long distance commutes to jobs and activities centers; however, no information is presented in support.
L-35	Besides this inconsistency with the General Plan, the Project is inconsistent with the SANDAG RTP/SCS. This is because the latter relies on the "smart growth" land use designations of the 2011 General Plan for all of its assumptions and outcomes and does not contemplate additional rural residential density or major Village expansion *a la* Alpine. The County should not undermine the RTP/SCS through the FCI and, in the SEIR, all such impacts on regional planning should be properly analyzed. In doing so, the DEIR should follow recent court guidance regarding use of a "business as usual" comparison approach (*Ctr. for Biological Diversity v. Dept. Fish & Wildlife*, 62 Cal. 4th 204 (2015)) as well as evaluate consistency with gubernatorial Executive Orders on climate change.	The County does not agree with the comment that the proposed Project is inconsistent with the SANDAG Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS); see page 26 at: http://www.sdforward.com/pdfs/RP_final/The%20Plan%20-%20combined.pdf. The following strategy in the SANDAG RTP/SCS would be applicable to the unincorporated county: *A land use pattern that accommodates our region's future employment and housing needs, and protects sensitive habitats, cultural resources, and resource areas*. The proposed Project is consistent with this strategy because the proposed Project would protect sensitive habitats, cultural resources and resource areas by assigning Rural Lands densities over 84% of the Project area. Density increases are primarily proposed along the Interstate 8 corridor as an extension of the Alpine Village where impacts to sensitive habitat,

	Comment	Response to Comment
		cultural resources and farmland would be minimal. Further, the County does not agree that the proposed Project would undermine the RTP/SCS strategy because of the proposed linear expansion of the Alpine Village. The current Alpine Village is part of the RTP/SCS as it is identified as an existing/planned Rural Village on the SANDAG Smart Growth Concept Map (refer to Smart Growth in the San Diego Region brochure at: http://www.sandag.org/uploads/projectid/projectid_296_13993.pdf) As discussed in this brochure the San Diego Forward: The Regional Plan calls for better coordination between land use and transportation. The "Smart Growth Concept Map" identifies locations in the region that can support smart growth, transit, walking, and biking. Further, the comment is not specific regarding which "impacts on regional planning" are being referred to. Within each resource chapter, where applicable, applicable regional planning documents are discussed, including their purpose and relation to the FCI Lands GPA. Within the Global Climate Change Section 2.15, Executive Orders S-3-05 and B-30-15 are both addressed; refer to subsection 2.15.2.2 and 2.15.3.1. See also Global Response 3 (GR-3)
L-36	The County's Climate Action Plan (CAP) was invalidated due to the absence of enforceable mechanisms to reduce GHG emissions. Yet, the CAP was an integral part of the General Plan. It is difficult to understand how or why the County would amend its General Plan via the GHG-intensive Project absent first knowing where it is going in terms of addressing climate change. Indeed, absent a valid CAP, it may not be legally permissible to amend the plan in such a major way.	The County acknowledges that its CAP was invalidated; however, overall, the proposed Project land use map has lower land use intensities than existing land use designations. While the comment asserts that the proposed Project is "GHG intensive", in fact, the existing land use designations allow for far more development as shown on Table 1-1A in Chapter 1 of the SEIR. The lower intensity of the proposed Project would reduce the subdivision capacity within the Project area by 8,849 lots, when compared to the existing land use designations (No Project alternative), [*see Draft SEIR, Chapter 1, Table 1-1C*]. The commenter refers to "the GHG-intensive Project"; however, no such Project alternative employs this nomenclature. A CAP is not required for the County to process discretionary or ministerial project applications. Further, the reference to illegality of processing general plan amendments due to the lack of an adopted CAP is unsubstantiated and the County is unaware of any law, policy or practice that precludes discretionary actions by the Board of Supervisors in the absence of a CAP.

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L-37	EHL therefore urges the County should adopt a legally valid revised CAP *prior to* the FCI Amendment. Otherwise, this GPA will face the twin burdens of 1) General Plan consistency when an important component of that plan – the CAP – is no longer valid and 2) providing alternative enforceable mechanisms for GHG reduction, as the invalidated CAP did not.	The County does not agree with delaying this Project until a CAP is adopted, as discussed in response to Comment L-36.
L-38	The Modified Project alternative is less intensive than the proposed Project and would result in less environmental impacts. This alternative would support build-out of approximately 4,521 residential dwelling units, or approximately 1,724 less than the proposed Project. (Table 4-4) When compared to the proposed Project, this alternative would primarily involve the re-designation of Semi-Rural lands (SR-10) and Rural lands (SR-20) to the lowest density rural land use designations allowed by the General Plan (SR-40 and SR-80), thereby increasing the amount of Rural lands by 2,952 acres as compared to the proposed Project. (Table 4-2)	The County agrees with the comment, which is not inconsistent with the analysis in the Draft SEIR. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine whether to approve the Proposed Project or an alternative to the Project.
L-39	CEQA outright prohibits the City from approving projects with significant environmental effects if there are feasible alternatives or mitigation measures that can "avoid or substantially lessen" those effects. (Pub. Resources Code § 21002.) This substantive mandate operates through a series of required findings that *must* be made and supported with credible, substantial evidence. Specifically, before the County may approve a project with significant environmental impacts, a lead agency must make two sets of findings under CEQA. The first must address how the agency responds to significant effects identified in the environmental review process, either by finding that these effects will be mitigated, or that "[s]pecific economic, legal, technological, or other considerations . . . make *infeasible* the mitigation measures *or project alternatives* identified in the final EIR." (CEQA Guidelines § 15091, subd. (a)(3).) The second set concerns any statement of overriding considerations, permitting an agency	This comment quotes specific provisions of the CEQA Guidelines, but is augmented with the commenter's interpretation of the cited guidelines; the County does not agree with all of these interpretations. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.

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	to approve a project despite the existence of significant environmental impacts. (CEQA Guidelines, § 15093.) Because the findings requirements implement CEQA's substantive mandate that public agencies refrain from approving projects with significant environmental impacts when there are feasible alternatives or mitigation measures that can lessen or avoid these impacts, an agency is prohibited from reaching the second set until it has properly addressed the first. (See CEQA Guidelines, § 15091, subd. (f), subd. (c); *Mountain Lion Foundation v. Fish & Game Commission* (1997) 16 Cal. 4th 105, 134.)[1] These findings must be supported by substantial evidence in the record. (Pub. Res. Code § 21081.5; CEQA Guidelines, § 15091, subd. (b).) Any finding that an alternative is infeasible must not only reflect a reasoned analysis, but must be based on specific and concrete evidence. For example, in *Citizens of Goleta Valley v. Board of Supervisors* (1988) 197 Cal.App.3d 1167, the court rejected a finding of infeasibility of alternatives based on conclusory assertions of unacceptable cost, noting that: "The fact that an alternative may be more expensive or less profitable is not sufficient to show that the alternative is financially infeasible. What is required is *evidence* that the additional costs or lost profitability are sufficiently severe as to render it impractical to proceed with the project." (Id. at p. 1181.) Only if this finding of infeasibility can properly be made may a lead agency rely on a statement of overriding considerations.	
L-40 and L-41	Here, as explained below, the Modified Project outperforms or is equal to the proposed Project or any of the other project alternatives considered in meeting every stated project objective, and no substantial evidence exists to support a finding of its infeasibility. Pub. Res. Code §21082.2(c) (Substantial evidence excludes "[a]rgument, speculation, unsubstantiated opinion or narrative, [and] evidence which is clearly inaccurate or erroneous…"); *see also Californians for Alternatives to Toxics v. Dept. of Food & Agric.* (2005) 136 Cal.App.4th 1, 17 ("[C]onclusory	These comments references a "Modified Project" alternative, which is the environmentally superior alternative for the Draft SEIR circulated for public review in 2013. There is not a Modified Project alternative in the Draft SEIR recirculated for public review in 2016. It is reasonable to assume the commenter is actually referencing the "Modified FCI Condition" alternative, which is the environmentally superior alternative for the Draft SEIR circulated for public review in 2016. These comments are an introduction to comments that follow. No further response is required.

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	statements do not fit the CEQA bill."). As is demonstrated below, the only alternative for which these required findings may be made is the environmentally superior, Modified Project alternative.	
L-42	The County in the SEIR has already acknowledged that the Modified Alternative would "decreas[e] environmental impacts in *all* issue areas evaluated." (SEIR at p. S-7, emphasis added.) It therefore cannot be subject to reasonable dispute that adoption of the Modified Project alternative would "substantially lessen" those impacts within the meaning of CEQA's substantive mandate. (See Pub. Resources Code § 21002; Guidelines §§ 15021(a)(2), 15126.6(b); (*City of Marina v. Bd. of Trustees of the California State Univ.* (2006) 39 Cal. 4th 341, 350.)	The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine whether to approve the Proposed Project or an alternative to the Project. See Responses to Comments L-3, L-4, L-40 and L-41. The Modified FCI Condition alternative was identified as the environmentally superior alternative, consistent with CEQA Guideline 15126.6. The SEIR is not intended to dispute adoption of the proposed Project or any of the alternatives. The SEIR has evaluated and disclosed the potential significant impacts of the proposed Project and alternatives, identified feasible mitigation and discloses those resources for which impacts would be considered significant and unavoidable. While the Modified FCI Condition alternative does reduce the severity of impacts when compared to the proposed Project, the resources for which an impact has been determined to be significant and unavoidable remains the same for each alternative, except for the No Project alternative which would result in additional resource areas having significant and immitigable impacts. See also, Global Response 1 (GR-1).
L-43	The Modified Project alternative would also more fully meet every stated Project objective and therefore more faithfully implement the adopted General Plan's Guiding Principles. The following discussion addresses each objective:	The determination of how an alternative satisfies or "more fully meets" a Project objective is at the discretion of the local agency; for the FCI Lands GPA the Board of Supervisors will make the determination of meeting Project objectives. See also, Global Response 1 (GR-1) and Responses to Comment L-3, L-4, L-40 through L-42.
L-44	The Project would contain 6,245 units at build-out. (Table 4-4) The Modified Project has 4,521 units. The reality is, however, that *none* of this growth is needed to accommodate regional population growth, because the Draft Map analyzed during the 2011 General Plan Update, which contains significantly less growth than the adopted general plan, *already* accommodated	The FCI lands were not included (provided land use designations) in the 2011 General Plan Update, although densities associated with the FCI lands were assumed (generally at 1:40 or 1:80) for overall General Plan implementation impact determination. The primary purpose of this Project (FCI Lands GPA) is to assign land use designations to the FCI lands that were not included in the General Plan

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	anticipated regional growth. Adding growth on top of this actually *undermines* General Plan objectives. EHL made this point persuasively in its comments on the PEIR for the Update. For this reason, the Modified Project actually outperforms the Project on this objective.	Update, consistent with the Project objectives and General Plan Guiding Principles. The comment correctly identifies the potential dwelling units at buildout of the proposed Project and the Modified FCI Condition alternative. The determination of whether or not an alternative satisfies, or outperforms another in fulfilling a Project objective is at the discretion of the local agency; for the FCI Lands GPA the Board of Supervisors will make the determination of meeting project objectives. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine whether to approve the Proposed Project or an alternative to the Project. See also, Global Response 1 (GR-1) and Responses to Comments L-40 and L-42.
L-45	"In a DPLU staff analysis of the ability of the Draft and Referral Maps to meet Plan Update objectives, planners concluded that the Draft Map fully met regional growth objectives, coming in slightly over the target population. (See *Land Use Scenario Comparison,* May 2004.) Maps significantly exceeding the population target, i.e., by 2 to 3%, were deemed inferior, since the additional growth in unincorporated areas was inconsistent with other planning objectives: "Scenarios within 2 to 3 percent of the County's target population are evaluated as "meeting" [the population] objective. Higher populations were not because additional capacity increases costs for both infrastructure and essential services." (See *Land Use Scenario Comparison,* May 2004, p. G-2, footnote.)	The comment is a footnote to Comment L-44, and is text taken from the General Plan Update FEIR, Volume III, Responses to Comments and represents EHL's comment G5-32. In the 2011 GPU FEIR, the County responded to this comment as follows: *The commenter refers to past staff analysis from a 2004 Board report. Fulfillment of the objective of "supporting a reasonable share of population growth" will be determined by the Board of Supervisors. ….. Additionally, it should be noted that the outcome of that 2004 Board hearing was the initial creation of the Referral Map (then referred to as the Consensus Alternative Map).* See also, Global Response 1 (GR-1).
L-46	According to County staff, "All Board Referrals scenarios [i.e., the proposed project] add unnecessary population capacity" and thus do *not* meet the goal of accommodating a *reasonable share* of growth**.** (See *Land Use Scenario Comparison,* May 2004, p. G-3.) For this reason, staff concluded in a May 2004 analysis that the "April 2004 Working Copy Map [precursor to the Draft Map] best meets GP2020 [Update] project objectives and the Board-	The comment is an additional footnote to Comment L-44, and is text taken from the General Plan Update FEIR, Volume III, Responses to Comments and represents EHL's comment G5-33. In the 2011 GPU FEIR, the County responded to this comment as follows: *The commenter again quotes past staff analysis. However, the Board of Supervisors will ultimately determine how the County can best meet its project objectives and will judge the adequacy of the project.*

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	endorsed planning concepts, Land Use Framework, and Draft Goals and Policies." (See *Land Use Scenario Comparison,* May 2004, p. G-3) **S**taff further noted that: "[a]ll Board referrals scenarios contain some residential designations that do not fit the proposed GP2020 planning principles. Including these exceptions could jeopardize the planning principles used to develop the GP2020 maps." (See *Land Use Scenario Comparison,* May 2004, p. G-2, footnote.)	See also, Global Response 1 (GR-1). No further response is required.
L-47	The SEIR acknowledges that by increasing densities (relative to the Modified Project) in remote forest in-holdings, the Project undermines this objective relative to the Modified Project.	See Response to Comment L-40 in regards to the "Modified Project" alternative. The County agrees that Project objectives strive to minimize development potential in remote forest in-holdings. However, in the Draft SEIR Chapter 4, Section 4.1.1 Alternatives Considered but Rejected, the County rejected the FCI Condition alternative because it assigned a rural density of one dwelling unit per 40 acres uniformly based on the assumption that all lands are remote forest in-holdings. In Section 4.1.1, FCI Density alternative, the analysis shows that this alternative would not be consistent with the Project objective to reinforce the vitality, local economy, and individual character of existing communities while balancing housing, employment, and recreational opportunities. The Board of Supervisors will consider the ability of the alternatives to meet the project's basic objectives and will make the required findings. The comment will be included in the administrative record that will be considered by the Board. See also, Global Response 1.
L-48	Both the Project and the Modified Project will increase the number of local residents who use local businesses. However, by adding excessive Village residential development in the community of Alpine, the Project will create mobility issues and thereby adversely impact the character and vitality of this local community. While the Modified Alternative that EHL supports does not have the expanded Village Residential and Commercial component of the Project, there is no showing that this addition will provide a net benefit to the existing community of Alpine. Even if it did, less impactful alternatives that would impede attainment of project objectives to some degree should not be	See Response to Comment L-40 in regards to the "Modified Project" alternative. The FCI Lands GPA intends to establish land use designations consistent with the Guiding Principles of the General Plan. Subsequent development consistent with the eventually adopted land use designations may generate additional residents in the future. The County does not agree that the proposed Project or alternatives represent excessive residential development potential and no rationale is presented to substantiate the claim. CEQA requires the disclosure of potential impacts and feasible means to lessen the severity of those impacts. CEQA does not require the determination of project benefits from proposed projects or alternatives. Moreover, the Modified FCI Condition alternative was not rejected as

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	rejected as infeasible. (Guidelines § 15126.6(b).)	infeasible as the comment suggests, and was presented as a Project alternative and analyzed as such within Chapter 4. See also, Global Response 1 (GR-1).
L-49	The SEIR acknowledges that the Project will further fragment and degrade the high habitat values of these remote and biologically intact in-holdings. The designations denser than 1:40 du/acre are particularly fragmenting to habitat, and the Project contains a much higher proportion of these land use designations in sensitive, remote areas relative to the Modified Project.	See Response to Comment L-40 in regards to the "Modified Project" alternative. The County agrees that densities of RL-40 or lower have less potential to fragment and degrade high habitat values of remote biologically intact in-holdings. As shown on Draft SEIR Chapter 4, Table 4-9, Biological Resources Impacts Comparison, the Modified FCI Condition alternative would potentially impact 10,432 acres of sensitive vegetation, which is 1,824 fewer acres than the proposed Project. Also see Global Response 1 (GR-1).
L-50	The critical natural hazard in the FCI areas is fire risk. By increasing the densities and number of units in these remote and rugged high-fuel areas relative to the Modified Project, the Project strongly undermines this goal on a relative basis.	See Response to Comment L-40 in regards to the "Modified Project" alternative. See Global Response 1 (GR-1). Also, see Global Response 2 (GR-2), the proposed Project and the alternatives do not propose an increase in density from the current land use designations.
L-51	While neither the Project nor the Modified Project provide land use configurations that support multi-modal transportation, the lower unit count of the Modified Project reduces the overall number of units in locations inaccessible to transit relative to the Project.	See Response to Comment L-40 in regards to the "Modified Project" alternative. The County agrees with this comment that the densities proposed by Modified FCI Condition alternative would not support multi-modal transportation. Both the proposed Project and Modified FCI Condition alternative reduce overall number of units in remote areas inaccessible to transit as compared to the existing condition (see Global Response 2).
L-52	Neither the Project nor the Modified Project provides land use configurations that reduce automobile trips. Both permit additional housing in far-flung locations distant from jobs and services. However, the lower unit count of the Modified Project compared to the Project reduces the overall number of units in locations that would generate long commutes and trip to distant services, thereby causing less GHG emissions on a relative basis. Largely but not exclusively due to Alpine, there are huge increases in VMT and resulting GHG emissions in the Project compared to the Modified Project. According to Tables 4-8 and 4-12, there are about *5 times* as much mobile source emissions in the Project versus the Modified Project, and about *5 times* the	See Response to Comment L-40 in regards to the "Modified Project" alternative. The County does not agree with the commenter's editorial characterizations that both alternatives "permit additional housing in far-flung locations distant from jobs and services" (see also Global Response 2 (GR-2)). However, the recital of information in Tables 4-8 and 4-12 is generally accurate. See Global Response 1 (GR-1). The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR.

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	amount of new average daily traffic generation (114,264 compared to 21,674).	
L-53	The former FCI lands contain little agricultural activity. To the extent that it does, however, the lower overall densities of the Modified Project relative to the Project will better preserve existing and future agricultural development opportunities.	See Response to Comment L-40 in regards to the "Modified Project" alternative. The County does not agree with this comment that the Modified FCI Condition alternative "will better preserve existing and future agriculture development opportunities." As shown in Draft SEIR Table 4-6, Comparison of Alternatives – County Identified Agricultural Lands and Impact Estimates, the number of acres of agricultural lands impacted by the Modified FCI Condition alternative is the same as those impacted by the proposed Project. See also Global Response 1 (GR-1).
L-54	Both the Project and the Modified Project would designate development in highly remote locations that are highly expensive to provide with infrastructure and emergency and other public services. However, the lower unit count of the Modified Project compared to the Project reduces the overall number of units requiring service and infrastructure in remote locations.	The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine whether to approve the Proposed Project or an alternative to the Project. See Response to Comment L-40 in regards to the "Modified Project" alternative. The County does not agree that both the Draft SEIR proposed Project and Modified FCI Condition alternative would designate development in highly remote locations. The proposed Project assigns 84% and the Modified FCI Condition assigns 89% of the acres associated with the Project areas with Rural Lands land use designations. This is substantially more than the 4% Rural Lands designations of the No Project alternative (see also, Global Response 2 (GR-2). In addition, new development at the Rural Lands densities allowed by the proposed Project for these remote locations would be scattered low density development that would not require the expansion of public infrastructure as the majority of residential units anticipated to be constructed within the Project areas are single-family homes capable of supplying their own potable water via private wells and addressing water needs on-site via alternative water treatment systems, i.e. septic.
L-55	The FCI GPA process is a continuation of the extensive public outreach process that resulted in the Update. While there are elements of the community and stakeholders in support of all the alternatives, it is important to remember that key stakeholders	The County agrees that the Project objectives of the General Plan, which are also the same for the FCI Lands GPA, are important to stakeholders and should guide the development of the FCI Lands GPA Project and alternatives. The comment does not raise an issue concerning the

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	(including EHL and the Forest Service) as well as members of the community throughout the county firmly believe in the Project objectives incorporated in the General Plan and wish to see them followed.	sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
L-56	While it is impossible to say definitively what the relevant community is, much less poll its feelings on the various alternatives, neither local landholders nor even a specific local community can conclusively represent the broader county public interest that should guide the County-wide General Plan process. The community and stakeholders are best served by even-handed and objective application of the General Plan Guiding Principles to specific areas and problems presented. For this reason, and because the Modified Alternative most closely adheres to the vast majority of these Principles, the Modified Alternative is the best expression of community and stakeholder interests considered as a whole.	The County agrees that determining the public interest is a never ending endeavor for all public agencies, but that is the mission of governance. The County appreciates the commenter's opinion regarding the Modified FCI Alternative. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. See also Response to Comments L-40 through L-42.
L-57	The 2011 General Plan assigned Rural densities in locations with high fire hazard, high habitat values, and/or lack of infrastructure and services. Exceptions to these Guiding Principles, Goals, and Policies occurred where existing parcelization precluded such Rural designations. Inconsistent with the practices of the 2011 General Plan, the Project – particularly but not exclusively in the hillsides of Alpine in AL 5, 6, 7, and 8 – assigns Semi-Rural or R-20 densities absent existing parcelization. Such mis-assignment treats parcels elsewhere in the County but with similar characteristics differently, creating inequities among property owners. The Modified Project is markedly superior in assigning Rural densities in a manner consistent with the Guiding Principles, Goals, and Policies of the adopted General Plan.	See Response to Comment L-40 in regards to the "Modified Project" alternative. The County agrees that the GPU generally assigned Rural Lands designations in areas with large parcel sizes that lack infrastructure and services, have a high habitat value and are located in a very high or high fire hazard area. Correspondingly, the Draft SEIR proposed Project assigns Rural Lands designations to portions of AL 7 and to all of AL 8. However, the Project objective derived from the Guiding Principles to avoid site constraints is not the only planning objective considered during the GPU or the FCI Lands GPA. All of the Project objectives found in Chapter 1 of the SEIR were considered when assigning land use designations in AL 5 and AL 6 under the proposed Project. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine whether to approve the Proposed Project or an alternative to the Project.
L-58	To take one specific policy example, reducing fire hazard was a prime determinant of general plan densities. LU-6.11 states,	The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the

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	"Protection from Wildfires and Unmitigable Hazards. Assign land uses and densities in a manner that minimizes development in extreme, very high and high fire threat areas or other unmitigable hazardous areas." The carpeting of extremely fire prone hillsides in Alpine – *with histories of multiple burns* – with Semi-Rural densities is a flagrant and inexcusable violation of the policy to minimize such inherently dangerous development. To the contrary, the Modified Alternative places appropriate Rural densities in these locations. Throughout the rest of the County, Rural densities were applied to high fire risk lands. The Project would create glaring and, indeed irresponsible, exceptions.	administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine whether to approve the Proposed Project or an alternative to the Project. See Response to Comment L-40 in regards to the "Modified Project" alternative. The County acknowledges that, as shown on Draft SEIR Figure 2.6-3, most of the Project area within the Alpine CPA is located within a very high fire hazard severity zone, as are the currently developed portions of Alpine (both Village and Semi-rural densities). The proposed Project attempts to balance the environmental issues noted in this comment with the need for future development in the Alpine community based on public comments received in response to the environmental analysis in the Draft SEIR circulated in 2013 and at public hearings.
L-59	The United States Forest Service, in its comment letters, clearly identifies densities higher than the lowest Rural categories as creating conflicts with Forest management. Higher densities of human use and associated roadways are directly related to fire starts, a grave threat to the Cleveland National Forest. Greater adjacent density causes more human intrusion with adverse effects on wildlife and greater management costs. Landscaping leads to invasive plant and animal species. The Modified Project follows Forest Service recommendations – particularly but not exclusively in Alpine – far more closely and minimizes conflicts relative to the Project and the other alternatives.	The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine whether to approve the Proposed Project or an alternative to the Project. See Response to Comment L-40 in regards to the "Modified Project" alternative. The County acknowledges these general concerns of the U.S. Forest Service about potential conflicts when increasing density adjacent to the Cleveland National Forest (CNF) lands. The County is not proposing to construct housing units in any Project area. Rather, the County is proposing to designate the former FCI lands consistent with the County's General Plan land use designations. Currently, the FCI lands have pre-FCI densities (1978 General Plan), which are considered too intense based on the County's 2011 General Plan Guiding Principles (see Global Response 2 (GR-2)). The County is proposing land use designations and densities based on existing land uses, environmental constraints and surrounding conditions.

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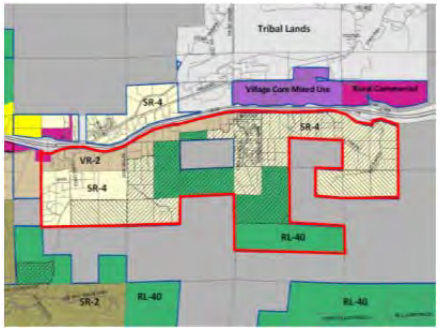
L-60	**The Alpine Alternative Is Similarly Flawed** In the Alpine Alternative, the linear Village is extended eastward as in the Project, but otherwise the Study Area of Alpine 5, 6, and 7 retains "existing General Plan" densities (Semi-Rural and Rural). Ultimate planning would await economic studies, although such economic factors should not be determinative. Also, for Alpine 8, a split designation of RL-40 and RL-20 is applied rather than the Project's uniform RL-20.	See Response to Comment L-40 in regards to the "Modified Project" alternative. This comment generally characterizes the Alpine Land Use Map alternative in Project areas east (AL-5,6,7) and south of the Alpine Village (AL-8). The Alpine Alternative Land Use Map alternative for AL-5,6,7) is shown outlined in red on Figure L-60, which is an excerpt from Draft SEIR Figure 4-3B. The Alpine Alternative Land Use Map alternative for AL-8) is shown outlined in red on Figure L-62B, which is an excerpt from Draft SEIR Figure 4-3A. (Please note that hatched areas on these figures show areas of difference with the proposed Project.)  **Figure L-60** The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine whether to approve the Proposed Project or an alternative to the Project.
L-61	For the same reasons described above, the lower densities of the Modified Project are both superior and feasible compared to the higher densities of the Alpine Alternative. Indeed, staff's own description of the constraints and hazards of these locations in its 2014 report to the Board of Supervisors – quoted below with emphasis added – paints a grim picture, particularly in terms of repeated wildfire conflagrations. Development at other than rural densities is the height of irresponsibility. *The southeastern parcels (AL-7) contain steep slopes that exceed 25% (refer to Figure 1 above). Very High and High Sensitivity Biological Habitat associated with wetlands and oak woodlands are located primarily in the southern portions of the area (refer to yellow and pink areas in Figure 3 above).* ***The entire area is located within the Very High Fire Hazard Severity Zone and contains some areas that have burned five or more times in the***	The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine whether to approve the Proposed Project or an alternative to the Project. The comment quotes text taken directly from the staff report for the June 25, 2014 Board of Supervisors hearing where the Board of Supervisors considered land use alternatives, which can be found on the Project web site (see page 3) at: http://www.sandiegocounty.gov/content/dam/sdc/dplu/advance/docs/FCI/bos/c.al0567analysis.pdf. With a few exceptions, the land use map endorsed by the Board of Supervisors at this hearing became the proposed Project for the Draft SEIR. The staff report will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.

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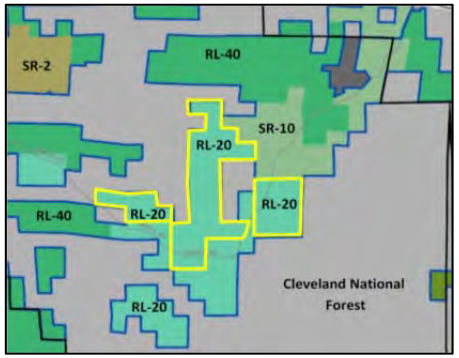
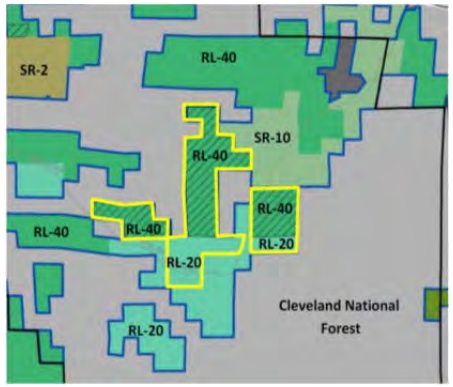
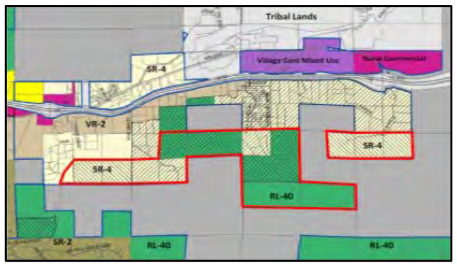
	past 90 years *(refer to Figure 4 above). In addition, the entire area is groundwater dependent with a five-acre minimum lot size per the County Groundwater Ordinance. Alpine AL-8 contains 23 parcels that range in size from 4.7 to 355 acres for a total of 1,748 acres. Currently, this area of consideration is sparsely developed with some agriculture and support structures. The area is located approximately 2.3 miles east of Loveland Reservoir along Japatul Valley Road and Japatul Road approximately 3.7 miles southwest of Interstate 8. AL-8 is outside of the County Water Authority boundary and surrounded by the Cleveland National Forest (CNF) in a federally-designated wilderness area. Portions of the area are constrained by steep slopes (refer to Figure-1). Also, approximately one-third of AL-8 is more than one-half mile from the nearest County maintained road (refer to Figure- 2). This area contains approximately 131 acres of High Value Biological Habitat (refer to Figure-3). Some properties contain farmland of local importance, grazing land and prime agricultural land.* ***Nearly all of the parcels are located within the Very High Fire Hazard Severity Zone with some areas of AL-8 burning up to four times in the past 90 years*** *(see Figure-4).*	

	Comment	Response to Comment
L-62	Regarding Alpine 8, due to fire hazard and other constraints, and consistent with the way similar areas in the 2011 Update were treated, these remote lands should all be designated at RL 40 or 80. The split designation in the Alpine Alternative, with 49 units, is a compromise only preferable by virtue of comparison with the Project, which contains 14 fully *double* the build-out units of the Modified Project (80 vs 40) in this area of extreme fire hazard.	This comment addresses the area in Alpine referred to as AL 8 in Attachment C of the June 25, 2014 Board of Supervisors staff report. This area is shown outlined in yellow on the Figures L-62A and L-62B taken from excerpts from the Draft SEIR Figure 1-2A (Proposed Project) and the Draft SEIR Figure 4-3A (Alpine Alternative Land Use Map alternative). The proposed Project assigns a RL-20 designation (one dwelling unit per 20 acres) to the entire area, which would result in a potential buildout of 81 dwelling units. The comment is correct that the Alpine Alternative Land Use Map alternative, which proposes a RL-40 designation (one dwelling unit per 40 acres) to the larger parcels and RL-20 to the smaller parcels accessible or in the close vicinity to Japatul Valley Road, would result in a potential buildout of 49 dwelling units.  **Figure L-62A: Proposed Project (AL-8)**  **Figure L-62B: Alpine Alternative (AL-8)** The Draft SEIR does not differentiate this area with a separate analysis; all Project areas are evaluated but do not have their own individual impact determination. The comment concerns the commenter's opinion on the merits of the Alpine Alternative and does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment, along with the June 25, 2014 staff report will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine whether to approve the Proposed Project or an alternative to the Project.

	Comment	Response to Comment
L-63	For Alpine 5, 6, and 7, there are two practical ways to reconcile, or significantly reconcile, environmental concerns that should be analyzed as alternatives in the SEIR: 1) Transfer of development rights: The enormous up-planning of the Village creates a unique and obvious opportunity for a *transfer of development rights program* within this finite and circumscribed area. Units outside of the Village in excess of Rural densities would be purchased by those obtaining the windfall of up-planning. The baseline for assigning transferable units would be the existing General Plan corrected for slope constraints.	This comment proposes the creation of a transfer of development rights (TDR) program which is not proposed within the FCI Lands GPA and is not an adopted program of the County. A TDR program was considered during the 2011 General Plan Update, but ultimately rejected by the County Board of Supervisors. The County provided the rationale why a transfer of development program was not feasible as part of the General Plan Update in Response to GPU EIR Comment G8-8. The County's response is available at: http://www.sandiegocounty.gov/content/dam/sdc/pds/gpupdate/docs/BOS_Aug2011/EIR/G3.04_Section_G_Interest_Group.pdf The comment also refers to "the existing General Plan" however, it is unclear which General Plan (2011 General Plan vs. the pre-FCI General Plan) is being referenced given the misinterpretation of the controlling land uses previously advanced within the comment letter. Please see Global Response 2 (GR-2). Consistent with the County's position on which land use designations currently apply to the FCI Lands GPA Project areas, land use designations consistent with the 2011 General Plan would first be established and subsequently a TDR program developed and implemented. However, as discussed above, the County Board of Supervisors recently rejected the concept of a TDR program for the County as infeasible. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project; however, offers no new information which would compel the Board to reconsider their determination.
L-64	2) Study Area boundary modification: *Shrinking* the proposed Study Area could minimize its most egregious flaws. Specifically, the Village and immediately adjacent areas would be retained for future study. However, the more remote, southerly portions – those most threatened by fire and those most important for National Forest land use compatibility – would be properly designated as Rural *at this time*. This option – called the Modified Alpine Alternative and further described below – is both superior and feasible from a CEQA perspective.	The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. The comment attempts to address an as yet funded study in the community of Alpine to further analyze the potential for increased development balanced with the costs of necessary infrastructure improvements and expansion, and site constraints such as slopes, fire hazards and biological resources. The Comment begins to formulate an alternative that was not considered and was not offered at the time (August 30 to September 28, 2012) the County provided the Notice of

	Comment	Response to Comment
		Preparation for this SEIR. The Minute Order within which the special study is directed the Board of Supervisors on June 25, 2014, can be viewed at: http://www.sandiegocounty.gov/content/dam/sdc/dplu/advance/docs/FCI/bos/fciminuteorder062514.pdf In this Minute Order, under Action 1.8, the Board: *Directed the Chief Administrative Officer to work with the Community Planning Group, U.S. Forest Service, and the property owners to develop boundaries for a special study area to determine the appropriate land use densities*; The Minute Order did not direct staff to analyze the special study boundary within the FCI Draft SEIR as suggested by the comment.
L-65	**Modified Alpine Alternative** The great majority of the Project's defects arise in Alpine, particularly in Alpine 5, 6, 7, and 8 where Semi-Rural densities are wrongly applied and where a Village expansion greatly increases vehicle trips and GHG emissions. The "Alpine Alternative" would "white hole" the non-Village part of Alpine 5, 6 and 7, retaining old General Plan densities pending infrastructure and service studies. Alpine 8 would revert to a "compromise" of densities advanced by the Planning Commission.	This comment contends that "Semi-Rural densities are wrongly applied" in Alpine, particularly in the areas referred to as AL-5,6,7 (see Response to Comment L-60) and AL-8 (see Response to Comment L-62) resulting in "Project's defects." The County does not agree with the comment's characterization of the proposed Project semi-rural densities in the Alpine Project areas because as shown in Figure L-62B, Rural Lands designations of RL-20 and RL-40 are assigned rather than Semi-Rural densities as the commenter asserts. It is unclear what "white hole" in the non-Village parts of Alpine means. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR, but provides the commenter's opinion on the merits of the Project. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
L-66	EHL suggests also considering a *variation* on the Alpine Alternative which corrects the worst mis-applications of Semi-Rural designations while, logically, leaving study options open for the Village and immediately adjacent locations. Lower Rural densities would be applied in the more southerly tiers of parcels, corresponding to those with greatest impacts on the Forest and those most distant from the Village. The Study Area would be retained for the Village location, immediately adjacent lands, and for already parcelized locations. In this way, the most severe	This comment proposes a variation on the Alpine Alternative Land Use Map alternative where a RL-40 designation would be assigned to the area outlined in red on Figure L-66, which is an excerpt from Draft SEIR Figure 4-3B. As shown on figure L-66, the Alpine Alternative Land Use Map alternative assigns a  **Figure L-66**

	Comment	Response to Comment
	Guiding Principles, Goals, and Policies inconsistencies would be remedied at this time, improving fire safety, Forest compatibility, and habitat values. Simultaneously, the areas most appropriate for Village expansion, and potentially for immediately adjacent Semi-Rural use, would remain for future study per prior Board direction. This option would retain the Alpine 8 compromise. An example of this variation is shown on the accompanying *Modified Alpine Alternative* exhibit, where the retained and reduced Study Area is hatched and appropriate Rural designations are applied to the southerly tiers of the original Study Area.	combination of RL-40 and SR-4, which reflect existing densities (No Project alternative). As shown on Draft SEIR Figure 1-2B, the proposed Project assigns a range of designations from Semi-Rural 2 (SR-2) through RL-40. Under CEQA Guidelines Section 15126.6(a), (c), an EIR need discuss only a range of reasonable alternatives. An EIR is not required to discuss every possible variation or proposal. The proposal also does not explain how it meets Project Objectives or reduce potential impacts identified by the proposed Project. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine the final land use designations for the Project.
L-67	While not as environmentally beneficial as the Modified Project, the Modified Alpine Alternative is nevertheless a pragmatic option that would allow the County to pursue planned future studies along a far more responsible – and CEQA-compliant – course than the original Alpine Alternative.	The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine the final land use designations for the Project. The comment characterizes its proposed alternative as a "pragmatic approach"; however, CEQA requires project alternatives to lessen the severity of identified impacts while also meeting the majority of project objectives.
L-68	**Conclusion** The above discussion demonstrates that the Modified Alternative not only substantially lessens virtually all the significant impacts of the Project and it better satisfies the overwhelming majority of Project objectives. It is well settled that "[i]f there are feasible alternatives or feasible mitigation measures that would accomplish *most* of the objectives of a project and substantially lessen the significant environmental effects of a project subject to CEQA, ***the project may not be approved without incorporating those measures***." (*Center for Biological Diversity, Inc. v. FPL Group, Inc.* (2008) 166 Cal.App.4th 1349, 1371 fn 19, emphasis added, [citation to Pub. Resources Code §§ 21000(g), 21002,	See Responses to Comments L-1 through L-67. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine whether to approve the Proposed Project or an alternative to the Project.

	Comment	Response to Comment
	Guidelines § 15091].) For this reason, CEQA requires adoption of the Modified alternative or something very closely resembling it.	

Responses to Comment Letter M
Sharon Haven (McCall)
February 25, 2016

	Comment	Response to Comment
M-1	I have been working with Ms. McCall for several years to find an avenue that would allow her to develop the historic cottages on her 4+ acre parcel into an Artist's Colony.	The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the record and will be considered by the decision maker. This comment is an introduction to comments that follow. The subject property, located in the Alpine Community Planning Area, is assessor parcel number 404-073-09.
M-2	She has owned the property since the late 70's, and her only recourse until now has been to rent them as residential units. The noise study she commissioned in 2013, done by Rick Tavares of ISE stated that "future noise would completely inundate the site and, in some cases, would exceed the 75-dBA "no residential build" standard. Given this, it is not unreasonable from an acoustical perspective to develop the site…as a commercial use, since uses of this type are typically classified as insensitive, or non sensitive to noise."	The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR, but concerns the commenter's preference for the proposed Project. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. The County agrees that noise levels of 75 community noise equivalent level (CNEL) or higher are not suitable for residential uses (refer to General Plan Noise Element, Table N-1). The SEIR also identifies mitigation to reduce noise impacts, as shown below. • Section 2.10.4.1 — General Plan Policies M-2.4: Roadway Noise Buffers, N-4.2: Traffic Calming, and mitigation Noi-1.4. • Section 2.10.4.3 — N-4.6: Road Improvement Projects and mitigation Noi-3.1.
M-3	Mrs. McCall would have greatly preferred the classification of Rural Commercial. However, she has been persuaded that the county will stand by its commitment to support the "special zoning designation" in SR-4 that will allow her to proceed with the development of her Colony. It is, and has always been, her intent to pass on the management of this unique piece of Willows history to her many nieces, who also testified at the Planning Commission as to the family interest in pursuing her dream.	This comment expresses the preference of the property owner for a Rural Commercial General Plan designation; however, the property owner has also indicated that zoning that would allow commercial uses in the existing buildings on the property would also be acceptable. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR, but concerns the commenter's preference for a specific zoning use regulation. The proposed Project and all Project alternatives assign a Semi-rural 4 (SR-4, one dwelling unit per four acres) to the subject property. In accordance with the Compatibility Matrix in Section 2050 of the County Zoning Ordinance, a Residential Commercial use regulation is compatible with the SR-4 designation under "special circumstances". Section 2072 of the Zoning Ordinance identifies findings that must be met in order to

	Comment	Response to Comment
		find that a use regulation is consistent under Special Circumstances. In November 2013, the Planning Commission recommended a Residential Commercial use regulation for this property, based on recommendations by staff that findings can be made to find the use consistent with the compatibility matrix. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
M-4	To the extent that the SEIR does not extend to the "special designation" zoning, I can only say that we look forward to hearing that that is a definite part of the presentation to the Board of Supervisors.	This comment reiterates that the "special designation" (Residential Commercial) be included when the Project is presented for consideration by the Board of Supervisors. The Form of Ordinance proposing zoning changes to the Board of Supervisors will include a Residential Commercial zoning use regulation for the subject parcel. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine the final zoning use regulations for the Project.

Responses to Comment Letter N
Sharon Haven (Borchard)
February 25, 2016

	Comment	Response to Comment
N-1	I must oppose the SEIR recommendation of RL-40 on these particular Japatul Valley lands. The property owners are not asking for anything outside the boundaries of the county's own regulations	This letter addresses the same area as Letters C, D and E where the proposed Project land use map assigns a RL-40 designation or one dwelling unit per 40 acres. The commenter is opposed to this designation. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine the final land use designations for the Project.
N-2	Criteria approved in the recent General Plan Update regarding "dead end roads" specifically allow 20 acre minimum to a distance of a mile from a county maintained road. All of these properties qualify under that ruling.	The comment that the General Plan Update "allows" a 20-acre minimum lot size when one mile from a County-maintained road is not correct. The General Plan does not include specific minimum dead-end road requirements. However, the County Consolidated Fire Code (see page 24) includes a table addressing zoning for parcels served by dead-end road roads. According to this table, for parcels zoned 20 acres or larger, the cumulative length of the allowable dead-end road is one mile. The County Consolidated Fire Code is available on the County web site at: http://www.sandiegocounty.gov/content/dam/sdc/dplu/docs/cosd-fire-code.pdf The 2014 Consolidated Fire Code is based upon the County's 2014 Fire Code as currently amended and adopted in Title 9, Division 6, Chapter 1 of the County Code, subject to the modifications of each fire protection district to the Building Standards Code based upon their respective determinations as to what modifications are reasonably necessary because of local climatic, geological and topographical conditions within the district. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR, but concerns the commenter's preference for a density for the area of one dwelling unit per 20 acres. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.

	Comment	Response to Comment
N-3	In addition, they are in close proximity, and in many cases adjacent to, homes on eight acres and less. The topography is gently rolling. There is plenty of water.	This comment identifies the vicinity of the area with parcels eight acres or less in size, the gentle topography and the abundance of water. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine the final land use designations for the Project.
N-4	Most importantly, we are not talking about a lot of homes. Mary Kay Borchard's property, under this scenario, would have a maximum of 2 more homes. The other owners would cumulatively gain no more than 6 homes over the span of nearly 200 acres.	The County agrees with the dwelling unit calculations in this comment. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine the final land use designations for the Project.
N-5	The impact to this area from the Sunrise Powerlink was devastating. Even now, its' towers loom over the top of the Borchard property. Rural blight in situations such as this is a significant problem. The inability to sell one's property for value adds to this situation.	The comment expresses concern over impacts from the Sunrise Powerlink, which traverses this area. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The Sunrise Powerlink project is not part of this Project and so is not analyzed in the SEIR. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
N-6	I strongly hope that you will reconsider your recommendation. I know that the property owners stand ready to entertain any suggestions you might have, even including restrictive measures and clustering to preserve more open space.	This comment requests consideration of a higher density than the one dwelling unit per 40 acres assigned by the proposed Project. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine whether to approve the Proposed Project or an alternative to the Project.

Responses to Comment Letter O
California Department of Fish and Wildlife
February 26, 2016

	Comment	Response to Comment
O-1	The California Department of Fish and Wildlife (Department) has reviewed the above referenced draft Supplemental Environmental impact Report (SEIR) for the Forest Conservation Initiative Lands General Plan Amendment (Proposed Project). The County requested comments on the SEIR by February 29, 2016. The following statements and comments have been prepared pursuant to the Department's authority as Trustee Agency with jurisdiction over natural resources affected by the project (California Environmental Quality Act, [CEQA) Guidelines § 15386) and pursuant to our authority as a Responsible Agency under CEQA Guidelines section 15381 over those aspects of the proposed project that come under the purview of the California Endangered Species Act (Fish and Game Code § 2050 *et seq.)* and Fish and Game Code section 1600 *et seq.* The Department also administers the Natural Community Conservation Planning (NCCP) program (Fish and Game Code§ 2800 *et seq.).* The County of San Diego (County) participates in the NCCP program by implementing its approved Multiple Species Conservation Program (MSCP) Subarea Plan (SAP), herein referred to as the South County MSCP (SCMSCP).	This comment is an introduction to comments that follow. No further response is required.
O-2	Many of the former Forest Conservation Initiative (FCI) lands are located within the County's draft North County and East County MSCP (NCMSCP and ECMSCP, respectively) planning areas, which are at various level of development and not yet adopted. According to the FCI lands General Plan Amendment (GPA) documentation provided, some lands within the Alpine Community Planning Area occur in the County's existing permitted SCMSCP planning area.	The comment correctly identifies that many of the Project areas are within the County's Draft North and East County MSCP planning areas, but these plans are not yet adopted. The comment further correctly identifies areas within the Project areas located in the community of Alpine as being with the Adopted South County MSCP. The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
O-3	The Proposed Project involves a GPA to the current San Diego County General Plan, based on the General Plan Update that was adopted on August 3, 2011. The proposed GPA would change the land use designations for approximately 71,700 acres of former FCI lands, which expired on December 31, 2010. The affected lands are comprised of	This comment reiterates information in the Draft SEIR Chapter 1 Project Description. The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.

	Comment	Response to Comment
	privately-owned lands in and around the Cleveland National Forest within County unincorporated community planning areas and subregional planning areas (e.g., Alpine, Central Mountain, Desert, Jamul/Dulzura, Julian, Mountain Empire, North Mountain, Pendleton/De Luz, and Ramona). Additionally, the Proposed Project involves changes in land use designations for approximately 400 acres of private lands adjacent to former FCI lands to ensure that the uses anticipated for these lands are consistent with the changes proposed for the former FCI lands. The GPA would include removing the FCI Appendix from the General Plan; amending the Alpine Community Plan; amending the Central Mountain, Jamul/Dulzura, and North Mountain Subregional Plans; and amending the County Zoning Ordinance with new zoning designations to ensure consistency with the GPA.	
O-4	The Department appreciates the County's draft responses to our prior March 18, 2013, draft SEIR comment letter which incorporated many of our recommendations for the Forest Conservation Initiative Lands General Plan Amendment. Revisions to the Proposed Project (as originally circulated in 2013) have prompted the County to recirculate the current SEIR document including revised land use designations, Community/Subregional Plan revisions, a revised General Plan Mobility Element, and cumulative effects analysis. According to the project description "t[T]he proposed Project tiers from the San Diego County General Plan and the General Plan Update Program EIR (PEIR) adopted on August 3, 2011 .... "	This comment reiterates information in the Project Description. The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
O-5	We offer the following comments and recommendations to assist the County in avoiding, minimizing, and adequately mitigating project-related impacts to biological resources, and ensure that the Proposed Project is consistent with the County's adopted South County MSCP and ongoing regional habitat conservation planning efforts:	This comment is an introduction to comments that follow. No further response is required.

	Comment	Response to Comment
O-6	1. The Department is concerned with aspects of the Proposed Project that may affect implementation and coverage of species under the adopted SCMSCP, and affect the ability to cover species in the future NCMSCP and ECMSCP.	The County appreciates this comment. No evidence, rationale or example is provided to support the concern about the ability of the County to process discretionary permit applications consistent with the provisions of the General Plan, Zoning Ordinance or the adopted South County MSCP. The County is not legally able to impose mitigation or conditions of approval on discretionary permit applications derived from draft, as yet adopted planning programs, such as the North County and East County MSCP. Regarding the South County MSCP, no evidence, rationale or example of projects previously approved that are inconsistent with the South County MSCP have been provided to substantiate the concern or indicate an inability of the County to process discretionary permit applications consistent with applicable planning documents and regulatory stipulations as is assumed within the analysis of biological impacts as discussed throughout section 2.4, Biological Resources of the Draft SEIR. See Response to Comment O-7.
O-7	Specifically, we are concerned with the potential for project-related increases in development densities to affect lands within the SCMSCP Pre-approved Mitigation Areas (PAMA), draft NCMSCP PAMA and in-progress ECMSCP Focused Conservation Areas (FCA).	The County does not agree with this comment, which specifically expresses concerns with Project-related increases in densities that affect lands within the SCMSCP Pre-approved Mitigation Areas (PAMA), Draft NCMSCP PAMA and in-progress ECMSCP Focused Conservation Areas (FCAs). As discussed in GR-2, the current land use designations on the FCI lands GPA allow for higher densities than the proposed Project. Also, Figures 2.4-2A and 2.4-2B have been amended to show in-progress ECMSCP FCAs and the estimated impact to vegetation. In addition, Table 2.4-3 has been added to the SEIR to identify the number of parcels and acreage for areas with further subdivision potential, as compared to parcels with no subdivision potential. As shown in this table, a total of 1,631 parcels (41,371 acres) within the Project areas are located within PAMA (SCMSCP or Draft NCMSCP) and FCA (in-process ECMSCP); however, only 67 parcels (12,547 acres) have additional subdivision potential. The table further shows that the parcels with additional subdivision potential would result in a potential level of impact ranging from 6.3% to 25.0%. As discussed above, the 25% level of impact reflects areas proposed for a RL-20 designation (one dwelling unit per 20 acres), the 12.5% level a RL-40 designation (one dwelling unit per 40 areas) and the 6.3% level a RL-80 designation (one dwelling unit per 80 acres). Therefore, only four parcels

	Comment	Response to Comment
		(836 acres) within the Project areas located within PAMA (SCMSCP or Draft NCMSCP) and FCA (in-process ECMSCP) would both be able to subdivide and have a higher density (RL-20) than the one dwelling unit per 40 acres analyzed in the 2011 General Plan FEIR. SEIR subsection 2.4.4.2 determined that the impacts from the Project to riparian habitat and other sensitive communities would be minimized by implementation of mitigation measures, but would remain significant and unavoidable. Likewise, SEIR subsection 2.4.4.4 determined that the impacts from the Project to wildlife corridors would also be significant and unavoidable. However, SEIR subsection 2.4.4.3 determined that impacts to federally-protected wetlands would be reduced to below a level of significance with implementation of applicable General Plan Policies and mitigation measures. See also Response to Comment O-6. The additional information is presented to address the comment's concern that the analysis was not sufficient to reveal potential impacts. However, the information above and provided in the referenced tables has not change the significance of identified potential impacts nor caused the creation of additional mitigation.
O-8	We are also concerned with project-related increases in densities that would occur adjacent to lands that have been conserved for MSCP or other biological purposes. According to the SEIR, "w[W]hile the General Plan EIR did not evaluate or consider the impact of adopting the General Plan land use element on the former FCI lands, it was prepared as a Program EIR." Therefore, the SCMSCP consistency analysis provided in the General Plan EIR evaluated FCI lands at a density of one dwelling per 40 acres, whereas the current SEIR appears to include some changes to the development densities within and adjacent to select SCMSCP open space and PAMA cases compared to the prior General Plan EIR. In areas where increased development is now proposed, it can potentially add strain on open space and conserved lands through direct and indirect impacts associated with various edge effects, including recreation use, trespass, and illegal dumping, and additional land management actions among other constraints.	The County appreciates the concerns expressed in this comment. Draft SEIR Figures 2.4-2A and 2.4-2B have been modified to show conserved lands. In addition, Table 2.4-4 has been added to the SEIR to identify the number and acreage of parcels that are adjacent to conserved lands, including Cleveland National Forest lands. This table segregates parcels that would allow subdivision from those where there is no further subdivision potential, based on the proposed land use designation. As shown in this table, there are 523 parcels (10,364 acres) within the Project areas that are located adjacent to conserved lands; however, only 35 parcels (2,628 acres) have additional subdivision potential. Table 2.4-4 further shows that these parcels with additional subdivision potential would result in a potential level of impact ranging from 6.3% to 100%. As discussed above, the 12.5% level of impact reflects areas proposed for a RL-40 designation and the 6.3% level a RL-80 designation. Therefore, only 22 parcels (298 acres) within the Project area are adjacent to conserved lands that would both be able to subdivide and would have a higher

	Comment	Response to Comment
		density than the one dwelling unit per 40 acres analyzed in the 2011 General Plan FEIR. The comment correctly identifies the difference between analysis of the 2011 General Plan EIR and the FCI Lands GPA SEIR; the proposed Project alternatives of the respective CEQA analysis do differ, hence the FCI SEIR supplements the information of the 2011 General Plan EIR to ensure the specifics of the FCI Lands GPA proposed Project is adequately analyzed. The potential for direct and indirect effects associated with 'edge effects' is analyzed within SEIR subsection 2.4.3.2 regarding riparian and other sensitive natural communities. Subsection 2.4.4.1 discusses how the General Plan land use policies and conservation policies address the potential impacts to biological resources caused by edge effects; mitigation measure Bio 1.7 specifically addresses potential impacts to biological resources caused by edge effects.
O-9	The final SEIR should clearly identify where the proposed project would change land use density or designations (either increase or decrease) within the adopted SCMSCP PAMA, draft NCMSCP PAMA, in-progress ECMSCP FCA and where it would occur adjacent to lands that have been conserved for MSCP or other biological purposes.	As discussed in Responses to Comments O-7 and O-8, SEIR Figures 2.4-2A and 2.4-2B identify estimated levels of impact to vegetation. A 12.5% impact level category has been added to these figures to more clearly show areas with a RL-40 or lower designation. Therefore, all areas with a 25% or higher level of impact would have a higher land use intensity than the RL-40 designation analyzed under the 2011 General Plan EIR. In addition, as discussed in Responses to Comments O-07 and O-08, SEIR Tables 2.4-3 and 2.4-4 have been added to further distinguish the number of parcels and acreage within the Project areas without additional subdivision potential, based on the land use designation. However, the existing densities analyzed in the Draft SEIR reflect the land use designations of the previous General Plan (1978) in effect before the FCI was enacted (see Global Response 2 (GR-2)). Current land use designations are reflected by the No Project alternative and are shown on SEIR Figures 4-3.1 through 4-3.13. SEIR Table 4-2 provides a comparison of land use distribution in acres showing that existing land use designations are predominately Semi-rural Residential (67,868 of 71,715 acres), as compared to the proposed Project, which is predominately designated Rural Lands (60,544 of 71,715 acres). The additional detail however, does not represent new information that would result in new or substantially increased significant impacts. This

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		information further clarifies the existing analysis. The SEIR concluded that impacts from the Project to riparian habitat and other sensitive communities would be minimized by implementation of mitigation measures, but would remain significant and unavoidable (SEIR subsection 2.4.4.2); impacts from the Project to wildlife corridors would also be significant and unavoidable (SEIR subsection 2.4.4.4); and impacts from the Project to federally-protected wetlands would be reduced to below a level of significance with implementation of applicable General Plan Policies and mitigation measures (SEIR subsection 2.4.4.3).
O-10	2. Figure 2.4-A depicts the boundaries of the adopted SCMSCP SAP planning area, draft NCMSCP, and in-progress ECMSCP plan areas in relationship to the FCI lands. However, this figure does not depict the locations of PAMA, Biological Resource Core Areas and designated wildlife corridors and linkage areas defined within the adopted SCMSCP.	Figures 2.5-1 through 2.5-13 have been added to the Final SEIR to show the information provided in Figures 2.4-2A and 2.4-2B in greater detail. In addition, these new figures also show the locations of Biological Resource Core areas, designated wildlife corridors and linkage areas, as well as PAMA. The additional detail however, does not represent new information that would change the results of the analysis which concluded that impacts from the Project to riparian habitat and other sensitive communities would be minimized by implementation of mitigation measures, but would remain significant and unavoidable (SEIR subsection 2.4.4.2); impacts from the Project to wildlife corridors would also be significant and unavoidable (SEIR subsection 2.4.4.4); impacts from the Project to federally-protected wetlands would be reduced to below a level of significance with implementation of applicable General Plan Policies and mitigation measures (SEIR subsection 2.4.4.3). Further, there is no need to require additional mitigation because the refined detail does not lead to new information that would change the significance or severity of the impacts than was previously identified and disclosed in the Draft SEIR, Section 2.4, subsections 2.4.3.1 through 2.4.3.6 and 2.4.4.1 through 2.4.4.6.
O-11	Additionally, the Department requests that the smaller-scale maps (e.g. Figure 1-2A and Figure 1-28) provide a similar comprehensive approach.	Refer to Response to Comment O-10.
O-12	The final SEIR should include the above MSCP-related information on Figure 2.4-A to support the analysis of where and to what degree the proposed FCI GPA changes to land use density	Refer to Response to Comment O-9, which discusses how Figures 2.4-2A and 2.4-2B have been amended to show an additional impact category to distinguish Project areas with higher intensity land uses than the RL-40

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	(especially increases) would result in direct or indirect impacts in the existing SCMSCP, draft NCMSCP, in-progress ECMSCP and to lands that have been conserved for MSCP or other biological purposes (see comment No. 1).	designation analyzed by the 2011 General Plan EIR. Refer also, to Response to Comment O-7 that discusses SEIR Table 2.4-3, which shows that only four parcels (836 acres) within the Project areas located within PAMA (SCMSCP or Draft NCMSCP) and FCA (in-process ECMSCP) would both be able to subdivide and have a higher density (RL-20) than the one dwelling unit per 40 acres analyzed in the 2011 General Plan FEIR. However, plans and regulations of draft documents cannot be specifically evaluated for potential impacts to implementation as they have not been adopted and do not have official status. The mitigation and polices that are proposed to address potential impacts of projects on adopted plans and regulations can be found within SEIR subsections 2.4.4.1 through 2.4.4.6.
O-13	3. In response to our request to identify the ongoing NCMSP and ECMSP planning efforts, the SEIR references the October 29, 2008 Planning Agreement (PA) which establishes a process to review interim development within the planning areas to achieve the preliminary conservation objectives and preserve options for establishing a viable reserve system or equivalent long-term conservation measures. The October 29, 2008 PA described in the draft SEIR expired and was renewed on May 16, 2014. The final SEIR should use the latest 2014 reference when discussing the NSCMSCP and ECMSCP PA.	As a result of this comment, the last paragraph of Draft SEIR Section 2.4.3.4, Wildlife Movement Corridors and Nursery Sites, has been revised to reflect the correct date of the Planning Agreement and to clarify the extent of the South County MSCP, as follows: The proposed Project's direct, indirect and cumulative impacts would be reduced by the same regulations, implementation programs (2011 General Plan goals/policies) and mitigation measures from the General Plan Update PEIR and repeated in Section 2.4.4.4 below. However, implementation of the mitigation measures listed in Section 2.4.4.4 would not reduce these impacts to below a level of significance. Implementation of the SCMSCP, County of San Diego ~~While the direct and cumulative impacts within the South County MSCP will be mitigated below a level of significance through implementation of the~~ Subarea Plan and the Biological Mitigation Ordinance will provide for mitigation of the direct and cumulative impacts within the Subarea Plan area (southwestern portion of the county). For the northwestern and eastern portions of the county, ~~the North County and East County~~ MSCP Plans have ~~are~~ not yet been adopted. As such, any contribution to the cumulative loss of wildlife corridors in the draft North and East County Plan areas would be cumulatively considerable, even after mitigation has been implemented for individual projects. It should be noted; however, that an interim

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		North and East County MSCP Planning Agreement (dated ~~October 29, 2008~~ May 16, 2014) is in place between the County, the CDFW, and the USFWS. Among other things, this agreement establishes a process to review interim development within the Planning Areas that will help achieve the preliminary conservation objectives and preserve options for establishing a viable reserve system or equivalent long-term conservation measures, but until those MSCP Plans are completed and approved, the proposed Project would result in significant and unavoidable direct, indirect and cumulative impacts on wildlife corridors and nursery sites. This correction does not alter the results of the impact analysis nor identify the need for new or additional mitigation.
O-14	We appreciate the opportunity to comment on the SEIR for the Proposed Project and to assist the County in further minimizing and mitigating project impacts to biological resources.	The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
O-15	The Department requests an opportunity to review and comment on any response that the County has to our comments and to receive notification to the forthcoming hearing date for this project (CEQA Guideline; §15073[e]).	The Draft Response to Comments from this letter will be provided to the California Department of Fish and Wildlife at least 10 days prior to certification of the SEIR, consistent with CEQA Guideline 15088 (b). The comment references CEQA Guideline 15073 (e) which pertains to the lead agency providing notice to public agencies that comment on a Negative Declaration or mitigated negative declaration of public hearings for the project. The document for which this comment was provided is an SEIR, not a negative or mitigated negative declaration; the cite is in error and does not apply to this circumstance. Also, Mr. Weiss's name has been added to the Project's outreach list for notification prior to Planning Commission and Board of Supervisor hearings.

Responses to Comment Letter P
Cindy Buxton
February 25, 2016

	Comment	Response to Comment
P-1	Thank you for the opportunity to comment on the County SEIR amendment addressing Forest Conservation Initiative lands.	This comment is an introduction to comments that follow. This comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision makers in evaluating the project.
P-2	The greater US Forest boundary which contains inholdings, is critical for the health of the forest which in turn is critical to the plants, animals, and health of the entire community of San Diegans.	The County of San Diego acknowledges and appreciates the comment. The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
P-3	Lands in the US Forest as well as actions that would impact the forest fall under the National Environmental Policy Act, (NEPA) as well as those private inholdings that additionally fall under the California Environmental Quality Act, (CEQA). These environmental laws require project planers to "take a hard look" at the information to make an informed decision.	The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
P-4	The county is required to base its decision using criteria from a viable climate action plan; but the county does not currently have a climate action plan in place.	The County does not agree with this comment that the decision for the Project cannot be made without a Climate Action Plan (CAP) in place. SEIR Section 2.15.3.2 provides the guidelines for determining significance for the purposes of evaluating the proposed Project for the County Board of Supervisors to use as a basis for decision making. Please see Global Response 3 (GR-3). The CAP is a program that establishes policies and quantifiable implementation measures to reduce local GHG emissions, improve air quality, and enhance livability, sustainability and resiliency. Once adopted, the County will implement the policies and measures contained in the CAP. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.

	Comment	Response to Comment
P-5	I would like to present the following points taking these issues into consideration: Because this is a US Forest Service boundary and this action applies to activities within that boundary; decisions there do not represent a weighted consideration upon community action; but must necessarily represent an action to preserve and protect the last remaining wild expanses of undisturbed *forest* that we have.	This comment appears to be a comment on the merits of the project but does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. It will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
P-6	The most critical place where this action must focus its efforts, is not at the center of a wilderness, miles into the interior; but *at* the forest boundary. Protection *must start* there if we are to insure that the wilderness within does not fall to more splintering and sprawl.	The comment advocates for "protection" at the forest boundary. The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
P-7	Currently the County does not have Climate Action Plan criteria upon which to gage their determination. This is a crucial factor. In 1993 the FCI was first established with overwhelming voter support. During the subsequent twenty-three *successful* years of operation, consideration of climate stabilization criteria has become both critical and required. Nevertheless the County has not incorporated this requirement into their decision.	This comment asserts that the "County does not have Climate Action Plan criteria" to make a determination on the Project. Refer to Response to Comment P-4, and Global Response 3 (GR-3).
P-8	In reviewing the video from the June 25, 2014 San Diego Board of Supervisors meeting we observed considerable meaningful testimony about the crucial role our forest plays in "providing a safe haven for species diversity, wilderness, solitude, *primitive* recreation, species refuge, and preserving the wild character of these lands." Specifically we observe very clear testimony from the US Forest Supervisor, William Metz, about these items and the critical role they additionally play in lands designated and recommended for full Congressional Wilderness status. Supervisor Metz specifically points out, that further subdividing these inholdings in the forest "puts the full viability of these wild and wilderness lands in jeopardy." I agree as did the over whelming majority of voters in 1993.	The comment, which discusses public testimony at the June 2014 Board of Supervisor's hearing on this project, does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
P-9	The community observed considerable testimony as to the value in limiting the urban to wild interface in its role in fire starts and the increased risk as well as expense, to life and property in placing more	The County agrees with this comment concerning the testimony at the June 2014 Board of Supervisors hearing. The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The

	Comment	Response to Comment
	humans in these areas.	comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
P-10	I emphasis as many others have the critical role our forests play in the health of the community, their role in the integrity of our watersheds, and the ecology of the lands, and in the stabilization of our climate, a goal required by state and federal law.	The comment, concerning the role a forest plays in the health of a community, does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
P-11	While NEPA requires a decision maker to take a hard look at the issues considering and disclosing all relevant information; when I review the live testimony on the Central Mountain areas by out Forest Supervisor, Mr. Metz literally did not make it back to his chair before a motion was on the floor to return the status of the CU-1 areas to RL40.	This comment is referring to an area in the Cuyamaca Sponsor Group Area (SGA) shown on Draft SEIR Figure 1-4 where, on June 25, 2014, the Board of Supervisors endorsed the Planning Commission recommendation (proposed Project and Alpine Alternative Land Use Map alternative) for combined RL-40 and RL-80 designation (one dwelling unit per 40 and 80 acres, respectively), which is either the same (RL-40) or a lower (RL-80) than the density allowed for this area under the Forest Conservation Initiative. However, the Mid-density and Modified FCI Condition alternatives propose for a RL-80 designation (one dwelling unit per 80 acres). The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis under CEQA. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
P-12	There followed a blissful attempt to have us believe that these areas were less remote and critical than the RL-80 designations to the immediate south. I beg to differ.	Refer to Response to Comment P-11. The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis, but instead offers the commenter's opinion concerning the merits of the project. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
P-13	While the county has not field checked these areas, I have, over the last twenty years both for myself and for numerous successful projects while representing the San Diego Sierra Club. This includes our support for the recent unprecedented decision to establish over 30,000 acres in recommended wilderness status. In this capacity I and consequently the Sierra Club San Diego has enjoyed one of the rare few, if not the most thorough field presences in the last two decades in these	Refer to Response to Comment P-11. The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.

	Comment	Response to Comment
	remaining remote, unspoiled corners of the Cleveland, photographing and videoing in these recommended wilderness areas, visiting them every month if not almost weekly. I support Mr. Metz's decision as one of the most courageous and even noted by Ryan Henson of CalWild, as one of the most unprecedented land mark wilderness decisions nationwide, for the sustained future of our wild lands in this region.	
P-14	This particular section of the forest, the county labels Central Mountain, laying adjacent to over 30,000 acres of recommended wilderness, within the boundary of the Cleveland National Forest, is one of the most critical, remote, least inhabited, and most threatened, of the entire forest, most sensitive to water issues as well as the most biodiverse. In fact it may well be the most uniquely biodiverse region in the county. Indeed the Kumeyaay word "Cuyamaca" means "*where the water comes from*".	This comment is referring to the Project areas shown on DRAFT SEIR Figure 1-3. The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
P-15	Clearly the apparent dismissal at the end of testimony for this area, was uncommon for this body as we have seen incredible and much appreciated support in the past. Just last spring Supervisor Jacob put a stop and facilitated a miraculous turnaround to severely damaging dirt dumping practices in the same area. Within two weeks four years and thousands of cubic yards of dirt washing into the watershed was finally halted on a proverbial dime thanks to her attentiveness to the issues.	The comment, which is again discussing occurrences at the June 25, 2014 hearing (refer to Response to P-11), does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Refer also to Response to Comment P-14.
P-16	Unfortunately this time by contrast, the reaction at the supervisor's meeting was shockingly devoid of the NEPA "hard look" at these issues, as well as general thoughtfulness to our Forest Supervisor's testimony. Obviously there could not have been time to even consider the very clear facts that were just presented by the Forest Supervisor himself in that meeting, over the validity of the emotional testimony of the land holders. They did not have time to verify the relationship of these speakers to the property as stated, moreover, while the only person in residence in the McCoy CU-1 section for the last decade and most in a thoughtful position to speak about these lands and 150 year history, was not present. Why did the other family members not ensure his testimony? Were they afraid that the one member that has known and cultivated a relationship with the land and 150 year history	This comment, which is referring to testimony by property owners or their representatives of lands within the Central Mountain/Cuyamaca SGA, does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.

	Comment	Response to Comment
	around him may want to see that legacy remain intact?	
P-17	I don't know but I see no clear reason or verification that this has been given sufficient review or consideration. Everyone wants a clear, easy, and final, swift answer. This is none of these. This one requires insight beyond math, physics, and economics of a physical world to at least some reasonable depth at the human ecumenical condition, courage, objectivity and foresight, -not selfishness.	The County does not agree that the area has not received sufficient review for the Board of Supervisors to make an informed decision. The Board has the analysis included in the SEIR to consider before making a final decision for the land use map for the Cuyamaca area. SEIR Chapter 1, Section 1.5.1 provides the Project area environmental setting and concludes the baseline conditions for the proposed Project are the same as those discussed in the General Plan Update PEIR. In addition, potential environmental effects are provided for resources identified in SEIR Section 1.1.3. Using one of these resources as an example, Section 2.4, Biology identifies the estimated impacts to vegetation (Figures 2.4-2A & B) and wetland impacts (Table 2.4-2 and Figures 2.4-3A & B). Also, SEIR Chapter 4 compares the impacts of each Project alternative to the proposed Project. Tables are included to compare these alternatives, such as Tables 4-1 Environmental Impacts; 4-2 and 4-3 Land Use Distribution in Acres; 4-4 Dwelling Units at Buildout; 4-5 Dwelling Units within Palomar and Mount Laguna Observatory Zone A at Buildout; 4-6 County Identified Agricultural Lands and Impact Estimates; 4-7 Proposed Land Uses in Forest Resources; 4-8 Area-Wide and Mobile Source Emissions Alternatives Comparison; 4-9 Biological Resources Impacts Comparison; 4-10 Proposed Land Use within Flood Areas; 4-11 Proposed Land Uses in Designated MRZ Area; and 4-12 Community-Level Forecast Average Daily Traffic (ADT) Generation. On June 25, 2014, the Board considered the land use map for the Project area lands within the Central Mountain Subregion, including the Cuyamaca Community Sponsor Group area. The Board-endorsed land use designations that were incorporated as part of the proposed Project land use map. At that hearing, the Board was provided with a staff report containing analysis of this area, along with public testimony from stakeholders. This analysis, identified as CU-1 in Attachment C to the staff report for the June 25, 2015 Board hearing is available on the Project web site at the address below. This staff report is included as part of the administrative report for this project. http://www.sandiegocounty.gov/content/dam/sdc/dplu/advance/docs

	Comment	Response to Comment
		/FCI/bos/c.cu1analysis.pdf
P-18	I diverge for a moment to say what should have been said long ago. Could the remaining heir and resident and his trusted colleagues living in the area, his wisdom and depth in understanding the components from the day by day facing them extend well beyond dollars and physical infrastructure? In my opinion, clearly and absolutely. From a 12 year history knowing him, Robert McCoy, his insight has been heartwarming, and enlightening, if not shockingly on point. He and his late and wonderful brother, David do not define life in terms that we could fully understand but to our historical record of our local society, they are invaluable and intrinsic. When I have looked at them and assured them that they are indeed the most important people in the forest, they looked back in humble, almost suspicious disbelief. But I've been there more than most and I can state categorically they are, and were. If nothing else they could use some time and elbow room. Not this outside malarkey, a contrived part of a contrived world reaching at them from down town, thrust upon theirs, living just next door to one of the most *UN-contrived* places in all of Southern California. They are disrespected via ignorance alone, so ignorant we think we are the ones in the know, in being pulled into a question using variables that were defined solely by the aggressor. We could only hope to speak their language. We have the same words; but I can assure you, we can't. Not only is the answers demanded where and when, not wanted nor appreciated, not even relevant to this remote world, I suspect there is no love for even defining this world by the *question* on outsider terms. Their genuiness and generousness did not recognize boundaries at all until recently, necessarily required to do so, with the sudden onslaught of hundreds of visitors into the area without warning or understanding.	The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
P-19	I feel for what the truly legacy old timers, tied too closely to the stereotype of "Duck Dynasty's" , Si Robinson, Si, himself a victim of the same in another part of the country, and with a heart and depth underneath, of William Faulkner for what truly matters when rarely	This comment is a personal assessment of property within an area referred to as CU-1 which is within the proposed Project areas, and does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record

	Comment	Response to Comment
	allowed, without bias, to express themselves, what they have had to reconcile with the thousands descending upon a waterfall recently and discovering natural beauty for the first time. What a paradox! You cannot address this question fairly or accurately until you take the time, diligence and courage, if not your own vulnerability lain upon the ground before you, to understand its components. No one in government is doing this, but to date I have my bets that when and if it comes; it will be the diligence of individuals within the USFS that go the distance. In many, many ways our legacy locals from the McCoy Ranch have been far more patient with the rest of us over the years, and more patient than many of us in the middle have been with the masses, suddenly showing up at their door step, far more respectful for far longer than clearly we have been with prejudging and demanding of them. They are far set apart than the average land investor, or even the modern guy, well meaning, and wanting to get a little piece of land away from it all. They ARE history in the live, and one of the last remaining links we have to an accurate view of the past. Careful what you seek… In my opinion the best you could do is suspend the question permanently for the foreseeable future and leave them alone. We gain volumes in the long run. They are a long lost treasure.	that will be considered by the decision-makers in evaluating the Project.
P-20	We look in horror at the legacy of our past upon the Native American Indian but then we fail to see our last remaining legacy ranches for the living history that remains and become as despicable in assuming we know beyond our old timers today as we were in severing all ties to the Native wisdom of the past. WE are the real losers in lost knowledge, in perpetuity, for it. We have so fallen out of scale in seeing this phenomenon for what it is and for what it represents it is mind blowing. The human condition is its own worst enemy once again. It's not too late to reconsider. This is a place where the question itself needs some very serious realigning, it is way too presumptuous in the context of this geographical apex.	The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.

	Comment	Response to Comment
P-21	To assume and proclaim on a dime without inspection or some time there, that it is the lessor end of the Central Mountain section you define, is almost shocking. This IS the CENTRAL MOUNTAIN, it is THE apex of the San Diego backcountry physically *and ecumenically*. It lies geographically in the center nestled up under Cuyamaca the 2nd highest mountain in the county escaping the top honors at Hot Springs by only 60 feet; but clearly far more known every day from every sky line in the county. I feel for the people but I feel even more for the endurance of the integrity of the land. We should think long and hard, and carefully, before we decide we should, or are even entitled, to divide and conquer. After all we only dished up two deserts: subdivide by 40 or 80? What if we don't want desert?	The County appreciates the environmental significance of the lands within the Cuyamaca Sponsor Group Area and adjacent Central Mountain Subregion. As shown on SEIR Figures 1-3 and 1-4, in recognition of these remote lands, the proposed Project assigns Rural Lands land use designations of either RL-40 (one dwelling unit per 40 acres) or RL-80 (one dwelling unit per 80 acres), which allow the lowest potential development available for privately-owned lands. Table 1-1C has been added to SEIR Section 1.2.1 to show the potential number of new lots that would result under both the existing land use designations (No Project alternative) and the proposed Project designations. As shown in this Table, the proposed Project would substantially reduce the number of potential new lots, when compared to the existing land use designations. Below is a summary showing the potential number of new lots from Table 1-1C for Cuyamaca and Central Mountain. • Cuyamaca – 28 (proposed Project) and 210 (No Project alternative) • Central Mountain – 12 (proposed Project) and 1,034 (No Project alternative) While Table 1-1C provides additional details regarding the proposed land use designations, the information does not change the impact determinations or require additional mitigation.
P-22	What is the answer? I'm not sure; but I am sure we did not take a "hard look" and we do not have a good one yet. The numbers attempting to descend and force action by their own terms often even without checking in with the US Forest Service, here for any number of projects, is shocking; and the manner in which they attempted to do it, appalling. I've watched them all every step of it. Thanks to our Forest Supervisor it still has a chance to be spared heart break. But sorry, not the family members you saw give testimony, not the county, not even I, nor the Forest Service has the answers; but I think the latter two has at least acknowledged that much that we need to provide this particular corner a lot more grace and time until WE mature to a point that we act appropriately.	The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.

	Comment	Response to Comment
P-23	You have not begun to try to understand this area and that is what I object to more than anything. Because a place is not forest it suddenly becomes your jurisdiction and you suddenly know everything. You don't. When the residence of the Central Mountain area needed medical care who came, the County? Nope. It was members who cared and acted withing the US Forest Service. Who is at least paying attention? It wasn't the county. I caught red handed the county trying to turn the whole region into a giant wind farm and worse I caught them trying to NOT tell the Forest Supervisor. That alone gives me great pause about the county credentials to be making decisions here. I caught the county roads lying about their dirt dumping and storage and grading practices, --all too easily proven in the internet era with Google Earth's history function.	This comment calls to question the County's capacity to appropriately evaluate this area but does not present information that was not analyzed, considered and used in developing the proposed Project or Project alternatives. The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
P-24	Again, I do appreciate that there are a few like Ms. Jacobs that step up and mean well, but the integration to the county government as a whole and my faith in them to take the extra mile for the intrinsic and ecumenically "San Diego" for perpetuity, is just not there, yet. This is within the bounds of the US Forest Service and that interface needs to demonstrate far more agility in working together.	The comment suggests the County work together with the U.S. Forest Service (USFS). The County has coordinated with USFS staff throughout the entire planning process for this Project. Examples of this coordination are provided below. • County staff met with or participated in conference calls with USFS staff in September 2012, September 2013 and August 2015. • USFS staff provided comments on the SEIR Notice of Preparation in September 2012 and then on the 2013 Draft SEIR in March 2013. These comments were considered by County staff when developing the staff recommendation to both the Planning Commission in October 2013 and Board of Supervisors in June 2014. • USFS staff sent a letter to the County Board of Supervisors prior to the June 2014 hearing.
P-25	I think we should impose nothing until we think about what we could lose for a lack of not getting out of our own way and that impact to all of time to come and to losing all of time that has come. This is, at its core a philosophical question. –and those can be messy until clarity is at last earned and achieved. It will come, but it takes time and we should not destroy all in the process.	The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.

	Comment	Response to Comment
P-26	That would go as well for other pressures upon that living legacy that merely want to demand their right to divide it up for profit. I cannot stand in the shoes of one that has ties so clearly to what I've read only in history books; but I have spent enough time in and around the area to know that we have not accurately defined this situation and a rash decision on things we don't understand would separate us from valuable truths from the past forever at the demise of our own ignorance and arrogance to think we know it all without ever going there, much less living it.	The County does not agree with this comment, which asserts that the issues in this area have not been sufficiently defined. Refer to Response to Comment P-17. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
P-27	I'm afraid to admit it but I will. I would not divide these properties at all. They are a living history. That perspective crumbles the moment it is divided --Compensate the losses of those that must have their family share and be done with it. We created this situation a hundred years ago and that much still comes at a huge bargain for the rest of us. If we are to evolve appropriately we must do that much. Pay the trust their gold but leave the legacy alone. It is a drop in the bucket compared to the resource and the cost of losing it.	This comment advocates for compensating property owners in exchange for their ability to subdivide their property. A similar program for agricultural lands is already in place—see Purchase of Agricultural Conservation Easements Program at: http://www.sandiegocounty.gov/content/sdc/pds/advance/PACE.html The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
P-28	We certainly have for good reason to the American Indian, why would these not carry a similar responsibility? Accommodate the family ability to be there, generationally; but to remove it without acknowledging its place both historically and environmentally would be a big mistake.	The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
P-29	At the end of the day, that is what subdividing does, does it not? I know it; you know it, and at least some of our living legacy knows it, those that think in deep and broad terms about the land and its connections, all too painfully well. Some in these families know exactly what I mean, some won't.	The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
P-30	So don't subdivide **at all** , it was our mistake as a society in allowing without insight in the first place, but **do** compensate the fringe on the trust; and be done with it and let the land live on.	This comment advocates the County compensate property owners for a loss in their ability to subdivide their property. Refer to Response to Comment P-27. The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.

	Comment	Response to Comment
P-31	These are difficult questions but those in residence do not gaff off the sanctity of the natural history over their living conditions. They've given up plenty in the modern world to ensure the integrity of their birthright. They deserve recognition and acknowledgment certainly at least by contrived modern day planners. Forcing the divide and conquer plan is hardly fair. This needs something else; yet so far, no one has a good idea. That does not mean replace no plan with a bad one. IN the interim, leave it alone. Their depth if one actually takes the time to listen rivals William Faulkner. Their focus is a totally different league of banking where their sense of currency lies well outside the nuts and bolts of this decision trust upon them by an outside modern government. These ranches were in place before California was even a state, nor were there local or state taxes demanded of them to pay for things they never asked for, but little by little the land shrivels for thrusting monetary tribute in property taxes upon them.	The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
P-32	I doubt seriously they had the benefit of fair accounting or effective legal counsel in the process. It is something to consider many times over.	The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
P-33	If it weren't for their hanging on, rich in beauty, poor in dollars, for being one of the few to discern and choose the difference accordingly, our back country would be a series of tasteless, emotionless, type converted grasslands, timeshares, and industrial energy projects with freeways connecting them. Instead they are some of the richest in diversity and unspoiled beauty and habitat we have. However if you want a 'black and white" answer to the upper Central Mountain section I'll provide a hefty place to start...In my opinion this is in the direction of the right thing to do: My plan costs money; but that is all. It could be much worse and much more expensive.	This comment is an introduction to comments that follow. The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
P-34	I would entitle the entire 160 acre McCoy Ranch to Robert Allen McCoy, the last "real McCoy", so to speak, to manage in full and to designate in legacy as he defines. He is the one that selflessly understands it, lives and nurtures it, studies its history, savors it day by	This comment is in regard to an individual property owner and their affinity for the property discussed. The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be

	Comment	Response to Comment
	day and preserves its legacy and still finds ample love for his family to share and learn from its history. It was clear from the testimony of his brother the late David McCoy that his only desire and real intention in life was to share this beauty with his family. David was poor beyond comprehension in dollars but rich more than most San Diegans know in the beauty he knew every day from the "real" San Diego. That was the unrelenting and uncommon choice he made, as has his brother. They deserve the respect of the community for the respect they have given the land. I quote even Supervisor Jacob in her comment, "thanks to the McCoys for all they have given San Diego" at the last meeting on this issue.	considered by the decision-makers in evaluating the Project.
P-35	Dividing and conquering this apex of the geography and historical crossroads of the county is not going to preserve this dream. Therefore the solution is to NOT divide at all, keep the real and proven trustee of the land, Robert McCoy in the dream that is his birthright, then for the others on the trust, pay them the fair market share of their inheritance now without further talk of subdividing and be done with it. Provide the family with a continued ability to be present on the family ranch as their late father had wanted, without its subdivision within the forest boundary. The county created this controversy and pushed it upon the oldest ranch in the area, the county could pay and it would be a bargain to lay this to rest once and for all. Mr. McCoy is not going to disallow his family's presence upon their family ranch; but he will and does treasure and recognize that legacy in its whole.	The comment asserts a solution to the dissolution of a family trust in order to prevent the property's subdivision. The County does not agree that it "created this controversy and pushed it upon the oldest ranch in the area". The proposed Project would retain the current density of one dwelling unit per 40 acres, the density allowed under the FCI. Therefore, there is no new or additional ability to subdivide the property under current or proposed conditions. The comment does not raise an issue concerning the sufficiency of the analysis in the SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
P-36	If it were possible I would include the full worth of the Green property, -- if Green could be adequately compensated, and rejoin to include all 300 acres of the original McCoy Ranch. That is the right thing to do, ecumenically. It is a unique situation underscores its existence before statehood. It deserves a thoughtful resolution, if possible without our barbaric intrusion further upon a private property and the county taking the responsibility to provide it. This solution endures the legacy and satisfies the financial woes of its inheritors, while preserving the integrity of its juxtaposition in the forest. That would answer once and for all the question of subdivision for this ranch and this issue.	See Response to Comment P-30. The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.

	Comment	Response to Comment
P-37	The only other property in like kind to this issue is the Marston Ranch to the immediate north east of the McCoy Ranch, which should be granted similar solution if and when the time comes. However its owners are not the legacy locals that have the unique issues of the McCoy Ranch. The county, essentially the public can pay for the course of history in putting things right. Otherwise we can spend another 20 years coming up with a better one that will be far more expensive in the long run. How much have we spent already on this? Fair? Much fairer than the debate before us now. It is a win-win. A similar solution should prevail for any other large legacy ranch inside the forest boundary. They should not be subdivided at all at the demise of forest and history; but their heirs should be compensated ***and*** allowed to have a presence on an undivided family owned parcel without further pawing at their property.	See Response to Comment P-30. The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
P-38	Just what does intact mean from the outside looking in and where are our boundaries to intrude? We may not be in a position to answer but I think that clearly these variables need more time and they need to be put into the context of the bigger picture. That picture now includes required CAP criteria as well as a long long voter recognized validity of our National Forest Boundary and autonomy of the US Forest Service to manage its lands under NEPA.	The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
P-39	While we too cherish the living historical legacy of these hundred and fifty year old ranches I fail to grasp how that cherished living legacy 10 would be favored by subdividing and redevelopment over this historical living legend in its current juxtaposition to the Forest in keeping it whole. That rare living legacy, remains a valuable resource in of itself, and unique and precious living glimpse of the past, also threatened side by side with natural resources there and in the adjacent Federal Forest.	The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.

	Comment	Response to Comment
P-40	Therefore I resolve that the County of San Diego: 1. MUST NOT evaluate the conditions of this region until they have legally acceptable Climate Action Plan criteria with which to do so. 2. Additionally these criteria must protect our Forest Wilderness and watershed as critical components of a valid climate action plan as well as critical to the health of the forest ecology, and of our community.	The proposed Project and alternatives are evaluated for impacts to global climate change consistent with the significance criteria described in SEIR Section 2.15, specifically subsections 2.15.3.1 and 2.15.3.2. A Climate Action Plan is not necessary to evaluate and disclose potential impacts of the proposed Project and Project alternatives on global climate change. Refer to Global Response 3 (GR-3).
P-41	3. This decision should not be based on grandfathering old habits and political visibility; but on solid and scientific information that preserves our forests and the forest boundary in perpetuity.	The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
P-42	4. The county MUST respect the concerns of the US Forest Service in restricting further subdivisions, development, and management within the Cleveland National Forest, particularly next to wilderness, recommended wilderness, and anywhere within the US Forest greater boundary, where Forest resources, especially those protected by wilderness, such as water, habitat, critical species, critical and unique ecologies such as those in all of those the critical Central Mountain region, *quiet* untrammeled character and scenic integrity, could be compromised by more human activities such as a reduction in the protections by the FCI and *any OTHER* upcoming county proposals within the Forest Boundary.	The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
P-43	5. I would like to reference the concurrent comments by the Cleveland National Forest Foundation (CNFF) on this issue and recognize their suggestions to create a "forest" designator overlay district that would apply to all lands regardless of parcel size within the FCI planning area. I quote "New development can and should be accommodated inside the Village designated areas so that open space and forest land values can be preserved." I agree.	See Response to CNFF Comment T-6. The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
P-44	IN Conclusion: -Please do not accept less than the most environmentally stringent options for this effort. - Please DO respect the guidance of the US Forest Service within the greater Forest Boundary.	This comment provides concluding remarks. The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.

Responses to Comment Letter Q
League of Women Voters
February 29, 2016

	Comment	Response to Comment
Q-1	The League of Women Voters supports principles of compact growth, enforcement of fire-safe development, and identifying and safeguarding valuable agricultural land, a limited but renewable resource. We promote conservation and preservation of critical natural resources, including habitat, open space and farmland. Our Land Use position supports minimizing urban sprawl and maintaining established patterns of growth and community identity within an area by allowing self-determination in community planning and decision making. We review major development projects which have regional impacts, including environmental analysis, for consistency with the comprehensive plan and regional infrastructure plan. Land use decisions should relate to and protect the overall quality of the environment while minimizing additional motor vehicle traffic.	This comment identifies the general planning principles supported by the commenter. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
Q-2	When the 2003 Cedar fire and the 2007 fires ravaged San Diego County, we knew that the back country would never be the same in our lifetime. Now, we are faced with another looming disaster—a man-made disaster. If the County allows increased density and leapfrog development in our last remaining wilderness area, then the diversity of wildlife in the county will be in jeopardy. Key wildlife corridors will be fragmented. At least 20 plant and animal species will be at risk of extinction.	This comment expresses opposition to increased density and leapfrog development in the remaining wilderness areas. The County does not agree that the Project would allow increased density and leapfrog development in wilderness areas. The wilderness areas of the Cleveland National Forest are managed by the U.S. Forest Service, are outside the Project area and the County's land use authority and are not available for development. In addition, Table 1-1C has been added to the SEIR to compare, in addition to full buildout, the number of additional lots that could be created through subdivision of both the proposed Project and existing land use designations. As shown in this table, 2,470 additional lots could be created with buildout of the proposed Project, as compared to 11,287 net lots that could be created under existing land use designations. See also Global Response 2 (GR-2). The addition of this table does not change the analysis of the Draft SEIR, merely provides additional clarification of the development potential of the proposed Project when compared to existing land use designations.

	Comment	Response to Comment
		The comment provides the commenter's opinion about the impacts of the project and will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
Q-3	We need zoning regulations that prevent a substantial increase in density. Based on our LWV principles, the proposed auto-based sprawl development consisting of thousands of new housing units in our national forest is unacceptable. Areas, such as Alpine, would suffer from inappropriate subdivision into residential estates rather than preserving its rural characteristics and qualities.	This comment expresses opposition to "proposed auto-based sprawl development" in the Alpine Community Planning Area (CPA). The County disagrees with the characterization in this comment as the proposed land use designations would expand an existing village and include an area allowing for mixed use development patterns. In addition, the comment does not include subdivisions within the Cleveland National Forest. As detailed in Section 2.1, Aesthetics, the construction of future buildings, infrastructure, or other improvements within the Project areas addressed in this SEIR would have the potential to adversely affect the unique character in some of the County's CPAs and Subregions. As the types and character of these visual resources vary throughout the unincorporated County, some proposed land use designations would result in increased development densities in certain rural areas that could in turn adversely affect or degrade the existing visual character or quality of a community due to: incompatibility, substantial change to community character, or alteration or loss of a community's visual resources. As such, implementation of the proposed Project would result in significant and unavoidable direct and cumulative impacts related to visual character or quality. The Board of Supervisors will consider this significant and unavoidable impact when considering whether to approve or deny the project and the project would also a Statement of Overriding Considerations. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
Q-4	Please retain the integrity of the General Plan by preventing the subdivision of intact habitat, farmland and our watershed. These subdivisions would burden taxpayers with the costs of providing services and roads to distant areas while endangering more properties and citizens with limited water supplies, inevitable wildfires, and greenhouse gas emissions.	This comment expressed an opposition to the subdivision of intact habitat, farmland and watershed and new development that burdens taxpayers with the cost of providing services; however, does not propose alternative land use designations. As discussed in Response to Comment Q-2, the proposed Project would substantially reduce development potential when compared to existing land use

	Comment	Response to Comment
		designations. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine whether to approve the proposed Project or an alternative to the Project.
Q-5	Your draft SEIR identifies significant environmental impacts associated with wildfire hazards, biological resources, air quality, aesthetics, agricultural resources, traffic & transportation, hydrology & water quality, mineral resources, noise and utilities. These impacts concern us.	This comment recognizes that the Draft SEIR identified significant environmental impacts. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine the final land use designations for the Project.
Q-6	The League of Women Voters of San Diego County urges you to abide by the minimum 40-acre parcel limit established by the Forest Conservation Initiative, which two-thirds of the voters overwhelming passed over 20 years ago. Furthermore, please adhere to the principles and guidelines of the recently adopted General Plan and prevent auto-based sprawl. Please protect what remains of our Cleveland National Forest.	This comment urges the County to abide by the 40-acre minimum parcel size established by the Forest Conservation Initiative. The County disagrees with applying a blanket 40-acre minimum parcel size throughout the Project area. This was an alternative considered but rejected in the Draft SEIR, as discussed in Chapter 4, Section 4.1.1 Alternatives Considered but Rejected (pages 4-7 through 4-13) because applying a 1:40 development density over all of the former FCI lands would not be consistent with the Guiding Principles and Land Use Goals and Policies, including the Community Development Model. However, under the proposed Project over 43 percent of the Project area acreage is assigned a lower density (one dwelling unit per 80 acres) and over 35 percent the same density of the FCI (refer to the table on page 4-7 in Section SEIR 4.1.1). The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine the final land use designations for the Project.

Responses to Comment Letter R
United States Forest Service
February 29, 2016

	Comment	Response to Comment
R-1	The Cleveland National Forest appreciates the opportunity to comment on the potential impacts of the proposed General Plan Amendment for the former Forest Conservation Initiative (FCI) lands. We also appreciate the consideration given to our input by San Diego County Supervisors and staff throughout this process, including the designation of a Special Study Area in Eastern Alpine. The Forest's comments herein include comments previously submitted during the scoping period, as well as comments on both the initial and re-circulated Draft Supplemental Environmental Impact Reports (SEIRs).	The comment provides introductory statements. The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
R-2	Altogether, we remain concerned about the potential environmental and public health and safety impacts that would be associated with increases in population density on former FCI lands, and we find that these impacts are neither adequately disclosed in the Draft SEIR nor consistent with the objectives of the County of San Diego General Plan.	The County does not agree that impacts were not adequately disclosed. SEIR subsection 2.2.4.4 determined that even with implementation of applicable General Plan policies and mitigation measures, any direct conversion of forestry resources due to private development of parcels within the Project areas would remain significant and unavoidable. In addition, SEIR Executive Summary Table S-2 provides a summary of all impacts and mitigation measures. As disclosed in the description of the No Project alternative of the SEIR Chapter 4, and analyzed in subsection 4.5, on December 31, 2010 the land use designations of the FCI lands (Project areas) reverted back to pre-Forest Conservation Initiative (FCI) General Plan designations (1978) in accordance with the language in the Initiative. Therefore, current permissible land use densities on FCI lands are higher than densities assigned in the proposed Project; the land use densities of the No Project alternative are higher than the densities in effect during the life of the FCI. The Project analyzed in the Draft SEIR did not use either the current densities (pre- FCI General Plan designations) or the densities of the FCI as a baseline. Rather, the Draft SEIR analyzed the impacts of the proposed Project in comparison to existing physical conditions. Please refer to Global Response 2 (GR-2).

	Comment	Response to Comment
R-3	Our review of the re-circulated Draft SEIR has revealed that no responses were provided to our comments on the initial Draft SEIR, nor did they result in changes to the analysis.	The comment noted the recirculated Draft SEIR does not contain responses to comments on the Draft SEIR circulated in 2013. Consistent with CEQA Guidelines section 15088.5(f)(1): "When an EIR is substantially revised and the entire document is recirculated, the lead agency may require reviewers to submit new comments and**,** in such cases, need not respond to those comments received during the earlier circulation period. The lead agency shall advise reviewers, either in the text of the revised EIR or by an attachment to the revised EIR, that although part of the administrative record, the previous comments do not require a written response in the final EIR, and that new comments must be submitted for the revised EIR. The lead agency need only respond to those comments submitted in response to the recirculated revised EIR." The requirement to resubmit comments is addressed in the Recirculation Readers Guide in the first paragraph of the Summary of Revisions section. The Recirculation Readers Guide is available on the Project web site at: http://www.sandiegocounty.gov/content/dam/sdc/pds/advance/FCI2016/0.0%20Readers%20Guide.pdf Additionally, the Readers Guide immediately followed the Table of Contents and preceded the Executive Summary of the SEIR and further described within the Notice of Availability which provided notice to the general public, Responsible and Trustee Agencies as well as members of the public that had previously commented or requested specific notification.
R-4	It is also worth noting that the areas of the Cleveland National Forest proposed for recommended wilderness status at the time of our previous comments were granted this highest level of agency protection in October 2014.	The County appreciates the information that the areas noted as recommended for Wilderness status in the 2013 USFS comments have been granted this status. The Wilderness status information was included in staff's analysis to both the Planning Commission and Board of Supervisors when developing the proposed Project land use map and the Mid-density and Modified FCI Condition alternatives and are therefore represented as part of the existing environmental conditions (baseline conditions) from which the proposed Project was analyzed. The planning reports to the Planning Commission and Board of

	Comment	Response to Comment
		Supervisor are included in the Administrative Record for the Project. In addition, this comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
R-5	We find that the best way to protect both the environment and public health and safety in the vicinity of the FCI lands, including the Cleveland National Forest, would be to select the Environmentally Superior Modified FCI Condition Alternative.	The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis, but provides the commenter's opinion and preference for the Modified FCI alternative. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
R-6	In addition, we request provisions that development on private lands will not rely on the Cleveland National Forest for infrastructure or vegetation management needs and that impacts to the Cleveland National Forest from such development will be avoided, minimized, or mitigated.	The comment "request(s) provisions that development on private lands will not rely on the Cleveland National Forest (CNF) for infrastructure or vegetation management needs". The ability to permit infrastructure installation or vegetation management activities on CNF Lands managed by the U.S. Forest Service (USFS) is wholly within the discretion of the USFS and not the County of San Diego. See Global Response 5 (GR-5).
R-7	We will begin by highlighting key issues and management challenges related to urbanization that were described in detail in our 2005 Forest Land Management Plan. These issues are common to all former FCI lands and are central to the potential environmental and public health and safety issues associated with increasing population density within and adjacent to the Cleveland National Forest. Next, issues particular to specific mapped areas of the plan are addressed. Finally, comments specific to the SEIR are addressed at the end of this letter.	This comment is an introduction to comments that follow. Comments R7 through R24 generally describe the issues that USFS manages and the general direct and indirect effects of population growth adjacent to USFS-managed lands. These comments do not specifically refer to the DEIR or the substantive analysis contained within it. It should be noted that, generally, the proposed Project would not result in an increase in population adjacent to USFS-managed lands. Even if the Project were not to be approved as proposed, FCI lands would still be able to be developed by property owners under the existing General Plan designations, and these types of effects may have the potential to occur. However, the proposed Project sets forth a programmatic framework compatible with the 2011 General Plan Update that future discretionary projects shall be required to comply with. The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
R-8	The rapidly increasing population of Southern California, the growing level of development adjacent to the Cleveland National Forest, and the resulting effects on the National Forest System (NFS) lands present	The comment, which identifies USFS challenges when managing the CNF, does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative

	Comment	Response to Comment
	some of our main management challenges.	record that will be considered by the decision-makers in evaluating the Project.
R-9	Higher density development in more remote areas leads to more Wildland/Urban Interface area that is at risk of and in need of protection from wildland fire. The combination of increased development and the need to protect these developed areas from fire and other natural events, such as flooding, will put increasing pressure on National Forest managers to alter landscape character to accommodate these uses. In the case of fire, suppression efforts to protect communities can lead to the buildup of fuels and eventually to higher severity, more damaging fires than would occur naturally. Furthermore, increasing the number of homes in an area increases the likelihood of human-caused fires, which can increase fire frequency to levels that harm ecosystems, wildlife, and waterways.	The County appreciates the comment that increased development within the Wildland/Urban Interface puts increased pressure on USFS managers. Draft SEIR subsection 2.6.3.7 identifies the Project area acreage within the Wildland Urban Interface and determined that 86% of those lands are assigned Rural Lands designations. The Draft SEIR determined the proposed Project would result in significant and unavoidable direct and cumulative impacts related to wildland fires. The proposed Project would not increase homes within the WUI when compared to existing General Plan designations. Lower densities are proposed for assignment in the proposed Project and the Project alternatives as compared to existing land use designation s (No Project alternative).
R-10	Finally, we have concerns about the potential difficulty of evacuating people from remote subdivisions when wildland fires occur nearby on the Cleveland National Forest.	The County shares the USFS concerns of the potential difficulty of evacuating people from remote subdivisions when wildland fires occur. Consistent with the concern, lower densities are proposed for assignment in the proposed Project and the Project alternatives as compared to the No Project alternative, as discussed in Response to Comment R-9. The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
R-11	Urban development also puts pressure on public lands to provide urban support facilities (i.e. infrastructure) through special-use authorizations as private land options for development are exhausted. In the past, subdivisions have been established with the expectation that adjacent National Forest land can accommodate necessary water tanks, utilities, and defensible space to protect homes from wildfire. Instead, we now request that private lands be required to serve these purposes for future subdivisions through the blanket incorporation of self-sufficiency for new development projects on FCI lands.	This comment addresses the USFS concerns with providing urban support facilities for subdivision in the CNF. See Response R-6 and Global Response 5 (GR-5).

	Comment	Response to Comment
R-12	Along the same lines, where water delivery systems are not in place, the installation of wells for household use will lower the groundwater table beneath adjacent NFS lands, thereby degrading habitats for native plant and animal species. To avoid these impacts, we request that water delivery systems be established before enabling increased density on former FCI lands.	The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR; however a response has been provided below to respond to the concerns of the USFS. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. The County appreciates this comment that groundwater-dependent land uses may negatively impact groundwater resources of adjacent CNF lands, as analyzed in SEIR subsection 2.7.3.2. The potential significant impacts on groundwater supplies and recharge resulting from implementation of the proposed Project would be reduced by the same regulations, implementation programs and mitigation measures from the General Plan Update PEIR and repeated in subsection 2.7.4.2 (Mitigation for Groundwater Supplies and Recharge) within the FCI Lands GPA SEIR. The comment does not provide new information that would alter the analysis, impact determination or proposed mitigation for this issue of groundwater. Any future development that is dependent on groundwater will be subject to the County Groundwater Ordinance, which establishes regulations for the protection, preservation, and maintenance of groundwater.
R-13	Road access presents several primary issues associated with increasing population density within or adjacent to the National Forest. The narrow, winding National Forest road system was built in the 1930s to support fire protection and does not meet typical County access standards. Moreover, the greater the population density of an area, the wider a suitable road would need to be. The National Forest roads generally lack rights-of-way where they cross private lands, which would need to be obtained in order to widen them or convey utilities.	The County appreciates the USFS's concern over a lack of access and right-of-way to expand access for areas within or adjacent to the CNF. Please refer to Response to Comments R-06 and R-09 and Global Response 5 (GR-5). The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
R-14	Furthermore, any improvements to Forest or County roads on the National Forest would require substantial planning and environmental compliance to be borne by project proponents, if permitted.	The County acknowledges that the cost of improving roads through CNF lands would be borne by project applicants. See Global Response 5 (GR-5) This issue is not related to an environmental issue pursuant to CEQA.
R-15	Widening roads, building new roads, and increasing traffic to accommodate increasing population density in remote County areas would negatively impact plants and animals in a variety of ways, including direct mortality and habitat loss and fragmentation, and	See Global Response 5 (GR-5) Potential significant impacts related to biological resources and hydrology are analyzed in Section 2.4 and 2.7, respectively, in the Draft SEIR.

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	would also increase erosion and sedimentation of waterways.	
R-16	Increased interface between developed private lands and National Forest boundaries also increases boundary management challenges including addressing occupancy trespass, clearly posting boundaries, and retaining clear title to NFS land. For example, in re-marking forest boundary after the 2007 fires, we discovered major encroachments adjacent to some subdivisions.	The County appreciates the comment and recognizes that development adjacent to CNF lands can create encroachment issues. Generally, the proposed Project assigns lower densities in these areas. SEIR subsection 2.2.3.4 Direct and Indirect Loss or Conversion of Forestry Resources, recognized that impacts could occur from development adjacent to CNF lands and that the Project would have the potential to result in significant indirect impacts. See also Response to Comment O-08 concerning Table 2.4-4 being added to the SEIR showing the number and acreage of parcels that are adjacent to conserved lands, including CNF lands. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
R-17	Another challenge associated with urbanization is the complex problem of National Forest access. For example, traditional points of public and administrative access to the National Forest have been lost as private land is subdivided.	This comment raises an issue concerning a loss of traditional points of access to the CNF as private lands are subdivided. The lack of formal agreements or easements with private land owners that results in the loss of administrative access to CNF lands is not within the purview of the FCI Lands GPA and is not related to an environmental issue pursuant to CEQA. The County of San Diego does not enforce or determine prescriptive rights to access across private or public land. Traditional points of access may, in some circumstances, represent a trespass situation and not reflect a legal means of ingress/egress into the CNF.

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R-18	New landowners are often reluctant to accommodate access across their land. At the same time, residents living adjacent to the National Forests want convenient access, often resulting in the development of unplanned roads and trails.	The County appreciates the comment, which raises the issue that increased development adjacent to the CNF increases impacts from unauthorized uses (see Response to Comment R-16). Encroachment issues are analyzed in SEIR subsection 2.2.3.4, which determined that the proposed Project would potentially result in significant and unavoidable impacts. In addition, the Draft SEIR determined that all alternatives would potentially result in significant and unavoidable impacts due to unauthorized uses (see SEIR subsections 4.2.2.2; 4.3.2.2; 4.4.2.2). The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
R-19	Unauthorized motorized vehicle use occurs and tends to be more of a management challenge on National Forest lands near private developments. As an example, illegal motor vehicle use of the Pacific Crest Trail has been reported from the Lake Morena area in the midst of the federally designated Hauser Wilderness.	The County appreciates the concerns raised with unauthorized motorized vehicle uses, particularly in the Lake Morena area. However, the area adjacent to the Hauser Wilderness area is adjacent to the Lake Morena Rural Village, which is already developed and the proposed Project would allow very little future development. As shown in the Draft SEIR on Figure 1-9, the proposed Project assigns a Rural Lands 20 (RL-20, one dwelling unit per 20 acres) to lands within the Project area adjacent to this area. As shown in SEIR Table 4-4, buildout of the proposed Project in Lake Morena would allow a total of 49 dwelling units, which is 282 units less than allowed under the existing land use designations; one additional dwelling unit than would be allowed by the Modified FCI Condition alternative. Table 1-1C has been added to SEIR subsection 1.2.1 to show how many additional lots would be allowed through subdivision with buildout of the proposed Project. Table 1-1C shows that the subdivision potential of the proposed Project would allow eleven additional lots in the 1,562 acre Project area encompassing the Lake Morena/Campo Sponsor Group Area. The additional detail provided in the modified tables does not result in additional or more severe impacts than disclosed in the Draft SIER; therefore, additional or new mitigation is also not necessary.

	Comment	Response to Comment
R-20	Population growth within and surrounding the National Forests will probably be the single largest impact on National Forest recreation management in the foreseeable future. This growth has pushed urban development closer to and within the National Forest, in some cases directly adjacent to National Forest boundaries. Where NFS lands are or will be the boundary to this development, there will be pressure on these adjacent lands to provide diverse kinds of recreation. Higher density development would be expected to increase this pressure.	This comment raises the issue that development adjacent to CNF lands increases the pressure to provide diverse kinds of recreation on CNF lands. Impacts to recreation facilities are analyzed within subsection 2.12 of the SEIR. The provision of diverse recreational opportunities is consistent with the CNF Management Plan. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
R-21	Recreation on the National Forest is managed according to Recreation Opportunity Spectrum (ROS) to provide choices for people to recreate in settings that vary from urban to primitive. In general, the Forest Service would prefer zoning on adjacent private lands to be complementary with the land use zone and ROS on the NFS land. For example, where there is interface between private lands and NFS lands within a designated or recommended wilderness area or Inventoried Roadless Area, lower density County zoning would be the more complementary. Solitude, an increasingly rare opportunity, is a desirable feature in wilderness, but would be difficult or impossible to retain in the face of the increasing population and higher density development.	The County appreciates this comment. As discussed in response to Comment R-4, the Wilderness status information was included in staff's analysis when developing the proposed Project land use map and was included as a baseline condition from which the analysis begins. As shown in SEIR Table 1-1B, 62,694 of 71,715 acres (87%) within the Project area are assigned either Rural Lands designations or are open space, public or tribal lands. The comment lacks specificity regarding County land use designations with those of the ROS in terms of compatible categories beyond the assertion that the lowest residential densities should be planned adjacent to wilderness areas. Moreover, the comment relates to potential impacts to areas outside of the Project areas and control of the County, e.g. CNF lands. No evidence is provided that incompatible land uses are proposed within the proposed Project or Project alternatives; nor how land use and ROS category compatibility would lessen the identified impacts disclosed in the SEIR. Table 1-1C has been added to SEIR subsection 1.2.1 to show how the proposed Project would reduce the number of new lots that would be allowed through subdivision, as compared to existing land designations. Table 1-1C shows that the subdivision potential of the proposed Project would allow 2,395 new lots, which is substantially fewer than the 11,212 additional lots that would result from buildout of existing land use designations. See Global Response 2 (GR-2).

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R-22	Extensive habitat conservation planning efforts led by local government and conservation organizations have identified the need to maintain an inter-connected network of undeveloped areas or landscape linkages, which retain specific habitats and allow for maintenance of biodiversity and wildlife movement across the landscape and led to development of several multi-species habitat conservation plans. National Forest System lands are a core element of this natural open space network and will play an increasingly important role as additional habitat fragmentation occurs on surrounding private lands.	This comment discusses the need to maintain an inter-connected network of undeveloped areas or landscape linkages, which is consistent with the existing content of the Draft SEIR. Impacts to wildlife movement corridors is analyzed in SEIR subsection 2.4.3.4 and feasible mitigation is identified in subsection 2.4.4 Mitigation. Specifically, mitigation measures Bio-1.1 through Bio-1.7, Bio-2.3 and General Plan Policies COS-1.1 through COS-1.5, LU-6.1 and LU-6.7 address the need to maintain habitat corridors and linkages.
R-23	Fragmentation is the breaking up of contiguous blocks of habitat by urban development features into progressively smaller patches that are increasingly isolated from one another and of less value for conservation. Higher density zoning allows for a higher level of development and, accordingly, fragmentation. Habitat loss and fragmentation are the leading causes of species extinctions, and the Cleveland National Forest has many populations of federally-listed threatened and endangered species that could be affected by increasing population density on former FCI lands.	The County appreciates the comment that higher density zoning may ultimately lead to habitat fragmentation. Please refer to Global Response 2 (GR-2) and the discussion of how the proposed Project land use densities are generally lower than existing land use densities. SEIR subsection 2.4.3.2 discusses how indirect effects resulting from development near CNF and MSCP preserves may result in habitat fragmentation. The impact of habitat fragmentation is analyzed in SEIR subsections 2.4.3.1 and 2.4.3.2, and feasible mitigation is identified in subsection 2.4.4 Mitigation. Specifically mitigation measures Bio-1.1 through Bio-1.7 and General Plan Policies COS-1.3, COS-1.6 through COS-1.11, COS-2.1, COS-2.2, LU-6.1 through LU-6.4, LU-6.6, LU-6.7 and LU-10.2 address potential impacts to special status species and mitigation measures Bio-1.1 through Bio-1.7, Bio-2.1 through Bio-2.4 and General Plan Policies COS-1.3, COS-1.6 through COS-1.11, COS-2.1, COS-2.2, COS-3.1, LU-6.1 through LU-6.4, LU-6.6, LU-6.7, LU-10.2 address the potential impacts caused by habitat fragmentation.
R-24	Meanwhile, invasive species generally enter new areas through human activity in those areas, and so increasing population density would result in the introduction of new infestations that would damage Forest resources and be costly to manage.	The County appreciates the comment that invasive species enter into new areas through human activity. Potential impacts caused by invasive species are analyzed in SEIR subsections 2.4.3.1 and 2.4.3.2, and feasible mitigation is identified in subsection 2.4.4 Mitigation. Specifically mitigation measures Bio-1.1 through Bio-1.7and General Plan Policies COS-1.3, COS-1.6 through COS-1.11, COS-2.1, COS-2.2, LU-6.1 through LU-6.4, LU-6.6, LU-6.7, LU-10.2address potential impacts invasive species impacts to special status species and mitigation measures Bio-1.1

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		through Bio-1.7, Bio-2.1 through Bio-2.4 and General Plan Policies COS-1.3, COS-1.6 through COS-1.11, COS-2.1, COS-2.2, COS-3.1, LU-6.1 through LU-6.4, LU-6.6, LU-6.7, LU-10.2 address the potential impacts caused by invasive species.
R-25	**Alpine Community Planning Area (CPA).** The Forest is concerned about the density increases proposed for areas at the eastern end of Alpine, both south and north of Interstate 8. Road and water systems should be planned before enabling such increases, and the severe risk of fires in this area should be addressed.	The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Comments R-25 through R-38 are related to the USFS's preference with regards to land use designations of the proposed Project and do not specifically relate to the substantive analysis within the Draft SEIR. However, the County appreciates the commenter's input. The comment raises concerns for density increase in the Alpine CPA. The highest density adjacent to the CNF is SR-1 (one dwelling per acre). This density will enable the minimum 100 feet of defensible space specified in the June 20, 2014 USFS letter to the Board of Supervisors. Generally, densities are much lower and would enable even larger areas to establish defensible spaces. The SEIR is a Program EIR and thus does not specifically analyze site-specific issues; rather, it intends to set a framework for future development that is compatible with the General Plan Policies and Guiding Principles. The County agrees that road and water systems, along with high fire risk, should be addressed prior to development in the eastern end Alpine CPA, both north and south of Interstate 8. The Program EIR sets forth the framework that shall occur prior to development in these areas, including existing regulations applicable to development projects. Development regulations, such as the County Consolidate Fire Code and agreement to serve letters from water districts would ensure these concerns have been accounted for. This issue is not at variance with the existing content of the Draft SEIR. In addition, the Draft SEIR identified policies and mitigation measures that address these issues, as shown in the SEIR subsections shown below. • 2.6.4 — Policies LU-6.11, M-1.2, S-3.1 through S-3.4, S-3.6, S-4.1 and mitigation measures Haz-3.3 and Haz-4.1 through Haz-4.4.

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		• 2.13.4 — Policies LU-5.5, LU-9.8, LU-12.2, M-1.2 M-1.3, M-2.1 through M-2.3, M-3.1 through M-3.3, M-4.2 through M-4.5, M-8.6, S-3.5 and mitigation measures Tra-1.3 and Tra-4.1. • 2.14.4 — Policies LU-8.2, LU-13.2, COS-4.1 and COS-5.5 and mitigation measures USS-2.1 through USS-2.3, USS-4.3 and USS-4.7.
R-26	In addition, Viejas Mountain was designated a Critical Biological Area of the National Forest by our Land Management Plan due to its unique botanical resources.	The County appreciates the comment that Viejas Mountain was designated a Critical Biological Area. The proposed Project assigns a Semi-Rural 10 (SR-10, one dwelling unit per ten acres) to the privately-owned lands adjacent to Viejas Mountain (see area in northeastern portion of Figure 1-2B of the Draft SEIR, Chapter 1 Project Description). This density will not allow any further subdivision for these parcels. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine whether to approve the proposed Project or an alternative to the Project.
R-27	The Modified FCI Condition Alternative would best prevent the environmental and public health and safety impacts described above.	The comment notes the commenter's preference for the Modified FCI Condition alternative. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine whether to approve the proposed Project or an alternative to the Project; however, at discussed in Response to Comment R-26, no further subdivision would be allowed in this area by either the proposed Project or Modified FCI Condition alternative.
R-28	More detailed information about these and other concerns are available in an attached letter to the County Board of Supervisors dated June 20, 2014.	The attached letter, dated June 20, 2014, was sent to the County Board of Supervisors prior to the June 25, 2014 hearing. The County has reviewed this letter and incorporated relevant information, when applicable. (See Response to Comment R-25). The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.

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R-29	**Jamul CPA – Skye Valley Ranch.** The Forest would recommend continuing the RL-80zoning on these parcels. The bridge over Pine Creek near Barrett Honor Camp is insufficient for any traffic, even in an emergency, and will not be improved or replaced since it falls within the Pine Creek Wilderness. Additionally, these parcels border twoexisting federally designated wilderness areas (Pine Creek Wilderness and Hauser Wilderness) and are completely surrounded by NFS lands. Further improvement of infrastructure to this area, such as utilities and road access, required for a smaller lot size zoning would have a negative impact on wilderness values, increase the need for fuels treatments, and raise potential for the issues and impacts described above.	This comment recommends a Rural Lands 80 (RL-80) designation (one dwelling unit per 80 acres) to an area in the northeast portion of the Jamul/Dulzura CPA known as the Skye Valley Ranch. In recognition of the lack of access and infrastructure and adjacency to a federally-designated wilderness area, the proposed Project assigns a RL-80 designation, consistent with the recommendation of the commenter (refer to Figure 1-7 of the Draft SEIR). The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine the final land use designations for the Project.
R-30	**Areas west of Cuyamaca CPA.** The Forest supports RL-80 zoning for parcels adjacent to the Cuyamaca CPA along Boulder Creek Road. These parcels are located in a very undeveloped and fire prone part of the Cleveland National Forest and are adjacent to lands zoned as recommended wilderness.	This comment expresses a preference for a RL-80 designation for the parcels adjacent to the Cuyamaca Planning Area along Boulder Creek Road. The County appreciates this comment. The proposed Project reflects a combination of RL-40 and RL-80 designations for parcels in the Central Mountain Subregion adjacent to the Cuyamaca Planning Area, which was endorsed by the Board of Supervisors on June 25, 2014 and is consistent with a compromise recommended by the County Planning Commission in November 2013 (refer to Figure 1-4 of the Draft SEIR).As shown in SEIR Chapter 4, the Modified FCI Condition (Figure 4-1.3) and Mid-density (Figure 4-2.3) alternatives assign RL-80 to the entire area, as recommended by the commenter. The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine the final land use designations for the Project.
R-31	**Descanso CPA.** The Forest encourages the County to retain the lower density RL-80zoning. The northern part of the Descanso CPA abuts two areas zoned as recommended wilderness. Also adjacent to the north Descanso CPA is the King Creek Research Natural Area, which contains a rare population of Cuyamaca cypress, a Forest Service sensitive species.	This comment expresses a preference for a RL-80 designation for the northern portion of the Descanso CPA because this area abuts an area recommended for wilderness designation. The proposed Project assigns a RL-40 (one dwelling unit per 40 acres) designation (refer to SEIR Figure 1-5). The Modified FCI Condition (SEIR Figure 4.1-4) and Mid-density (SEIR Figure 4.2-4) alternatives also assign a RL-40 designation. Table 1-

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		1C has been added to SEIR subsection 1.2.1 to show how many new lots would be allowed through subdivision with buildout of the proposed Project. As shown in this table, a maximum of 26 new lots would be allowed by the proposed Project within the 5,581-acre Project area for Descanso. This is substantially less than the 751 additional lots allowed under existing land use designations. The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine the final land use designations for the Project.
R-32	All of the King Creek stands burned in a fire in 1950 and most of the area re-burned in the 2003 Cedar Fire. Post-Cedar Fire regeneration is expected to be adequate to repopulate the stands because trees were old enough to have substantial cone banks at the time of the fire; however, it is important to protect the stand from overly frequent fire especially at this vulnerable time.	The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
R-33	**Pine Valley CPA.** The Forest encourages the County to retain the lower density RL-80 zoning. This area contains many of the highest recreational and scenic values to be found on the Cleveland National Forest. Parcels in this CPA south of Interstate 8 are directly adjacent to the federally designated Pine Creek Wilderness. Parcels along Sunrise Highway are adjacent to the Mount Laguna National Recreation Area.	This comment encourages the County to retain a RL-80 designation for the Project area within the Pine Valley CPA. The County appreciates this comment. The proposed Project generally assigns RL-80 designations to parcels in the Pine Valley CPA, as shown on SEIR Figure 1-13 in Chapter 1, Project Description. Table 1-1C has been added to SEIR subsection 1.2.1 to show how many new lots would be allowed through subdivision with buildout of the proposed Project. As shown in this table, a maximum of 53 new lots would be allowed by the proposed Project within the 12,382-acre Project area for Pine Valley. This is substantially less than the 2,660 additional lots allowed under existing land use designations. The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine the final land use designations for the Project.

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R-34	The Forest also supports maintaining the proposed RL-40 zoning adjacent to Buckman Springs Road because the NFS land to the east is zoned as Back Country Non-Motorized, which is the most restrictive zoning other than recommended wilderness and designated wilderness. In addition, the Pacific Crest Trail, a 2,650-mile national scenic trail that runs from Mexico to Canada through California, Oregon and Washington, traverses this area before moving onto the National Forest. Retaining the current density limit would help maintain the recreational and scenic values.	This comment supports assigning a RL-40 designation to land adjacent to Buckman Springs Road in the Pine Valley CPA, which is consistent with the proposed Project, as shown on SEIR Figure 1-13 in Chapter 1, Project Description. The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
R-35	**Central Mountain CPA.** We recommend RL-80 zoning for parcels in the Central Mountain CPA where RL-40 zoning in the adjacent Julian CPA was extended into parcels within the Cleveland National Forest. This recommendation affects two contiguous parcels that are adjacent to the Upper San Diego River Canyon. The Upper San Diego River is an area of rugged topography and high fire danger and is zoned as recommended wilderness.	This comment recommends a RL-80 designation for the two parcels in the Central Mountain Subregion adjacent to the Julian CPA where a RL-40 designation is assigned by the proposed Project. Since these two parcels are each 40 acres, they would not be able to subdivide under either the RL-40 or RL-80 designation therefore the RL-80 designation would not reduce development potential or lessen impacts. Table 1-1C has been added to SEIR subsection 1.2.1 to show how many new lots would be allowed through subdivision with buildout of the proposed Project. As shown in this table, a maximum of 12 new lots would be allowed by the proposed Project within the 4,921-acre Project area portion of unrepresented Central Mountain. This is substantially less than the 1,034 additional lots allowed under existing land use designations. The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
R-36	**Pendleton – De Luz CPA.** The Forest recommends reducing the allowable density to RL-80 in areas surrounded by NFS lands in the Pendleton - De Luz CPA. These parcels are directly adjacent to the federally designated San Mateo Canyon Wilderness area. The parcels on Miller Mountain contain unique botanical resources and would require major road improvements across NFS lands if developed.	This comment recommends RL-80 for the parcels in the Pendleton-DeLuz CPA, since they are adjacent to the San Mateo Canyon Wilderness area and increased densities may require road improvements across CNF lands. As shown on SEIR Figure 1-12 in Chapter 1 Project Description, the proposed Project assigns a RL-80 designation to all former FCI lands within Pendleton- DeLuz, with the exception of one 0.70-acre parcel (APN 101-110-18-00), one 4.6-acre parcel (APN 101-110-17-00) and a portion of an 80-acre parcel (APN 101-110-26-00) that was only partially within the former FCI lands. These parcels are assigned a RL-40

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		designation since they are either too small to subdivide, or are not surrounded by CNF lands and were assigned RL-40 under the 2011 General Plan Update; therefore, they are not proposed to change from the existing land use designations currently in place. Table 1-1C has been added to SEIR subsection 1.2.1 to show how many new lots would be allowed through subdivision with buildout of the proposed Project. As shown in this table, a maximum of 2 new lots would be allowed by the proposed Project within the 1,011-acre Project area for Pendleton/DeLuz. This is substantially less than the 204 additional lots allowed under existing land use designations. The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
R-37	**North Mountain CPAs.** The Forest supports RL-80 zoning in the North Mountain CPA and encourages the county to retain this zoning through the planning process.	This comment supports a RL-80 designation in the North Mountain Subregion. As shown on SEIR Figure 1-11 in Chapter 1 Project Description, the proposed Project assigns a RL-80 designation to most FCI lands in the North Mountain Subregion with the exception of parcels along East Grade Road where a RL-40 is assigned. These higher densities are generally consistent with existing parcel sizes and are a result of the public outreach process, which included hearings by the Planning Commission and Board of Supervisors. Table 1-1C has been added to SEIR subsection 1.2.1 to show how many new lots would be allowed through subdivision with buildout of the proposed Project. Table 1-1C shows that the subdivision potential of the proposed Project would only allow 25 new lots in the over 17,000-acre North Mountain Subregion (20 new lots in Palomar Mountain sub-area and five new lots in the remainder of the Subregion). The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
R-38	We are uncertain of the proposed density for the triangular parcel on the north side of Warner Springs, which abuts the Caliente recommended wilderness. Reducing the density for this parcel to the	The triangular parcel in the North Mountain Subregion referenced by this comment is assigned a Specific Plan Area designation by the proposed Project (refer to SEIR Figure 1-11) and is a cultural preserve

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	RL-80 zoning would better buffer the recommended wilderness area from adjacent land uses.	which would not allow for future development. The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
R-39	The Draft SEIR should clearly make the case that the objectives presented in Chapter 1.3, as drawn from the County of San Diego General Plan, are met by the Proposed Project. In our view, the document fails to demonstrate that the Proposed Project meets the majority of the objectives and instead includes evidence that objectives will not be met. Other than stakeholder participation, the only objective that the Proposed Project could meet is the first one listed – "Support a reasonable share of projected regional population growth;" – and we feel that it fails to meet even this objective, because the failure to meet the remainder of the objectives renders the share of growth unreasonable. The Proposed Project clearly conflicts with 6 of the 10 objectives, as the rationale beneath each objective below demonstrates:	This is an introductory comment setting forth the commenter's rationale for why they believe the proposed Project fails to meet Project objectives in provided in Comments R-40 through R-45. The County does not agree that the proposed Project fails to meet the majority of the Project objectives and the rationale for how Project objectives are met is provided in Responses to Comments R-40 through R-45.
R-40	Promote sustainability by locating new development near existing infrastructure, services, and jobs. -Remote parcels within and adjacent to the Cleveland National Forest are far from infrastructure, services, and jobs.	The County does not agree that the proposed Project conflicts with the Project objective to promote sustainability by locating new development near existing infrastructure, services, and jobs. The FCI Lands GPA proposes land use designations on former FCI lands that would be consistent with the 2011 General Plan Update Policies and Guiding Principles, this is not the same as "new development." The proposed Project and Project alternatives contemplate land use designations consistent with this Project objective because it assigns low density land uses in remote areas of the unincorporated county. As discussed in Response to Comment R-02 and Global Response 2 GR-2, development could occur in these areas even without Project implementation in accordance with existing General Plan designations (No Project alternative), and at greater densities than the proposed Project. As explained in further detail below, low-density development in remote areas is proposed throughout the Project areas, while providing nearly all except for the potential growth in an area within or adjacent to an area with infrastructure, the community of Alpine, which is not remote,

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		nor far from services and jobs or employment opportunities. Therefore, the proposed Project would be consistent with this objective. It is acknowledged that most parcels within the Project area are remote and far from infrastructure, services and jobs; with the exception of parcels in the Alpine Community Planning Area (CPA). The parcels in the Project area within the Alpine CPA are located either within or adjacent to the County Water Authority boundary, adjacent to or directly east of the Alpine Village and the urban-type development of the Viejas casino, hotel and shopping mall, directly accessible to Interstate 8. Table 1-1C has been added to SEIR subsection 1.2.1 to show how many new lots could be achieved through subdivision with buildout of the proposed Project. Table 1-1C shows that the subdivision potential of the proposed Project would allow 2,470 new lots; however, only 245 of these new lots would be located outside the Alpine CPA. Table 1-1C further shows that the proposed Project would result in substantially less development than existing land use designations, which would allow 11,287 new lots (10,326 of which are located outside of the Alpine CPA). Note, Table 1-1C does not include parcels proposed for non-residential uses, such as Open Space (Conservation), Public Agency Lands, Tribal Lands, and Rural Commercial.
R-41	Promote environmental stewardship that protects the range of natural resources and habitats that uniquely define the County's character and ecological importance. -Increased development on remote parcels within and adjacent to the Cleveland National Forest threatens many of the natural resources and habitats that uniquely define the County's character and ecological importance.	The County does not agree that the proposed Project conflicts with the Project objective to promote environmental stewardship. Little increased development would occur in remote areas under the proposed Project and the increased development is substantially less than the development potential under the existing land use designations. As described in the SEIR Chapter 1 Project Description and Chapter 4 Project Alternatives, the proposed Project and alternatives all propose a reduction in development potential compared to the existing land use designations. Refer to Global Response 2 (GR-2). Furthermore, SEIR Section 2.4 analyzes impacts to vegetation communities, sensitive plants and wildlife, and wildlife corridors based on full buildout of the proposed Project and each Project alternative. The impacts from the proposed Project were compared to each Project alternative in the SEIR. The Draft SEIR concludes that as a result of the proposed Project and each Project alternative, the level of significance for special status

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		species, riparian habitat and other sensitive natural communities and wildlife movement corridors and nursery sites would remain significant and unavoidable after implementation of feasible mitigation measures and General Plan Policies. This analysis includes both existing and additional parcels gained through subdivision. Therefore, the proposed Project would be consistent with this objective.
R-42	Ensure that development accounts for physical constraints and the natural hazards of the land. -Remote parcels within and adjacent to the Cleveland National Forest experience severe risk of wildland fire incursion.	The County does not agree with the comment that the proposed Project conflicts with the Project objective to ensure that development accounts for the physical constraints and natural hazards of the land. The proposed Project will substantially reduce development potential throughout the Project areas when compared to the existing land use designations, by applying lower densities that experience severe risk of wildland fire incursion. Therefore, the proposed Project would be consistent with this objective. Refer to Global Response 2 (GR-2). The proposed Project substantially reduces development potential in remote areas, when compared to existing land use designations. Meeting Project objectives is not a significance criteria employed for impact determination; refer to Global Response 1 (GR-1). Potential impacts associated with the development on a site which would result from physical constraints are evaluated throughout the SEIR; the comment is not specific to any individual constraint.
R-43	Provide and support a multi-modal transportation network that enhances connectivity and supports community development patterns. -Remote parcels within and adjacent to the Cleveland National Forest are accessible only by passenger vehicle and road access is substandard for general residential use.	This Project objective does not apply to the remote areas referenced by the comment because the intention of this Project objective is to support a multi-modal transportation network in areas with compact development patterns (Refer to Guiding Principle 6 on page 2-12 of the County General Plan). Meeting Project objectives is not a significance criteria employed for impact determination; refer to Global Response 1 (GR-1). The proposed Project will substantially reduce development potential throughout the Project areas when compared to the existing land use designations, by applying lower densities, see Table 1-1A; refer to Global Response 2 (GR-2). The proposed Project assigns Rural Lands designations (one dwelling per 40 or 80 areas) as shown on the land use maps provided in the SEIR as Figures 1-3 through 1-14. Development applications associated with the former FCI-lands will be required to

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		meet current design standards for access, depending on the proposed development; private or public road standards would be a standard condition of approval. Therefore, the proposed Project would be consistent with this objective.
R-44	Maintain environmentally sustainable communities and reduce greenhouse gas emissions that contribute to climate change. -Remote parcels within and adjacent to the Cleveland National Forest would not be environmentally sustainable for numerous reasons cited throughout this letter, and the development and access would increase greenhouse gas emissions that contribute to climate change.	The County does not agree that the proposed Project conflicts with the Project objective to maintain environmentally sustainable communities and reduce greenhouse gas emissions. Meeting Project objectives is not a significance criteria employed for impact determination; refer to Global Response 1 (GR-1). The proposed Project will substantially reduce development potential throughout the Project areas when compared to the existing land use designations by applying lower densities, which would in turn reduce greenhouse gas emissions when compared to existing General Plan designations (No Project Alternative) (see Table 1-1A; refer to Global Response 2 (GR-2)). Please also see Response to Comment R-40 for reasons why slightly increased development potential near Alpine is proposed. VMT is analyzed in the SEIR subsection 2.15.3.1, Estimation of Greenhouse Gas Emissions, and VMT calculations are shown in the SEIR Appendix F, pages F-1 through F-3.
R-45	Minimize public costs of infrastructure and services and correlate their timing with new development. -Remote parcels within and adjacent to the Cleveland National Forest would maximize public costs of infrastructure and services.	The County does not agree that the proposed Project conflicts with the Project objective to minimize public costs of infrastructure. Meeting Project objectives is not a significance criteria employed for impact determination; refer to Global Response 1 (GR-1). The comment does not explain how private wells that use groundwater and development applications necessarily "would maximize public costs of infrastructure and services." The proposed Project will substantially reduce development potential throughout the Project areas when compared to the existing land use designations; refer to Global Response 2 (GR-2). The proposed Project assigns Rural Lands designations (one dwelling per 40 or 80 areas); see SEIR Figures 1-3 through 1-14. The majority of single-family homes that would be developed within the FCI-lands will necessitate their own potable water well and alternative waste water treatment systems; i.e. septic tanks, rather than public systems. These are private infrastructure

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		elements, not public.
R-46	The assumption is made throughout the analysis of potential impacts that "regulations, implementation programs, and mitigation measures from the General Plan Update EIR" will result in impacts that fall below the threshold of significance. This assumption is flawed in that it fails to recognize the irretrievable losses to natural and cultural resources involved when subdividing new areas of an already densely populated region.	The County disagrees that an "assumption" of less than significant impacts was made throughout the SEIR in the impact analysis. The SEIR contains substantive analysis and reasoning as to how impact conclusions were reached. Furthermore, the proposed Project itself does not "subdivide" areas of the region. As previously detailed, the proposed Project provides updated land use designations within the Project area that currently have a land use designation that goes back to the 1978 General Plan due to the expiration of the FCI. SEIR Executive Summary Table S-2 provides a summary of the level of significance for each topic area analyzed in the Draft SEIR. This table shows that 46 topic areas were determined to be Less than Significant and 24 topic areas Significant and Unavoidable after mitigation measures. These determinations were made consistent with the criteria in CEQA Guidelines Section 15126.4. As discussed in Section 1.7, SEIR Impact Analysis Methodology, the methodology for analysis of potential environmental impacts associated with the proposed Project is similar to that performed in the General Plan Update (GPU) Program EIR. The FCI Lands GPA SEIR, supplements the General Plan Update Program EIR. The General Plan Update PEIR was developed consistent with CEQA guideline 15168. The potential for significant impacts and their mitigation from General Plan Policies and Mitigation Measures is summarized in the Executive Summary and can be reviewed in Table S-2. The relative impacts comparing the project alternatives are summarized and can be reviewed in Table 4-1. Concerning cultural resources, it was determined that impacts would be less than significant with the adherence to numerous General Plan policies and mitigation measures. Concerning "natural resources," several impacts within biological resources were determined to be significant and unavoidable after mitigation.
R-47	The Draft SEIR presents numerous plans and projects considered in evaluating cumulative impacts, but it fails to include the impacts of the past development of San Diego County, as represented by the existing condition of the region. When viewed through this lens, further	Cumulative impacts are considered to be a project's impacts combined with the impacts of other related past, present and reasonably foreseeable future projects. The Draft SEIR cumulative analysis considers the impacts of past development by virtue of the fact that it is a Plan to

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	increases of population density in remote areas of the County will necessarily have significant impacts, regardless of "regulations, implementation programs, and mitigation measures." The scope of the cumulative impacts section needs to be broadened to include development that has occurred up to the current time.	Ground analysis that considered existing conditions at the time the NOP was issued. Each resource and its associated significance criteria is analyzed for direct, indirect and cumulative impacts and the potential for impacts prior to and post implementation of General Plan Policies and Mitigation Measures is disclosed throughout the document. Please refer to Table S-2 for a summary of the impact determinations.
R-48	While the Draft SEIR considers many topics, it fails to offer the level of detail that would be needed to evaluate the environmental impacts of its alternatives. We feel that as a result of the vague nature of the analysis presented, environmental and public health and safety impacts have not been sufficiently analyzed or disclosed. Examples of these deficiencies are provided below by topic.	The County does not agree that the SEIR fails to offer the level of detailed needed to evaluate the environmental impacts of its alternatives. The SEIR is a Program EIR, which the County has prepared to comprehensively address development within the Project areas. As detailed in CEQA Guideline 15168(b), a Program EIR can: (1) Provide an occasion for a more exhaustive consideration of effects and alternatives than would be practical in an EIR on an individual action, (2) Ensure consideration of cumulative impacts that might be slighted in a case-by-case analysis, (3) Avoid duplicative reconsideration of basic policy considerations, (4) Allow the Lead Agency to consider broad policy alternatives and program-wide mitigation measures at an early time when the agency has greater flexibility to deal with basic problems or cumulative impacts, and (5) Allow reduction in paperwork. The SEIR prepared for the proposed Project provides these benefits to both the Lead Agency and other interested parties. The SEIR provides an exhaustive analysis of reasonably foreseeable impacts that would occur under adoption of the proposed Project. Consistent with CEQA Guideline 15126.6 (a) (b) and (c), the FCI Lands GPA SEIR analyzes a reasonable range of alternatives which are described within Chapter 4 of the Draft SEIR and include No Project, Alpine Alternative Land Use Map, Mid-density and Modified FCI Condition alternatives, along with alternatives considered but rejected, such as Reduced Development/No Build, Increased Intensity (Alpine CPA), FCI Density, No New East Willows Village and City-Centered. Consistent with CEQA Guideline 15126.6 (d) the SEIR "…include(s) sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project." As discussed in the Draft SEIR, the No New East Willows Village and No Project alternatives would have greater impacts because they would

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		have greater densities and/or intensity than the proposed Project; refer to Global Response 2 (GR-2). The Modified FCI Condition, Mid-density and Alpine Alternative Land Use Map alternatives all reduce the severity of potential impacts relative to their decreased density and or intensity when compared to the proposed Project. The potential impacts associated with the Project alternatives are compared to the proposed Project and the Draft SEIR provides independent analysis of the alternatives as required by CEQA Guideline 15126.6(d). Specific public health and safety impacts are not identified by the comment; potential impacts of the proposed Project related to public health and safety are evaluated in Sections 2.6 Hazards and Hazardous Materials and 2.11, Public Services. Each Project alternative potential impact analysis for all resource subjects are found throughout the Project Alternatives analysis of Chapter 4.
R-49	With regard to description of the impacts of the FCI Lands project on biological resources, there is no description of the actual impacts, as no inventory, identification, or evaluation of such resources has been completed and the actual impacts are unknown. Instead, there is only a general discussion of potential project impacts on general plant and wildlife species. These are assumed to be significant and unavoidable for special status species, riparian habitat, and wildlife movement corridors (Table S-2). However, there is no identification of effects on individual species even though the project will adversely affect or is likely to adversely affect a number of federally-listed species including Arroyo Toad, California Gnatcatcher, and San Diego Thornmint as well as candidate species for listing such as Hermes Copper butterfly.	The County disagrees with the comment that potential impacts to sensitive species are not identified and disclosed. Please see Response to Comment R-48 for the intent of a Program EIR. The Draft SEIR for the FCI Lands GPA is a programmatic document. The FCI Lands GPA SEIR supplements the General Plan Update Program EIR. The General Plan Update PEIR was developed consistent with CEQA guideline 15168. The potential for significant impacts and their mitigation from General Plan Policies and mitigation measures is summarized in the Executive Summary and can be reviewed in Table S-2. The relative impacts comparing the Project alternatives are summarized and can be reviewed in Table 4-1. The Draft SEIR evaluates potential impacts using a plan to ground analysis. Subsection 2.4.3.1 regarding special status plant and wildlife species discloses: "This proposed Project consists of changes to the land use designations over 71,700 acres of land which support special status plant and wildlife species. Similar to the 2011 General Plan, the project would directly or indirectly impact habitats of candidate, sensitive, or special status species. The General Plan Update PEIR included a discussion of each vegetation community in the unincorporated County and the species supported by each vegetation community in subsection 2.4.1.2 of the General Plan

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		Update PEIR. Table 2.4-1 (Habitat Impacts by Vegetation Community) quantifies the total number of acres of each vegetation community that could be potentially affected by new development under the proposed Project. The majority of the impacts are expected to occur within scrub and chaparral, woodland and forest vegetation communities, with lesser impacts occurring on riparian and bottomland habitat, grasslands, vernal pools, meadows and other herb communities. The species that occupy these habitats are the same as those identified in the General Plan Update PEIR and can found in subsection 2.4.1.4, pages 2.4-2 to 2.4-9, under each vegetation description. Appendix C of the General Plan Update PEIR, Table C1, Special Status Plant Species with a Potential to Occur within San Diego County and Table C2, Special Status Wildlife Species with a Potential to Occur within San Diego County is hereby incorporated by reference." The SEIR discloses that habitat may be impacted and when Table C1 is reviewed, individual species which are associated with those impacted habitats are specifically identified.
R-50	The proposed alternatives will also adversely affect many of our Regional Forester's list of Sensitive Species through direct mortality and habitat loss and fragmentation, creating difficulties for conserving their populations on NFS lands. The blanket approach taken by the Draft SEIR does not adequately describe and disclose effects on these species, effectively leaving this analysis to later piecemeal analyses that will be done for individual projects. This does not allow for meaningful protection and conservation of these species across broader areas and is therefore inconsistent with the purpose and intent of CEQA.	The County does not agree with the comment that the SEIR analysis does not adequately analyze and disclose potential effects; see Responses to Comments R-48 and R-49. The SEIR does not represent a piecemeal analysis; rather, it comprehensively addresses the reasonably foreseeable impacts of the "program," which in this case is the updated land use designations of the Project areas. By comprehensively addressing these land use designation changes, the mitigation measures provide a framework for future projects that would be implemented under the program.
R-51	Given the lack of detail in the SEIR, it is not possible to perform a meaningful comparison of the effects of the different alternatives. The analysis does not provide enough information to determine which alternative would best conserve key resources.	Please see Responses to Comments R-48, R-49 and R-50. The County does not agree that the Draft SEIR lacks sufficient detail to perform a meaningful comparison of the effects of the different alternatives. In Chapter 4 of the revised Draft SEIR, relative impacts comparing the Project alternatives are summarized and can be reviewed in Table 4-1. Tables 4-2 through 4-12 the Draft SEIR also provide a comparison of the

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		Project alternatives relative to various resources. These tables include data on land use distribution, number of dwelling units at buildout, potential impacts to the Palomar and Mount Laguna Observatory Zone A at buildout, agricultural lands and impact estimates, proposed land uses in forest resources, area-wide and mobile source emissions, biological resources impacts, proposed land use within flood areas, proposed land uses in designated Mineral Resource Zone area and average daily traffic generation. In addition, SEIR Figures 2.4-2A and 2.4-2B have been enhanced to also show East County Focused Conservation Areas (FCAs) and conserved areas.
R-52	Section 15123(b)(3) of the CEQA Guidelines requires that an EIR address the issues to be resolved, which includes the choices among alternatives and whether or how to mitigate significant impacts. As stated in the Draft FCI Lands SEIR, the major issues to be resolved regarding the project include decisions by the Lead Agency as to whether or not the Draft SEIR adequately describes the environmental impacts, whether the recommended mitigation measures identified for the Proposed Project should be adopted or modified, or if additional mitigation measures should be required.	The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
R-53	In regard to adequate description of the impacts of the FCI Lands project on historic or archaeological resources, there is no description of the actual impacts, as no inventory, identification, or evaluation of such resources has been completed and the actual impacts are unknown. Instead, there is only a general discussion of potential project impacts, which are assumed in advance to be less than significant through the implementation of various policies and mitigation measures contained in the General Plan Update.	The Draft SEIR for the FCI Lands GPA is a programmatic document. The FCI GPA SEIR supplements the General Plan Update Program EIR. The General Plan Update PEIR was developed consistent with CEQA guideline 15168. The potential for significant impacts and their mitigation from General Plan Policies and Mitigation Measures is summarized in the Executive Summary and can be reviewed in Table S-2. The relative impacts comparing the Project alternatives are summarized and can be reviewed in Table 4-1. As such, the Draft SEIR evaluates potential impacts using a plan-to-ground analysis. The County disagrees with the comment that potential impacts to cultural resources are not identified and disclosed, nor is assumed in advance, to be less than significant. Refer to the Impact Analysis portions of Section 2.5 of the SEIR. Historical resources are analyzed in subsection 2.5.3.1; Archaeological Resource impacts are discussed in subsection 2.5.3.2; Paleontological resource impacts are discussed in subsection 2.5.3.3;

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		Human Remains resource impacts are discussed in subsection 2.5.3.4; and the mitigation for each of these resource impacts begins with subsection 2.5.4.
R-54	Table S-2, "Summary of Project Impacts" and various sections of the Draft FCI Lands SEIR contain information indicating that implementation of the Proposed Project would result in new development that would have the potential to result in substantial adverse changes to the significance of historical resources and cause a substantial adverse change in the significance of archaeological resources, including the destruction or disturbance of archaeological sites that contain or have the potential to contain information important to history or prehistory. However, with the application of various policies and mitigation measures, impacts to historic and archaeological resources are assumed to be "less than significant." It is unclear from the analysis that cultural resources will actually be protected by such policies and measures to the extent that they would not be significantly affected by the Proposed Project.	The County disagrees with the characterization of impacts being presumed. The impacts are determined using the appropriate significance criteria and described in the various subsections identified in Response to Comment R-53. Further, the comment acknowledges that impacts have been determined, which is inconsistent with the previous comment asserting that impacts are not adequately disclosed. The applicable mitigation measures identified within subsection 2.5.4 would apply to future development through the imposition of project Conditions of Approval and/or mitigation measures through discretionary permit approvals. No evidence has been provided in this comment that provides the rationale to assert the inefficacy of the identified General Plan Policies and mitigation measures.
R-55	In Section 2.5 "Cultural Resources" of Table S-3 and various other sections of the Draft SEIR contain information indicating that the "Modified FCI Condition" alternative is likely to result in less impacts to historical and archaeological resources when compared to Proposed Project, and that implementation of the "No Project" alternative is likely to result in greater impacts when compared to the Proposed Project. However, under the mitigation process proposed in the Draft SEIR, impacts to historic and archaeological resources would be "less than significant" with the implementation of mitigation measures for the Proposed, Modified, and No Action alternatives.	This comment correctly characterizes the analysis in the Draft SEIR that the Modified FCI Condition alternative is likely to result in less impacts to historical resources when compared to the proposed Project (SEIR subsection 4.2.2.5) and that impacts to historical and archaeological resources would considered significant and would require mitigation measures identified in the Draft SEIR (SEIR subsections 4.2.2.5, 4.3.4.5, 4.4.2.5, 4.5.2.5). The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
R-56	This assumption is based on the assumption in advance that historic and archaeological resources are distributed evenly throughout the FCI lands. Depending on the actual distribution of these resources within the FCI lands, the differences in potential impacts between the implementation of the Proposed, Modified, and No Action alternatives could be substantially different than those assumed in the Draft SEIR. The only real difference between the implementation of any one of	The County does not agree with the comment that the significance of potential impacts is made by assumption, nor does the SEIR state an assumed distribution of resources. Rather, Figure 2.5-1, Historical Resources, identifies the County's historic resources in relation to the areas affected by the proposed Project; distribution of resources is not assumed for known resources. However, the presence of unknown resources is assumed and General Plan Policies and mitigation measures

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	these three scenarios would be the potential for significant impacts, not actual impacts, assuming the implementation of policies and mitigation measures always result in "less than significant" impacts. As a result, the comparison of these three scenarios is of no actual quantitative or qualitative value for the purposes of identifying an "Environmentally Superior" course of action.	have been identified in SEIR Section 2.5.4, that address the potential impacts to unknown resources and the SEIR determined these policies and measures will render the potential impacts to a less than significant level. The variable levels of proposed development densities and intensity, is the basis of comparison between the proposed Project and the alternatives. The quantitative comparison of development potential reveals the Modified FCI Condition alternative as the Environmentally Superior alternative. The comment does not offer additional alternatives, policies or mitigation measures to address the identified potential impacts. The SEIR discloses the potential for impacts to known and unknown cultural resources and identifies General Plan Policies and mitigation measures to address the potential impacts caused by construction activities such as grading and excavation, and renders them less than significant. No changes to the environmental document are required.
R-57	Page 12 of the "County Cultural Guidelines" states that "Determining what is an important cultural resource worth preserving [sic] is a subjective and interpretive process; therefore, it is useful to utilize a standard assessment approach to evaluate cultural resources. In order to evaluate cultural resources, a comprehensive assessment must be conducted, including measuring the resource against the State CEQA Guidelines provisions and criteria established by the National Register of Historic Places, the California Register of Historical Resources, and the San Diego County Local Register of Historical Resources, and the Resource Protection Ordinance as well as assessing the integrity of the resource."	The comment fairly characterizes the criteria used to evaluate cultural resources. The SEIR discusses the Regulatory Framework that pertains to cultural resources in subsection 2.5.2. The Guidelines for Determining Significance are discussed in subsections 2.5.3.1, 2.5.3.2, 2.5.3.3 and 2.5.3.4.
R-58	Without any actual assessment or evaluation of historic and archaeological resources within the FCI Lands project area, there is no quantitative or qualitative basis for comparing the various courses of action, selecting an "Environmentally Superior" alternative, determining whether the recommended mitigation measures identified for the Proposed Project should be adopted or modified, or determining if additional mitigation measures should be required for this project, as the Draft FCI Lands SEIR does not adequately describe	The SEIR discloses the potential for impacts to known and unknown resources; the County disagrees with the comment that no "actual assessment or evaluation of historic and archaeological resources" has occurred. Moreover, there is no need to further evaluate a known cultural resource, as the resource's attributes that make the artifact, place, building or landscape a resource has already been identified and their significance determined. The SEIR analyzes the potential for impacts to these resources as they are already known to be resources.

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	the impacts of the Proposed Project on historic and archaeological resources.	Unknown resources are just that: unknown. Unless and until they are discovered, unearthed or otherwise disturbed, they remain unknown. See Responses to Comments R-52 through R-56. Alternatives described in the Draft SEIR include a No Project, Alpine Alternative Land Use Map, Mid-density and Modified FCI Condition. The variable levels of proposed development densities and intensity, is the basis of comparison between the proposed Project and the alternatives. The quantitative comparison of development potential reveals the Modified FCI Condition alternative as the Environmentally Superior alternative. The comment does not offer additional alternatives, policies or mitigation measures to address the identified potential impacts. The SEIR discloses the potential for impacts to known and unknown cultural resources and identifies General Plan policies and mitigation measures to address the potential impacts caused by construction activities such as grading and excavation, and renders them less than significant. No changes to the environmental document are required.
R-59	The section that deals with Wildland Fire (2.6.3.7) concludes that the Proposed Project would have significant impacts related to wildland fire, while suggesting that regulations, implementation programs, and mitigation measures would reduce those impacts.	This comment concerning subsection 2.6.3.7 of the SEIR is consistent with information contained in the Draft SEIR. The Draft SEIR states clearly that the General Plan Policies and mitigation measures result in the reduction of impacts to a level of less than significant.
R-60	In the Mitigation Measures section (2.6.4.7), several mitigation measures are deemed infeasible that would dramatically reduce losses of homes and lives through restricting development in areas with more than a moderate fire hazard or requiring extensive fuel modification around development. Instead, the analysis determines that “one of the primary objectives of the project which is to accommodate a reasonable amount of growth” renders these mitigation measures infeasible. Apart from the fact that this conclusion disregards the remainder of project objectives, it also suggests that it is more valuable to allow growth in high and very high fire hazard areas than to protect those homes and people from the very hazards that the mitigation measures were designed to prevent. The end result of increasing population density on the former FCI lands will be greater losses of lives and property to recurrent wildland fire.	The comment misinterprets the determination of infeasibility of mitigation measures that would limit future development in effort to reduce hazards associated with wildland fire; these mitigation measures apply to the entire unincorporated County rather than just the Project areas as they are General Plan Policies and mitigation measures. As disclosed in SEIR subsection 2.6.4.7, the determination of the mitigation measure as infeasible is also attributed to the requirement for extensive fuel modification around existing and future development in Wildland Urban Interfaces. This mitigation measure would be inconsistent with General Plan and Project objectives to protect biological resources, minimize impacts to drainage patterns and to limit modification to the visual landscape. Restricting growth in areas already identified by the General Plan as areas to accommodate growth would conflict with General Plan objectives to accommodate a reasonable share of growth,

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		consistent with the Community Development Model. The County disagrees that the proposed Project increases population density (refer to Response to Comment R-2 and GR-2). Refer also to the SEIR Chapter 4 table in subsection 4.1.1. under the considered but rejected FCI Density Alternative, which shows that 81.4% of the Project acreage would either reduce or retain the RL-40 density analyzed in the 2011 General Plan EIR. Generally, those areas where densities are proposed to increase are either not in remote areas or reflect existing parcel sizes; therefore, do not allow for additional subdivision.
R-61	On a related note, the sections that Deal with Emergency Response and Evacuation Plans (2.6.3.6 and 2.6.4.6) conclude that significant impacts will be avoided through regulations, implementation programs, and mitigation measures. Three of the four measures presented, however, do not reflect the reality of the roads that would provide access to many of the FCI lands. These roads generally lack an interconnected road network, multiple ingress and egress routes, and suitability for use as rural roads serving residential subdivisions. The hazards of unsuitable escape routes resulting from these conditions along with the above-mentioned permission to develop in areas with high to very high fire hazards makes the likelihood even greater that implementation of the Proposed Project would lead to tragic losses of life and property.	The County does not agree with this comment. In reference to subsection 2.6.3.6 Emergency Response and Evacuation Plans of the SEIR, the significance criteria is: *Based on Appendix G of the CEQA Guidelines and the County of San Diego Guidelines for Determining Significance, Emergency Response Plans, the proposed Project would have a significant impact if it would impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan.* Subsection 2.6.4.6 discusses those General Plan Policies and mitigation measures related to Emergency Response and Evacuation Plans. As can be reviewed in subsection 2.6.4.6, General Plan Polices have been developed to support efforts and programs that address reducing the risk of natural and man-made hazards and the appropriate disaster response, provide for an interconnected public road network with multiple connections that improve efficiency, provide both primary and secondary access/egress routes that support emergency services during fire and other emergencies, require new development to provide multiple access/egress routes, and require public and private roads to allow for necessary access for fire apparatus and emergency vehicles accommodating outgoing vehicles from evacuating residents. Adherence to these policies will reduce direct impacts to emergency response and evacuation plans from future development. Additionally, mitigation measure Haz-3.3 will ensure that projects are consistent with adopted emergency and evacuation plans. Therefore, the proposed Project would have a less-than-significant impact for the reasons detailed above.

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R-62	Given that the FCI lands are by definition in close proximity to the Cleveland National Forest, it is surprising to find no mention of our Land Management Plan in Section 2.8.3.2, which considers "Conflicts with Land Use Plans, Policies, and Regulations." As described in the beginning of this letter, increasing population density on FCI Lands would lead to numerous environmental and public health and safety issues on the Cleveland National Forest, as described in our 2005 Land Management Plan, and would accelerate problems that our Plan directs us to remedy. As a result, we call into question the determination that project impacts with regard to land use plans, policies, or regulations would be below a level of significance. The conflict of this project with our Land Management Plan should be investigated and disclosed as part of this analysis.	County staff reviewed the Land Management Plan for potential conflicts throughout the FCI Lands GPA process. County staff also coordinated with USFS staff to ensure that the Land Management Plan was fully understood and to get feedback on the County's draft plans. In addition, much of the proposed Project land use map was developed in response to the USFS comment letter on the Draft SEIR circulated for public review in 2013. The following specific areas reflect the recommendations in the 2013 USFS comment letter: • Alpine northeast of the Viejas Reservation • Jamul [Skye Valley Ranch] • Pine Valley • Central Mountain • Areas west of Cuyamaca CPA • Descanso • Pendleton-DeLuz • North Mountain There are only two areas that the proposed Project land use map does not reflect the land use designations recommended by the USFS staff in 2013. These areas, along with the County's response are provided below. Alpine CPA north and south of Interstate 8 (I-8) — Development regulations will require adequate infrastructure, such as the expansion of imported water and road access before discretionary development application are approved. Therefore, no conflict with the Land Management Plan has been identified to date.
R-63	Nowhere is the disconnect between this project and our Land Management Plan greater than where the FCI lands are adjacent to or within designated or recommended wilderness areas. There is no mention of designated or recommended wilderness on the Cleveland National Forest.	The proposed Project land use map reflects the USFS staff comments provided in 2013; please refer to Response to Comment R-62. The County does not agree there is a "disconnect" between this project and the Forest Land Management Plan. FCI lands are not within designated or recommended wilderness areas as these areas are federal lands not subject to local land use authority.
R-64	As such, there is no basis provided for evaluating the potential for the project to impact wilderness areas adjacent to FCI Lands. Potential project impacts on the wilderness resource could be significant and	Please see the Response to Comment R-63. FCI lands are not within designated or recommended wilderness areas as these areas are federal lands not subject to local land use authority. In addition, as detailed in

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	unavoidable, although it is not possible to perform a meaningful comparison of the effects of the different alternatives due to the lack of mention of wilderness in the Draft SEIR.	Draft SEIR Section 2.4.3.1, it is acknowledged that the Project would result in indirect impacts to sensitive species and habitat where such development occurs adjacent to CNF lands or MSCP Preserves. Such indirect effects include, but are not limited to, intensive nighttime lighting, noise, and domestic pets which can adversely affect wildlife species. Such impacts would also be cumulative in nature as they would contribute to the permanent loss of the County's biological resources on a regional level (i.e., through the physical demolition, destruction, relocation, or alteration of these resources and/or immediate surroundings), when combined with other development allowed under the 2011 General Plan. Indirect impacts would be significant and unavoidable. The Board of Supervisors would consider this impact when determining to approve or deny the project and a Statement of Overriding Considerations would be required if project approval were to occur. Furthermore, as shown in SEIR Executive Summary Table S-2 and subsection 2.2.3.4, the Draft SEIR determined that regarding Direct and Indirect Loss or Conversion of Forestry Resources, the proposed Project would result in significant and unavoidable impacts. The comment does not raise an issue at variance with the existing content of the Draft SEIR.
R-65	Section 2(c) of the Wilderness Act of 1964 (Public Law 88-577) defines wilderness: "A wilderness, in contrast with those areas where man and his own works dominate the landscape, is hereby recognized as an area where the earth and its community of life are untrammeled by man, where man himself is a visitor who does not remain. An area of wilderness is further defined to mean in this Act an area of undeveloped Federal land retaining its primeval character and influence, without permanent improvements or human habitation, which is protected and managed so as to preserve its natural conditions and which (1) generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable; (2) has outstanding opportunities for solitude or a primitive and unconfined type of recreation…" In summary, the key elements of wilderness include its natural state (biological and other natural processes operating unimpaired,	The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.

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	uninhibited, and unchanged by humans), opportunities for solitude and primitive recreation opportunities, undeveloped character, and untrammeled (unmanaged) nature.	
R-66	Increased density and development near or adjacent to designated or recommended wilderness areas would likely adversely affect the wilderness resource in a number of ways. Increased population in the County, particularly in rural areas, may result in increased use of wilderness, therefore impacting opportunities for solitude and primitive recreation opportunities.	The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
R-67	The visual impact of subdivisions on the wilderness user is also due consideration. Development in the vicinity of wilderness increases the likelihood that non-native, invasive species would be introduced into wilderness, thereby disrupting natural processes within the wilderness.	As discussed in Response to Comment R-40, the proposed Project would allow only 245 additional lots within the entire Project area outside the Alpine CPA; little additional development potential would be allowed adjacent to wilderness areas. Consistent with the discussion of SEIR subsection 2.4.3.2, invasive plants, in addition to other effects, will indirectly and cumulative impact federal lands and MSCP preserves. These impacts are disclosed as significant and unavoidable even after the implementation of mitigation and General Plan policies.
R-68	Development upstream within watersheds shared by wilderness increases the likelihood of impaired water quality or decreased stream flows in wilderness due to runoff, impoundments, and/or groundwater use.	The comment does not raise an issue regarding the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
R-69	Similarly, development adjacent to wilderness increases the likelihood that landowners build trespass structures, roads, or trails in wilderness, or use motorized or mechanized equipment in wilderness, thereby impacting its undeveloped character.	The comment does not raise an issue regarding the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
R-70	Finally, increased development and density near wilderness increases the likelihood that fire management activities would impact the wilderness resource during wildfire events, which impacts the natural and untrammeled characteristics of wilderness.	The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. See also, Responses to Comments R-4, R-19, R-40 and R-43.
R-71	While the SEIR presents a very broad analysis of the effects of the project on recreation facilities, it does not contain any discussion or analysis of recreation activities in undeveloped, backcountry areas accessed by trail or cross-country travel. Increased recreation in	The County is not proposing to increase recreation land use or facilities under the FCI Lands GPA. Analysis of potentially significant effects on recreation resources from future development on lands affected by the proposed FCI Lands GPA is analyzed in SEIR subsection 2.12.3 and

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	undeveloped, backcountry areas can have substantial adverse effects on the environment, including litter, graffiti, impaired water quality, erosion, increased risk of wildfire, and various impacts to vegetation, wildlife, and cultural resources.	General Plan Policies and feasible mitigation measures are identified in the Draft SEIR, subsection 2.12.4. See also Response to Comment R-72.
R-72	Increased population in the County would likely lead to an increase in recreation in both developed facilities and undeveloped, backcountry areas. While this increased use could have beneficial recreational impacts, the SEIR should include an analysis of environmental impacts that result from recreation in undeveloped backcountry areas, as it does for developed facilities.	The County concurs that increased population could lead to an increase in recreation, which is analyzed within the Draft SEIR. Draft SEIR subsection 2.2.4.3 recognized that future development within the Project area may result in land uses that are incompatible with adjacent or nearby CNF lands and that such development could eventually lead to permanent impacts on the CNF lands due to factors such as erosion/siltation, invasive plants, edge effects (e.g., human intrusion, predation by pets), noise (e.g., nest abandonment), night-lighting (e.g., nocturnal wildlife predation), and habitat fragmentation, or the indirect conversion of such lands to non-forest use. SEIR subsection 2.2.4.4 determined that even with the implementation of mitigation measures, the direct conversion of forestry resources would remain significant and unavoidable. In addition, analysis of potentially significant effects on recreation resources from future development on lands affected by the proposed FCI Lands GPA is analyzed in SEIR subsection 2.12.3 and General Plan Policies and feasible mitigation measures are identified in the Draft SEIR, subsection 2.12.4.
R-73	We appreciate the development and consideration of the Modified FCI Condition (Environmentally Superior) Alternative as described in Chapter 4.1. From our perspective, the sacrifice of 28% of the residential dwelling units of the Proposed Project would be worth the resultant protection of resource conditions and reduction of wildfire risk to communities and would best achieve the objectives of the General Plan. Moreover, the areas where the lower densities would be located, as specified in the Modified FCI Condition Alternative, are precisely the areas where resource and wildfire concerns are greatest. As a result, we strongly support the adoption of the Modified FCI Condition Alternative rather than the Proposed Project.	The comment presents the commenter's preference for the Modified FCI Condition alternative. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.

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R-74	In addition, we request provisions that development on private lands will not rely on the Cleveland National Forest for infrastructure or vegetation management needs and that impacts to the Cleveland National Forest from such development will be avoided, minimized, or mitigated.	See Response to Comment R-6. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
R-75	To conclude, we appreciate the consideration that you have given to our past concerns about this project and hope that you give similar consideration to our concerns about the re-circulated Draft SEIR. We are very interested in working with the County of San Diego to achieve the objectives of the project that address environmental sustainability and risk avoidance. Thank you for the opportunity to comment on the potential impacts of the Proposed Project for the former FCI lands in the unincorporated areas of San Diego County. If you have any questions about these comments, please contact Jeff Heys, Forest Planner, at (858) 674-2959.	This comment provides concluding remarks and does not raise a significant environmental issue for which a response is required.

Responses to Comment Letter S
California Native Plant Society
February 29, 2016

	Comment	Response to Comment
S-1	Thank you for the opportunity to comment on the Forest Conservation Initiative Lands (FCI) General Plan Amendment (GPA). The San Diego Chapter of the California Native Plant Society (CNPSSD) works to protect California's native plant heritage and natural ecology to preserve precious and often threatened resources for future generations. We work closely with decision-makers, scientists, and local planners to advocate for well informed and environmentally friendly policies, regulations and land management practices.	This comment is an introduction to comments that follow. No further response is required.
S-2	In general, we support the Environmentally Superior Modified FCI Condition Alternative. Our reason is that we believe the County generally underestimates the real impacts of climate change and extended drought. While we advocate for native plants and plant communities, we are also San Diegans, and putting people and plants in dangerous situations should be avoided.	This comment advocates support for the Modified FCI Condition alternative and states that the County "generally underestimates the real impacts of climate change and extended drought." The County does not agree with the latter comment. However, the last sentence of SEIR Section 2.15.3.2 Potential Effects of Global Climate Change on the Proposed Project acknowledges the Project's impacts would be significant and unavoidable (page 2-15-20). The comment does not otherwise provide the manner in which these impacts are underestimated. The comment also states that "putting people and plants in dangerous situations should be avoided." It is not entirely clear as to what the comment is specifically contending, and therefore a specific response cannot be provided. However, it should be noted that the SEIR analyzed potential impacts from the Project associated with Global Climate Change, Hazards and Hazardous Materials, etc. Please refer to Chapter 2of the SEIR. Finally, the comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
S-3	In this case, dangers include things like fire, for people living on the wildland-urban interface.	Section 2.6 of the SEIR analyzed potential impacts associated with wildland-urban interface (WUI) areas. As detailed therein, impacts would be significant and unavoidable even after the implementation of

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		mitigation. The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
S-4	Dangers include extended droughts, and their follow-on effects on groundwater uptake, reduced ability to fight fires due to reduced reservoirs, and extended drought causing people to abandon properties and move, as happened in the Dust Bowl.	This comment generally discusses groundwater, water supply and wildland fires, which are analyzed within SEIR Sections 2.7, 2.14 and 2.6, respectively. The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
S-5	They also include the dangers of floods, especially when heavy rain falls on a drought-stricken landscape.	This comment generally raises concerns regarding the dangers of floods. Flooding is analyzed within SEIR Section 2.7. The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
S-6	For all these reasons, we urge the County to be conservative in its growth. Like it or not, growth in this County is a multivariate calculus that involves the long-term availability of water, power, and food. Growth is no more inevitable here than it was in Detroit or the Yucatan of the Classic Maya. We should be thoughtful about how we encourage people to put down roots here.	The County acknowledges the commenter's support for conservative growth in the Project area. The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. However, overall, the proposed Project land use map has lower land use intensities than the existing land use designations. The lower intensity of the proposed Project would reduce the subdivision capacity within the Project areas by 8,849 lots, when compared to the existing land use designations (No Project Alternative), [see Draft SEIR, Chapter 4, Table 4-4]. Therefore, the proposed Project takes a more conservative approach to growth than the existing land use designations. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
S-7	In regard to native plant species, our concerns and suggestions are as follows: • Plant species need to be able to move to adapt to climate change. In past periods of climate change, as during the last ice age, native plant species survived by migrating, just as animals survived by migrating. Wildlife corridors should be designed so that native plants can migrate (by means of seeds) too.	The County does not agree that the SEIR needs to be revised to incorporate ideas on the design of wildlife corridors. The underlying purpose of the proposed Project is to update land use designations for numerous, scattered FCI Lands throughout the County. These lands are often privately held and have the potential to be developed by a landowner with or without the implementation of the proposed Project. The designation of wildlife corridors would be more appropriately

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	Basically, this means that plants need places to grow near wildlife corridors, that urban chokepoints (like concreted wildlife under-crossings) should be avoided where possible, corridors should not be part of brush management zones (since plants often do not survive being "brush managed"), habitat for pollinators and seed dispersers should be prioritized, and spraying of pesticides should be minimized or banned around critical corridors, so that plants can flower, be visited by healthy pollinators, set seed, and those seeds can spread. We suggest these ideas be incorporated into the Biology mitigation language.	included in habitat conservation plans, such as the South County Multiple Species Conservation Plan (SCMSCP) and the North County MSCP, which is currently under development. SEIR subsection 2.4.3.4 Wildlife Movement Corridors and Nursery Sites provides an analysis for how the proposed Project would impact wildlife corridors. This analysis concludes that the proposed Project would result in significant and unavoidable direct, indirect and cumulative impacts on wildlife corridors. SEIR subsection 2.4.4.1 includes mitigation measures and General Plan Policies to address impacts to Special Status Plant and Wildlife Species; it includes Policies COS-1.3, COS-1.6 through COS-1.11, COS-2.1, COS-2.2, LU-6.1 through LU-6.4, LU-6.6, LU-6.7, LU-10.2 and mitigation measures Bio-1.1 through Bio-1.7. Further, SEIR subsection 2.4.4.4 includes mitigation measures and General Plan Policies to address impacts to Wildlife Movement Corridors and Nursery Sites; it includes Policies COS-1.1 through COS-1.5, LU-6.1, LU-6.7 and mitigation measures Bio-1.1 through Bio-1.7 and Bio-2.3. Many of the commenter's concepts are included within these policies and measures.
S-8	• The GPA should clarify, both in the biology section (2.04) and especially the hazards section (2.06, p. 2.6-23 and elsewhere) that "flammable vegetation" is **not** synonymous with native plants. Research by CNPSSD chapter member Greg Rubin1 strongly suggests that native plants in the landscaping are *less* flammable than non-native landscape plants like rosemary, lantana, and eucalyptus. We urge the County to make this explicit, in order to break the unthinking prejudice caused by outdated ideas that landscaping with native species is dangerous to people due to the risk of "brush" fires. Properly designed and maintained native landscaping is extremely safe, and we want people to be able to use it.	This comment generally states that the Draft SEIR should be amended to further clarify that "flammable vegetation" is not synonymous with native plants. The County does not agree and no revisions to the Draft SEIR have been made for the following reasons. The General Plan already recognizes the importance of native vegetation, as evidenced by Policy COS-2.1, Protection, Restoration and Enhancement, which is recognized in SEIR subsection 2.4.4.1; however, its inclusion would not alter the results of the impact determination. In addition, SEIR subsection 2.6.4.7 Wildland Fires (page 2-6-23) includes General Plan Policies and mitigation measures intended to address wildland fires, and includes Policies LU-6.11, LU-11.2, S-3.1 through S-3.4, S-3.6, S-4.1, COS-18.3 and mitigation measures Haz-4.1 through Haz-4.4. These Policies and mitigation measures support fuel management / modification programs that balance the need to protect structures with the preservation of native vegetation. The programs, identified below, have been reviewed and coordinated with County Fire Authority • County Water Efficient Landscape Design Manual

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		o Appendix G provides a plant list that identifies ignition resistive plants, both native and non-native. (*Note: Species were cross checked with the California Native Plant Society when this manual was prepared*.) o Appendix H provides a list of plants to avoid. Two native species (sagebrush and chamise) are identified as undesirable and all others are non-native. • County web site includes a web page with a brochure titled Fire, Defensible, and You that identifies fire resistant landscaping. The Water Efficient Landscape Design Manual is being updated to be consistent with the County's recently approved amendments to the Water Conservation in Landscaping Ordinance. This update will include an update to the Design Manual's Appendix H to include all plant species listed in the Fire, Defensible Space and You brochure. (See also Response to Comment S-14.)
S-9	• We also strongly suggest that the County coordinate with local fire districts, the County Fire Authority, and CAL-FIRE, to determine whether the wildfire section in the document is up-to-date. We are hearing that major changes are being proposed (possibly to shift strategy from wide-scale clearances to fire-safe landscaping to protect live and property). *If* such changes are underway, the FCI GPA should mirror them, rather than using outdated guidance.	This comment generally requests the County coordinate with fire agencies to determine if the mitigation identified in SEIR subsection 2.6.4.7 Wildland Fires is "current." Staff confirmed with the County Fire Authority and determined that the wildfire section is up to date. The County disagrees with the comment that the current strategy is for "wide-scale clearances." SEIR subsection 2.6.4.7 includes mitigation measure Haz-4.3 to enforce and comply with the Fire Code. Below is an excerpt from Section 4907.2(a) of the County Consolidated Fire Code (see page 53), identifying the fuel modification requirements for a structure intended for human habitation. This requirement is consistent with the strategy being proposed by the comment. The 100 feet of defensible space is also consistent with the California Public Resources Code and the County is not aware of any proposed changes. "The area within 50 feet of a building or structure shall be cleared of vegetation that is not fire resistant and re-planted with fire-resistant plants. In the area between 50 to 100 feet from a building, all dead and dying vegetation shall be removed. Native vegetation may remain in this area provided that the vegetation is modified so that combustible vegetation does not occupy more than 50% of the square footage of this area."

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		The County Consolidate Fire Code is available at: http://www.sandiegocounty.gov/content/dam/sdc/dplu/docs/cosd-fire-code.pdf
S-10	• Brush management zones should not be included in conservation areas. Too often, development goes up to property lines, and adjacent conservation areas are expected to bear the brunt of brush management to protect the new development, even when this impacts conservation goals. Buildings should be set back from the wildland-urban interface, so that the brush management areas are completely within the property boundary; brush management should not be forced onto natural conservation areas because "managing" the brush reduces the value of the habitat. We suggest that Hazards Policy S-41 be amended to include language to this effect.	This comment generally recommends revising Policy S-4.1 to add language that brush management should not be forced into natural conservation areas. If a project is approved with Biological Open Space as a requirement for preservation or mitigation, then brush management activities (vegetation removal) are prohibited without direct written authorization from the local fire authority. Additionally, when defensible space is required for a project, that defensible space, typically 100-feet from habitable structures, is not included in the Biological Open Space. Therefore, the County does not agree the current Policy of S-4.1 warrants amendment. SEIR subsection 2.6.4.7 recognizes the potential impacts of extensive fuel modification around development in the WUI, as discussed in the fourth dot point, which determines that requiring extensive fuel modification "would be infeasible because it would substantially impact the environment by damaging biological resources." See also Response to Comment S-9.
S-11	The current draft is incomplete with regards to vegetation impacts. While it lists the acres of habitat that will be impacted, Table 2.4-1 needs three more columns. First, we need to see how many acres of that habitat are within the proposed FCI footprint.	The FCI Lands GPA is programmatic and not a true development proposal for which the County can determine the exact level of impact and mitigation. Nevertheless, in an effort to be responsive to the comment, SEIR Table 2.4-1 has been updated to include total acres of vegetation under each vegetation category within the Project areas. The additional information merely clarifies and does not change the impact determination or cause additional mitigation to be developed.
S-12	Second, we need to see how many of those acres are available for mitigation, and	This comment requests an accounting of acres of each vegetation type available for mitigation. The FCI Lands GPA is programmatic and not a true development proposal for which the County can determine the exact level of impact and mitigation. Nevertheless, the following is provided in an effort to be responsive to the comment. The number of non-impacted acres within the Project area would be determined by subtracting from the total number of acres of each vegetation type shown in the updated SEIR Table 2.4-1. However, this calculation would

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		not account for opportunities for off-site mitigation which is permissible. All of the undeveloped land would be available for mitigation should the property owner choose to. Therefore, the County does not agree this information is necessary to determine the significance of impacts or feasible mitigation. The SEIR determined that the proposed Project's impacts to Special Status Plant and Wildlife Species (Section 2.4.3.1) and impacts to Riparian Habitat and Other Sensitive Natural Communities (Section 2.4.3.2) would be significant and unavoidable until habitat conservation plans are completed. See also Response to Comment S-11.
S-13	third, we need to see the mitigation ratio for each vegetation type, and ideally the total amount of acres that would need to be mitigated for each vegetation impact. Thus, we can determine which vegetation impacts the County can mitigate for using current or future mitigation banks, and which are significant, unavoidable impacts that cannot be mitigated. This information is critical to land use decisions going forward, and the FCI GPA is an ideal document in which to house this information.	This comment requests the mitigation for each vegetation type and the total number of acres that would be required to mitigate for each vegetation type. The FCI Lands GPA is programmatic and not a true development proposal for which the County can determine the exact level of impact and mitigation. Mitigation ratios for each type of vegetation within the approved MSCP Subarea are provided in Attachment M of the County Biological Mitigation Ordinance. The mitigation ratio also takes into account the quality of the vegetation (habitat) when determining the final mitigation ratio. The South County MSCP is currently the only approved MSCP within the Project area; therefore, these ratios would not apply to areas outside the South County MSCP. The mitigation ratios are applied to development projects, not to a "Program" such as the proposed Project. Table 2.4-1 provides the estimated impacted acres. Certainty in the acres of potential mitigation is not necessary to determine the significance of potential impacts to candidate, sensitive, or special status species.
S-14	Additionally, the County needs to help support monitoring of wildlands, especially wetlands, for new pests, pathogens, parasites, and invasive plants. Currently, this function is performed by a tiny staff of state agriculture specialists, contractors, personnel from various groups, and volunteers. Given the damage caused by newly spreading pests like the polyphagous shot-hole borer, which attacks many wetland trees *and* avocados and landscaping trees, the County needs to get involved in supporting efforts to detect, monitor, and control these problems, as existing	The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. The comment is generally discussing existing conditions; not the perceived impacts of the proposed Project. However, the County has provided a response to the concern below. The County Agriculture, Weights and Measures Department helps support the concerns raised by this comment by: • Ensuring the safe use of pesticides and investigate illnesses;

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	efforts are inadequate. We suggest that language to that effect be included both in the Biology section (2.04) and in the Hazard section (2.06), and we are happy to work with staff on wording, if desired.	• Preventing the establishment of pests that require pesticide controls, sting or severely injure people, or inhibit growing fresh nutritious fruits, vegetables and other plants; and • Promoting the use of effective biocontrol measures. However, the County does not have authority over privately-owned lands to monitor those lands for pests, pathogens and parasites. Section 2.4.4 of the SEIR includes mitigation to minimize impacts of invasive plants, as shown below. • **Policy COS-1.9**: Invasive Species. Require new development adjacent to biological preserves to use non-invasive plants in landscaping. Encourage the removal of invasive plants within preserves. • **Bio-2.1** Revise the Ordinance Relating to Water Conservation for Landscaping to incorporate appropriate plant types and regulations requiring planting of native or compatible non-native, non-invasive plant species in new development. The Water Conservation in Landscaping Ordinance was recently amended to be compliant with the State's Model Water Efficient Landscape Ordinance (MWELO). This Ordinance restricts plants types in fire prone areas and adjacent to native vegetation. This would be identified during review of discretionary project applications, along with any new construction where the landscaped area is 500 square feet or more in which the County issues a building permit. Invasive plantings adjacent to native species and those that may be transported through area storm drain outlets into adjacent open spaces are closely looked at during review. Fire prone vegetation adjacent to native open space areas is also restricted. Projects adjacent to MSCP Preserves go through the same level of review and concurrence between the staff landscape architect and biologists to ensure no invasive or fire prone vegetation will negatively impact adjacent habitats. (See also Response to Comment S-8.)
S-15	With regard to global climate change, we have the following concerns and suggestions: • As CNPS was a co-plaintiff in the *Center for Biological Diversity et al. vs. California Department of Fish and Wildlife and Newhall*	The Newhall Ranch Case does not restrict the County's use of 900 MT CO2e/year as a screening threshold to determine which projects do not pose a cumulatively considerable emission risk. The Newhall Ranch ruling does not disallow the use of the screening threshold as the comment claims. Please refer to Global Response 3 (GR-3) Global

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	Land and Farming Company case ("Newhall Ranch"), we have to note that this case must be included in any analysis of climate change impacts, as it restricts what both the County and applicants may do. Specifically, the County's use of "900 metric tons carbon dioxide equivalent per year (MT CO2e/year) screening level to determine the need for additional analysis of GHG [greenhouse gas] emissions from a project," (p. 2.15-11) is not explicitly allowed under the ruling, and it may well face a future court challenge.	Climate Change.
S-16	This is additionally true, because, per the County's 2015 *Recommended Approach to Addressing Climate Change in CEQA Documents*, it is allowable to "amortize" GHG emissions over a fifty year period. In practice, this means that projects that emit up to 45,000 MT CO2 the year they are built are proposed to have insignificant greenhouse gas impacts, because their emissions are amortized over 50 years and therefore considered to be (wrongly) insignificant in the year they are actually emitted. **We strongly urge the County to reconsider both its numerical threshold and especially amortizing emissions that will occur in a known year, to insure that this policy is consistent with the Newhall Ranch ruling**. This is an observation, not a threat. The County needs to insure that its guidelines can pass foreseeable legal challenges, so that project permits will not be invalidated by legal challenges to the way the County advises that greenhouse gas emissions are handled. Complying with the Newhall Ranch ruling is essential going forward.	The Newhall Ranch case underscores that GHG analysis, like all resource analyses, must include substantial evidence regarding the level of significance (impact significance) determination. Furthermore, the County's guidelines for addressing Climate Change were rescinded by the Board of Supervisors in June 2015. The County is currently working on developing interim guidance for a GHG Analysis Methodology in light of the Newhall decision, and that interim guidance is anticipated to be used until a Climate Action Plan is adopted by the County. Please refer to Global Response 3 (GR-3) Global Climate Change.

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S-17	• The County has missed one major source of CO2 emissions: cement manufacture. The manufacture of one MT of conventional Portland cement emits between 0.9 and 1.1 MT of CO2, and concrete can be up to 40% cement, although proportions vary substantially. **The County needs to include cement emissions in assessing impacts.** Methods for assessing emissions from cement production are available from the IPCC2 and many other sources. One benefit of considering cement emissions is that the industry is trying to decrease cement emissions. Accounting for them is one way to encourage adoption of materials that emit less (or even absorb!) greenhouse gases.	This comment suggests that the FCI Lands GPA SEIR needs to assess GHG emissions from cement manufacture. The County disagrees that cement manufacture emissions should be included in the SEIR Appendix F, GHG Emissions Calculations. While it is true that development of projects contemplated under the GPA is likely to require the use of cement, emissions associated with manufacture of cement that would ultimately be required for an individual land use development are considered part of a "lifecycle" emissions analysis. CEQA does not require a lifecycle analysis of a project's emissions. CEQA only requires analysis of impacts that are directly or indirectly attributable to the project under consideration (CEQA Guidelines, Section 15064(d).). "Lifecycle" emissions would refer to emissions beyond those that could be considered indirect effects of a project as that term is defined in CEQA Guidelines Section 15358. In some instances, materials may be manufactured for many different projects as a result of general market demand, regardless of whether one particular project proceeds. Thus, such emissions may not be caused by the project under consideration. The California Natural Resources Agency affirmed this in the Final Statement of Reasons for Regulatory Action supporting the Amendments to the State CEQA Guidelines Addressing Analysis and Mitigation of Greenhouse Gas Emissions Pursuant to SB97 (December 2009). The Agency states that a regulatory definition of the term "lifecycle" does not exist and even if a standard definition of the term existed, requiring such an analysis may not be consistent with CEQA for the reasons stated above. Moreover, cement manufacture facilities represent "covered entities" under California's Cap-and-Trade regulation and are subject to a specified emissions allowance and a declining emissions cap to reduce emissions in compliance with the State's GHG reduction goals. As such, any emissions from cement manufacture that ultimately supplies a project would be heavily regulated under the State's GHG reduction framework. No further analysis of such emissions is required in the Draft SEIR.
S-18	• We strongly urge the County to abandon the 50 year amortization concept for greenhouse gas emissions. The critical threshold is 2oC warming on average global temperatures, and	This comment urges the County to abandon the 50-year amortization period for GHG emissions. Project construction emissions are typically amortized for 20 years, not 50. If a project amortizes their construction

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	absent a major transformation of global civilization, we will pass that threshold in something like 20 years, not 50. At that point, the County faces major challenges. These include, in no particular order, loss of Colorado River water due to reservoir levels falling below intake pipes, loss of electrical power from Colorado River dams for the same reason, decreased water from California sources due to expected decade-long droughts (as we appear to be in now), major die-offs in agricultural crops, major die-offs of plants at the hotter ends of their geographic ranges, smaller and less predictable food supplies, and quite possible major human emigrations as San Diego becomes less hospitable.	emissions beyond 20 years, a rationale must be presented to substantiate the need and viability of the longer duration amortization. In addition, the County is not bound to a threshold of 2 degrees Celsius as a significance criterion for determining the severity of climate change impacts.
S-19	Unfortunately, many major developers and many planning groups view the transformation to a decarbonized society as a threat to their way of life, rather than as a wonderful business opportunity to get rich saving the world, while building a livable future through invention, design, public engagement, and innovation. While changing peoples' world-view is beyond the scope of any planning document, we hope that the County can embrace the future and the need to transform, rather than endlessly tinkering with increasingly outdated 20th Century notions of planned sprawl that are increasingly maladaptive in our changing world. This is not to say that the FCI GPA should be thrown out, but we hope that the people involved in it can be encouraged to embrace both present reality and future challenges, rather than trying to replicate the worn-out plans of the past.	The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
S-20	Thank you for the opportunity to comment on the FCI GPA. If you have any questions, comments, or concerns, please contact Frank Landis at 310-883-8569 (cell) or conservation @cnpssd.org. Please keep us informed of all future announcements, meetings, and documents related to this project.	This comment provides concluding remarks; a response is not required.

Responses to Comment Letter T
Shute, Mihaly & Weinberger (Cleveland National Forest Foundation)
February 29, 2016

	Comment	Response to Comment
T-1	We submit this letter on behalf of the Cleveland National Forest Foundation ("CNFF"), which promotes sustainable regional land use planning in order to stem the tide of urban encroachment into San Diego's backcountry. On behalf of CNFF, we submit these comments on the Recirculated Draft Supplemental Environmental Impact Report ("RDSEIR") for the Forest Conservation Initiative General Plan Amendment ("Project" or "FCI Amendment").	This comment is an introduction to comments that follow. No further response is required.
T-2	For all the reasons set forth below, it is our opinion that the RDSEIR does not comply with the requirements of the California Environmental Quality Act ("CEQA") (Public Resources Code section 21000 *et seq.*) and CEQA Guidelines (California Code of Regulations, title 14 section 15000 *et seq.*).	This comment is further introduction to comments that follow. No further response is required.
T-3	The Forest Conservation Initiative is a voter approved initiative that required 72,000 acres of backcountry lands within the Cleveland National Forest to be designated with minimum lot sizes of 40 acres. Since the sunset date of the FCI Initiative, CNFF and Save Our Forest and Ranchlands ("SOFAR") have submitted comments to the County on previous iterations of this EIR that pointed out the documents' inadequacies. Unfortunately, this document perpetuates many of its predecessors' flaws, particularly its failure to adequately analyze and mitigate the Project's severe climate impacts and its treatment of alternatives to the proposed Project.	The County recognizes that CNFF submitted comments on the previous iteration of this Draft SEIR circulated for review in 2013. As detailed in the Reader's Guide for Recirculation, comments on the 2013 Draft SEIR will not be responded to as the current Draft SEIR was updated. The County appreciates the comments received on the current Draft SEIR. However, the County does not agree that the current Draft SEIR is inadequate as it does contain an analysis of the potential impacts of climate change within subsection 2.15 and a reasonable range of alternatives have been developed and analyze within Chapter 4, Project Alternatives.
T-4	The proposed Project, in effect, expands the Village land use designations (formerly known as "country town" designations) outside of the established boundaries for the Village areas. Implementation of the Project will allow development to further encroach into stressed, fragile ecosystems within the Cleveland National Forest. This encroachment is not justified, especially given that the RDSEIR itself identifies the Modified FCI Condition alternative as reducing encroachment into forest areas and as environmentally superior. See RDSEIR at S-7 and 4-2.	This comment generally states the commenter's interpretation of the proposed Project; however, it does not make specific contentions regarding the substantive analysis within the Draft SEIR. Nevertheless, the County has responded to this comment below. The proposed Project does expand Village land use designations outside current Village boundaries in Ramona, Descanso and Alpine. However, the County does not agree that this expansion of Village designations is not justified. In both Ramona and Descanso, the Village land use designations reflect existing parcels sizes and do not allow any further

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		subdivision potential. In Alpine, the expansion of Village land use designations would create a more self-sufficient village with a population that can support a wider range of employment opportunities and services. The Village expansion primarily supports Project objectives as discussed below. • *Promote sustainability by locating new development near existing infrastructure, services, and jobs* – The proposed Alpine village expansion is proposed along the Interstate 8 corridor directly east of where services and jobs are already located, and to the east of the Viejas retail and gaming complex, a major employer for the area. • *Reinforce the vitality, local economy, and individual character of existing communities while balancing housing, employment, and recreational opportunities* – The proposed expansion of the Alpine Village will allow for the provision of a wider range of services, including a new high school, which will contribute to a more complete and self-sufficient community. • *Maintain environmentally sustainable communities and reduce greenhouse gas emissions that contribute to climate change* – The expansion of the Alpine Village will contribute to development of a more multi-modal transportation network and allow for a more complete and self-sufficient community, as discussed above, both of which will contribute to a reduction in vehicle miles traveled. The FCI Lands GPA does not propose land uses within the Cleveland National Forest (CNF). Uses resulting from the GPA may cause activities that encroach into off-site (non-Project areas) areas; potential indirect effects caused by the GPA are analyzed throughout the SEIR wherein potential impacts are disclosed and General Plan Policies and mitigation measures are identified. See Responses to Comments R-16, R-17, R-18, and O-8. It should also be noted that the Modified FCI Condition alternative also contains the proposed expansion of village land use designations.
T-5	We see no reason why the County should be considering the proposed Project when there is clearly an environmentally superior option. New development can and should be accommodated inside the Village designated areas so that open space and forest land values can be	This comment generally reflects the commenter's preference of an alternative that should be implemented; however, it does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. Nevertheless, the County has responded to this comment below.

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	preserved.	The Draft SEIR acknowledges that the Modified FCI Condition Alternative would reduce potential impacts when compared to the proposed Project, as it would accommodate less development than the proposed Project and all of the other alternatives, thus decreasing environmental impacts in all issue areas evaluated in Chapter 2.0 of this SEIR. See Responses L-3, L-4, and GR-1. The Modified FCI Condition alternative proposes reduced density designations in Alpine, both east of the Village and in the Japatul Valley area (SEIR Figure 4-1.1A), Cuyamaca (SEIR Figure 4-1.3), Descanso (SEIR Figure 4-1.4), Jamul (SEIR Figure 4-1.6), Julian (SEIR Figure 4-1.7), Lake Morena (SEIR Figure 4-1.8) and Palomar Mountain (SEIR Figure 4-1.10). As shown in SEIR Table 4-4, the lower density designations proposed by the Modified FCI Condition would reduce the potential buildout of the land use map by 1,724 dwelling units, 1,683 of which are located in Alpine, where the proposed Project would expand the Alpine Village in support of the Project objectives discussed in Response to Comment T-4. In all other communities (totaling 57,967 acres), which are the more remote and in closer proximity to CNF lands than Alpine, the proposed Project would result in a potential buildout of 41 more dwelling units than the Modified FCI Condition alternative. The proposed Project reflects stakeholder consensus after considering the recommendations and interests of a wide range of stakeholders.
T-6	As previously submitted, CNFF requests that the County create a "forest" designator overlay district that would apply to all lands regardless of parcel size within the FCI planning area. See September 16, 2014 letter from SMW to B. Citrano and M. Fogg, attached as Exhibit A. As you know, CNFF supports minimum parcel sizes of at least 40 (or 80) acres outside country towns (villages) to protect forest values. The "forest" designator would serve as a "red flag" for landowners that seek to develop or subdivide properties in excess of the adopted FCI Amendment land use designations. The "forest" designator is fully consistent with the San Diego County Guiding Principles and would specifically reinforce Guiding Principles 2 (compact development within Village boundaries), 3 (vitalize existing communities), 4 (habitat protection), 5 (wildfire risk), 6 (promote	This comment proposes a "forest" designator overlay district for all lands within the FCI planning area. This comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. Nevertheless, the County has responded to this comment below and it will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. It is acknowledged that CNFF has previously proposed the creation of a "forest" designator overlay district that would apply to all FCI Project areas. It is not clear from this comment as to what impacts would be reduced or mitigated through the application of this overlay; regardless of a "forest overlay", future development within the FCI Project areas would still meet all applicable County building codes and development regulations and standards.

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	public transportation), 7 (reduce greenhouse gas emissions), 8 (preserve agriculture), and 9 (reduce infrastructure costs).	
T-7	This Project will have long-term consequences for the residents of San Diego County's backcountry and for the ecological health of the Cleveland National Forest. Those consequences include permanent loss of open space, increased edge effects, significant increases in traffic congestion, and increased air pollution and greenhouse gas emissions ("GHG"). Yet, this RDSEIR fails to adequately analyze and mitigate these significant impacts.	Please see Global Response 3 (GR-3). The County does not agree that the Draft SEIR failed to adequately analyze the significant impacts identified in this comment; feasible mitigation has been identified and for some resource subjects the impacts are considered less than significant, for other resources, the impacts cannot be mitigated to a level of less than significant. Please refer to SEIR Table S-2 for a summary of impacts, applicable General Plan policies and feasible mitigation measures and the resulting impact after consideration of these policies and mitigations. The following identifies where these impacts are analyzed in the Draft SEIR for the resources addressed in this comment: • *Permanent loss of open space* — The former FCI lands are privately-owned lands, not open space. Therefore, the proposed Project would not result in any loss of open space. However, the Draft SEIR did analyze impacts to agriculture lands and forest resources in subsection 2.2.3.2, Conflicts with Agricultural or Forest Lands. In addition, the impacts to agriculture and forest resources are analyzed in Chapter 4 (see Table 4-6. Comparison of Alternatives – County Identified Agricultural Lands and Impact Estimates and Table 4-7. Comparison of Alternatives – Proposed Land Uses in Forest Resources). The mitigation for those impacts is identified in SEIR subsection 2.2.4. In subsection 2.2.4.4, the Draft SEIR determined that even with implementation of the applicable mitigation measures any direct conversion of forestry resources due to private development of parcels within the Project areas addressed in this SEIR would remain significant and unavoidable. • *Increased edge effects* — Impacts to edge effects are addressed in Draft SEIR subsection 2.4.3.2 (*refer to last paragraph on page 2.4-5*). Project alternatives are analyzed in Chapter 4 (see Table 4-9 Biological Resources Impacts Comparison). In addition, Policies identified on pages 2.4-10 to 2.4-11 and 2.4-13 require monitoring, management and maintenance of regional preserve systems to help minimize edge effects. Mitigation measure Bio-1.7 specifically addresses edge effects (see page 2.4-12).

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		As discussed in subsection 2.4.3.2 (page 2.4-4), impacts to Riparian Habitat and Other Sensitive Natural Communities would be reduced through the implementation of a combination of mitigation measures and implementation programs identified in the General Plan Update PEIR; however, not to a level of insignificance. • *Traffic congestion* — The Draft SEIR uses level of service (LOS) as a means to analyze traffic congestion impacts. LOS impacts are analyzed in subsection 2.13.3.1 and shown in Tables 2.13-1 through 2.13-7, as well as in Appendix D Technical Memorandum: Traffic Impact Assessment Comparison of Traffic Impacts:2015 to 2012 Proposed Projects. In addition, traffic impacts for the Project alternatives are analyzed in Chapter 4, Table 4-12, as well as Appendix E Technical Memorandum: Traffic Impacts- Comparison of SEIR Alternatives. Policy M-1.2 is identified in the Draft SEIR to reduce traffic congestion, along with regulations intended to require projects to provide adequate off-street parking and loading, thereby reducing traffic congestion (see page 2.13-9). As shown in the analysis within subsection 2.13.3.1 Traffic and LOS Standards, the Draft SEIR analysis determined that Alpine would be the only community with a potential for significant traffic-related impacts (see page 2.13-3, last paragraph). • *Air quality* — Impacts to air quality are analyzed in the Draft SEIR in subsections 2.3.3.1 Air Quality Plans, 2.3.3.2 Air Quality Violations, 2.3.3.3 Non-Attainment Criteria Pollutants and 2.3.3.4 Sensitive Receptors, along with Appendix C Air Quality/Global Climate Change Analysis. In addition, air quality impacts for the Project alternatives are analyzed in Chapter 4, Table 4-8, Area-Wide and Mobile Source Emissions Alternatives Comparison. The Draft SEIR subsections 2.3.3.2, 2.3.3.3 and 2.3.3.4 determined that impacts would be reduced through regulations, County policies and mitigation measures/implementation programs; however, even with these programs in place, the impacts would not be reduced to below a level of significance because future development would exceed established quantitative screening-level thresholds (SLTs).

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		• *Greenhouse gas (GHG) emissions* — Impacts from GHG emissions are analyzed in the Draft SEIR subsections 2.15.3.1 and 2.15.3.2. In addition, impacts from GHG emissions by Project alternatives are analyzed in subsections 4.2.2.15 (Modified FCI Condition), 4.3.2.15 (Mid-density), 4.4.2.15 (Alpine Alternative Land Use Map) and 4.5.2.15 (No Project). Please see Global Response 3 (GR-3). The Draft SEIR subsection 2.15.3.1 determined that because development would generate substantial GHG emissions, regardless of the land use map alternative ultimately approved by the County, and because it currently cannot be known if the Project would comply with GHG targets after 2020 in the range of an additional 40 to 80 percent reduction, the potential exists that post-2020 emissions may contribute considerably to cumulative carbon emissions that promote further climate change; therefore, this impact would be potentially significant and unavoidable. See Global Response 3 (GR-3).
T-8	Moreover, prolonged drought conditions have exacerbated limited water supplies in the backcountry. Despite these changed circumstances, the RDSEIR relies on the General Plan EIR's analysis of water supply impacts and fails to analyze current conditions.	Although the Draft SEIR does partially rely on the analysis within the General Plan EIR for the issue of water supply, it includes updated information related to this issue. The Draft SEIR subsection 2.7.3.2 determined that implementation of the proposed Project would result in significant and unavoidable direct and cumulative impacts related to groundwater supplies and recharge. Figure 2.7-2, based on 2014 data, shows areas with Potential Low Well Yields that reflect similar conditions of the current extended drought conditions and are located in groundwater dependent areas. The Draft SEIR subsection 2.7.3.2 recognizes that the Project areas are located where groundwater supplies are already depleted (see second paragraph on page 2.7-5). Additionally, the General Plan Update PEIR (subsection 2.15.4.2) recognized the currently limited water supply infrastructure that will result in impacts to water supply. Impacts from limited water supply are expected to be more severe for the FCI Lands GPA proposed Project as compared to the 2011 General Plan due to the proximity of the FCI Lands Project areas and surrounding sensitive natural resources (*see last paragraph on page 2.15-31 of the SEIR*).

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T-9	**The RDSEIR Fails to Adequately Analyze or Mitigate Climate Change Impacts.** The FCI Amendment would accommodate 6,245 new units at build-out, which would significantly increase the population in San Diego's backcountry. RDSEIR at 1-15. It is therefore unsurprising that the RDSEIR concludes that the Project will have a significant effect on climate change. RDSEIR at 2.15-16 and 2.15-20. With this significance determination comes CEQA's mandate to adopt feasible mitigation measures that would reduce or avoid the impact. CEQA Guidelines § 15126.3(a)(l); see also *Woodward Park Homeowners Ass'n, Inc. v. City of Fresno* (2007) 150 Cal. App. 4th 683,724 ("The EIR also must describe feasible measures that could minimize significant impacts."). Under CEQA, "public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects." *Berkeley Keep Jets Over the Bay Comm. v. Bd. of Port Comm'rs* (2001) 91 Cal.App. rh 1344,1354 (quoting Pub. Res. Code § 21002). Accordingly, CEQA requires lead agencies to identify and analyze all feasible mitigation, even if this mitigation will not reduce the impact to a level of insignificance. CEQA Guidelines Section 15126.4(a)(l) (A) (discussion of mitigation "shall identify mitigation measures for each significant environmental effect identified in the EIR").	The comment is correct that full buildout of the Project area under the proposed Project would result in 6,245 potential dwelling units. However, Table 1-1C has been added to the SEIR Chapter 1 to show that of the 6,245 potential dwelling units, only 2,470 of those dwelling units would result from the potential subdivision of existing parcels. The remaining 3,775 of potential dwelling units would be located on existing parcels that are either already developed or would have the same potential to develop with or without the FCI Lands GPA. Table 1-1C further shows that, when the Alpine CPA is removed from consideration, there are only 245 potential additional lots available through subdivision in the remainder of the Project area (56,738 acres). The County does not consider the Alpine CPA part of the "backcountry", as referenced in this comment. The Alpine CPA is bisected by Interstate 8, supported by a mixed-use Village with urban densities and contains additional urban-level development on the Viejas Reservation. Most of the additional development capacity in the Alpine CPA for the proposed Project would be located as a linear continuation of the Alpine Village along Interstate 8 and in the vicinity of the urban level development on the Viejas Reservation. Applicable General Plan Polices and feasible mitigation measures that address climate change are found within subsection 2.15.4, which also includes the identification and evaluation of additional mitigation measures that have been determined to be infeasible.
T-10	Here, the RDSEIR's analysis of the Project's impacts on climate change fails to meet the requirements of CEQA because it fails to propose feasible mitigation measures to reduce the Project's significant impacts on climate change. Instead, the RDSEIR states that there are no feasible mitigation measures beyond the General Plan policies already identified. RDSEIR 2.15-16 and 2.15-17. This is simply not true. Because the Project's GHG emissions will cause a significant impact, the RDSEIR must analyze, and the County must adopt, *all* feasible mitigation to reduce those impacts.	The County does not agree with the comment. Applicable General Plan Polices and feasible mitigation measures that address climate change are found within subsection 2.15.4, which also includes the identification and evaluation of additional mitigation measures that have been determined to be infeasible. The Draft SEIR determines and discloses there are no feasible mitigation measures beyond General Plan policies already identified. On page 2.15-17, the Global Climate Change chapter states that additional feasible mitigation measures cannot be identified at this time, not that there are none available. The rationale provided in this chapter is that important factors, including the cost and feasibility of mitigation actions needed to comply with future policies, are currently unknown, such as:

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		• GHG emission reduction targets in effect at the time that subdivision maps are submitted for approval; • The effectiveness of regulatory actions already adopted as part of the implementation of the Global Warming Solutions Act of 2006 (AB 32); and • The potential for new regulations and their effectiveness related to statutes enacting GHG reduction targets (similar to the current goals in adopted Executive Orders). The County does not agree that the Draft SEIR analysis of Project impacts on climate change fails to meet CEQA requirements because it fails to propose feasible mitigation measures. On September 8, 2016, the California Governor approved Senate Bill 32 (SB 32) which reflects the GHG emission reduction target found in Executive Order B-30-15 and calls for the reduction of statewide emissions to 40% below the 1990 level by 2030. Because this reduction goal mirrors the executive order and the County's analysis anticipated the emission reduction requirement becoming law, the Global Climate Change analysis found in Chapter 2.15 of this SEIR and the associated Appendix F, Greenhouse Gas Emissions Calculations, do not require updating. The analysis was conducted to determine impact significance for the buildout year of 2030 with the significance criteria of 40% of statewide emissions below 1990 levels by 2030. In subsection 2.15.4.1, on pages 2.15-25 to 30, the Draft SEIR explains why specific Project-level mitigation is not feasible due to its social and economically inequitable implementation and because it conflicts with the Project objective to minimize public costs and infrastructure. The overall reduction in residential development potential of the proposed Project will result in reduced GHG emissions compared to current land use designations, regardless of imposed mitigation. Please see Global Response 3 (GR-3).
T-11	The RDSEIR concedes that the Project "would generate a substantial amount of emissions over baseline conditions." RDSEIR at 2.15-14. The RDSEIR reveals that GHG emissions at build-out will increase to 178,534 million metric tons of carbon dioxide equivalent (MMT CO2e) annually. The RDSEIR also concedes that the proposed Project "would	Please see Response to Comment T-10 above. Applicable General Plan Polices and feasible mitigation measures that address climate change are found within subsection 2.15.4, which also includes the identification and evaluation of additional mitigation measures deemed infeasible.

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	not meet the GHG standard necessary to comply with the 2020 statewide GHG emissions target" and "it is likely that the Project would not feasibly attain future GHG reductions needed to avoid the most severe climate impacts." RDSEIR at 2.15-17. Yet, despite the shocking increase in GHG emissions, and acknowledgement that implementation of the Project would mean that GHG targets will not be met, the RDSEIR fails to identify *any* feasible measures to reduce emissions beyond policies already in place. RDSEIR at 2.15-16 and 2.15-17.	
T-12	Instead the RDSEIR implies that the County is excused from requiring more measures to reduce the Project's GHG emissions because the GHG emissions reduction goals are only achievable if state and federal authorities adopt new regulations and new technologies are developed.	The County does not agree with the comments' characterization of the information contained in the Draft SEIR relating to feasible mitigation and General Plan Polices concerning Climate Change. Please see Global Response3 (GR-3) and Response to Comment T-10. Applicable General Plan Polices and feasible mitigation measures that address climate change are found within subsection 2.15.4, which also includes the identification and evaluation of additional mitigation measures deemed infeasible.
T-13	*Id.* However, the California Air Resources Board's ("CARB") updated Climate Change Scoping Plan relies on local government actions to "plan and build communities to reduce vehicular GHG emissions and provide more transportation options" as a key strategy to reduce the state's GHG emissions from transportation systems—which comprise a full 36 percent of total state emissions. Exhibit B, at p. 46. CARB also notes that "[t]he success of efforts to reduce GHG emissions within other economic or resource sectors such as water, energy, and transportation will be greatly improved by a transition to more sustainable land use practices in the years ahead." *Id*. at 104. Given CARB's reliance on local GHG reduction efforts, the RDSEIR may not conclude, as it does, that the ability of the proposed Project to achieve goals beyond 2020 is out of the County's control. RDSEIR at 2.15-16. *See Sierra Club v. Cnty. of San Diego,* (2015) 231 Cal.App.4th 1152, 1168 ("without local measures the requirements of Assembly Bill No. 32 will not be met").	The Draft SEIR does not state that ability of the proposed Project to achieve goals beyond 2020 is out of the County's control as claimed by the comment. Page 2.15-16 of the Draft SEIR states that the ability to achieve goals past 2020 is *partially* out of the County's control at the individual project level because a specific project-level reduction target has not been adopted by the State Legislature. In the last paragraph on Draft SEIR page 2.15-15, the Draft SEIR states that "[n]ew legislation is proposed to establish post-2020 goals. On September 8, 2016, the California Governor approved Senate Bill 32 (SB 32), which reflects the GHG emission reduction target found in Executive Order B-30-15 (see also Response to Comment T-10)." As stated in the last paragraph on page 2.15-16, "[i]mplementation of General Plan policies and mitigation measures from the General Plan Update PEIR would reduce the Project's GHG emissions beyond 2020, but not below a level of significance." Please see Global Responses 3 (GR-3) and Response to Comment T-10. The County does not agree that local measures are not being pursued to

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		meet the requirements of AB 32. As discussed on page 2.15-29, second to last paragraph, the "…County is undertaking the preparation of a Climate Action Plan (CAP) that will address long-term GHG emissions county-wide." The CAP is anticipated to provide streamlining opportunities for projects that are determined to be consistent with a "plan for the reduction of greenhouse gases."
T-14	Accordingly, the County may not avoid mitigating for Project's significant impacts related to GHG emissions. The RDSEIR must be revised to include feasible mitigations (such as requiring project specific reductions) that result in a demonstrable reduction in emissions.	Please see Global Response 3 (GR-3). Applicable General Plan Polices and feasible mitigation measures that address climate change are found within subsection 2.15.4, which also includes the identification and evaluation of additional mitigation measures deemed infeasible. See Responses T-10 through T-13. Also, as discussed at the end of Draft SEIR page 2.15-29, "…[i]mplementation of the proposed Project will reduce the GHG emissions in comparison to the current land use designations."
T-15	The RDSEIR dismisses potential mitigations by claiming that they are infeasible. However, the RDSEIR fails to provide evidence for these claims. For example, the RDSEIR states that mitigation requiring project-specific reduction percentages would be infeasible in part because the required reductions "would add development costs and requirements, which *could potentially* make development, although allowed by the Land Use Map, infeasible." RDSEIR at 2.15-28 and 29; emphasis added.	The County does not agree that the Draft SEIR does not provide evidence for why specific potential mitigation is infeasible. See Response to Comments T-10 through T-13. Subsection 2.15.4.1, pages 2.15-26 through 2.15-30, provide detailed information showing how requiring Project-specific requirements would be inequitable as it would unfairly place restrictions on parcels only within the Project area; where the proposed Project assigns land use designations to 95% of parcels that either retain existing, or reduce land use intensities. Please see Global Responses 2 and 3 (GR-2, GR-3).
T-16	The RDSEIR provides no evidence to support this statement. It includes no feasibility studies or cost-benefit analyses indicating that implementing such requirements would in fact be infeasible.	The County does not agree that the Draft SEIR does not provide evidence to support the quoted statement. Draft SEIR subsection 2.15.4.1 (pages 2.15-26 through 2.15-30) provides detailed information showing how requiring Project-specific requirements would be inequitable as it would unfairly place restrictions on parcels only within the Project area. For example, the following measure was proposed but ultimately determined to be infeasible: "Require both discretionary and ministerial projects, within the FCI Project areas, to exceed 2013 Title 24 building standards and other GHG emission reduction design features to meet quantitative reduction targets consistent with California GHG reduction goals." The Draft SEIR states that the measure was determined to be infeasible

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		due to its social and economically inequitable implementation, and because it conflicts with the project objective to minimize public costs and infrastructure: Current land use designations for the FCI lands (the No Project alternative) are projected to result in 15,094 dwelling units. The proposed Project land use designations are projected to result in 6,245 dwelling units. The reduction in dwelling units (8,849 fewer dwelling units at buildout of the land use maps) that result from the proposed Project General Plan Amendment is unique in this regard because most GPAs seek to increase development potential. The Draft SEIR provides additional supporting evidence and ultimately concludes that the overall reduction in residential development potential of the proposed Project will result in reduced GHG emissions compared to current land use designations, regardless of imposed mitigation. Applicable General Plan Polices and feasible mitigation measures that address climate change are found within subsection 2.15.4, which also includes the identification and evaluation of additional mitigation measures deemed infeasible.
T-17	Next, the RDSEIR states that effective mitigation to reduce GHG emissions to a less than significant level for horizon years of 2030 and 2050 would need to be implemented for *all* projects, which would not be feasible. RDSEIR at 2.15-29; emphasis added. But this statement too is unsupported.	The comment does not accurately reflect the narrative in the Draft SEIR; in the first key-point under Policy LU-1.9 on page 2.15-29, the Draft SEIR reads: "*Effectual mitigation to reduce GHG emissions to less than a significant level for the horizon years of 2030 and 2050 would need to be implemented for all projects within the Project areas, even those discretionary development applications (applications) that would normally be processed as ministerial actions. Furthermore, the State has not established a 'project-level emission reduction' threshold to determine the project-specific emission reduction percentage necessary for individual projects to meet the 2030 statewide emission reduction target of 40% below 1990 emissions."* The point discloses the lack of a state-directed project-level emission reduction target; it does not make a feasible or infeasible determination, although implementation of mitigation that has not yet been developed or evaluated would appear to be infeasible. Ministerial actions are not required to prepare a climate change analysis and are not subject to the same review requirements as subdivision applications. Therefore, it would be infeasible and inequitable to subject

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		ministerial actions to more restrictions or regulations than comparable applications located outside the FCI Project areas. Table 2.15-5 is included in the Draft SEIR to show the types of projects that would typically require a climate change analysis. According to Table 2.15-5, the only projects that require a climate change analysis are single family developments of 50 or more units, multifamily of 70 units or more and commercial office projects 6,300 square feet or more. Table 2.15-6 shows that, within the Project areas, only five parcels for single family and three parcels for multifamily residential would be required to prepare a climate change analysis. See Global Response 3 (GR-3).
T-18	First, as stated above, CEQA requires lead agencies to employ all feasible mitigation measures that would lessen impacts even if the impacts are not reduced to less-than-significant levels. CEQA Guidelines § 15091(a)(1); *see also id.* § 15126.2(b) (requiring an EIR to discuss "any significant impacts, including those which can be mitigated but not reduced to a level of insignificance." "A mitigation measure may reduce or minimize a significant impact without avoiding the impact entirely." 1 Stephen Kostka & Michael Zischke, Practice Under the California Environmental Quality Act § 14.6 (2d ed. 2008).	The comment accurately states pertinent CEQA Guidelines related to feasible mitigation. The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
T-19	Second, the RDSEIR provides no basis for its statement that mitigation would need to be implemented for all projects, including ministerial actions. *Id.*	Please refer to Response to Comment T-17; see Global Response 3 (GR-3). The County does not agree with this comment. In subsection 2.15.4.1, Table 2.15.6 identifies the number of parcels what would trigger the need to prepare a climate change analysis under five development scenarios: (1) single family residential, (2) multifamily residential, (3) general commercial/office, (4) retail space and (5) supermarket/grocery space. The table shows that, at most, the land use designations assigned by the proposed Project would only trigger a climate change analysis and potentially require additional mitigation on 86 of 4,083 parcels, based on the 900 metric ton screening level from the California Air Pollution Control Officers Association (CAPCOA) white paper. According to the CAPCOA white paper, the 900 metric ton screening level would capture more than 90% of development projects, allowing for mitigation towards achieving the State's GHG reduction goals (refer to the first paragraph on page 2.15-27).

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T-20	While requiring identical mitigation for all projects may be preferable from a policy standpoint, the County may certainly impose different forms of mitigation for different types of development. In fact, such an approach makes sense in particular here, when protection of the County's most precious resource, the Cleveland National Forest, is at stake.	This comment generally states the commenter's preference for mitigation, but does not specifically identify what that mitigation is or what impacts it would reduce, nor does it raise any issues concerning the sufficiency of the Draft SEIR's analysis. Nevertheless, the County has responded to this comment below and it will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. The Draft SEIR recognizes that the CNF is a precious resource and this recognition is reflected in the low density land use designations assigned under the proposed Project. See Responses R-16, R-17, R-18, and O-8. SEIR subsection 2.15.4.1, pages 2.15-26 through 2.15-30, provide detailed information showing how requiring Project-specific requirements would be inequitable as it would unfairly place restrictions on parcels only within the Project area; where the proposed Project assigns land use designations to 95% of parcels that either retain existing, or reduce land use intensities as compared to current land use designations. Please see Response T-15 and Global Responses 2 and 3 (GR-2, GR-3).
T-21	The RDSEIR points to the fact that the County is undertaking the preparation of a Climate Action Plan (CAP) that will address long-term GHG emissions County-wide. RDSEIR at 2.15-29.	The comment correctly states that the County CAP is currently under development.
T-22	The RDSEIR implies that because the CAP will address future impacts related to GHG emissions, this EIR's failure to do so is excused.	The County does not agree with this comment. The Draft SEIR does not excuse the County from addressing impacts from GHG emissions. Potential impacts of Climate Change are disclosed and General Plan Polices and feasible mitigation measures are identified in subsection 2.15 of the Draft SEIR. Please see Response to Comments T-7, T-10, T-13 through T-15 and Global Response 3 (GR-3).
T-23	*Id.* First, it is unclear why the County is moving forward with this General Plan Amendment prior to preparation of a revised CAP. Given that the Project will result in substantial increases in GHG emissions, the County should postpone consideration of this Project until a CAP is prepared that identifies feasible measures that result in meaningful emissions reductions on FCI lands and beyond.	This comment generally discusses the commenter's opinion as to why the Draft SEIR should not have been released, but it does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. Nevertheless, the County has responded to this comment below and it will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. The preparation of land use maps and environmental analysis thereof

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		began just after the County CAP was adopted in June 2012. The FCI Lands GPA Notice of Preparation was circulated from 8/30/12 through 9/28/12, subsequent to CAP adoption. The County CAP approval was set aside in April 2013, which the County appealed. In March 2015, the County learned that the appeal would not be heard by the State Supreme Court, over a year after the formal start of the environmental analysis of the FCI Lands GPA. Contrary to the comment, the County began the process of amending the land use designation of the FCI Lands GPA Project areas while a CAP was in place. See subsection 2.15.2.3 for the full discussion of the timing of the CAP and the FCI Lands GPA initiation.
T-24	However, in the absence of a CAP, the County should consider other measures to reduce GHG emissions. For example, The County could impose a moratorium on the development of FCI lands until a CAP is adopted. The County could impose 80-acre minimum parcel sizes outside the Village designated areas and direct more dense development to the more urbanized villages.	The comment proposes two County actions that are inconsistent with CEQA Guideline 15126.6 which requires the description of a reasonable range of alternatives (or measures) that would feasibly attain most of the basic project objectives and would also avoid or substantially lessen any of the significant effects of the Project. The first suggested action is the imposition of a building moratorium until the County CAP is adopted for the FCI Lands GPA Project areas. A moratorium would not be consistent with any of the Project objectives. Further, within Chapter 4 of the Draft SEIR, the considered but rejected "Reduced Development/No Build Alternative" was analyzed. The second suggested action is the designation of all FCI Project areas with Rural Lands 80 land uses. This suggestion too is inconsistent with the basic objectives of the FCI Lands GPA, particularly the designation of land uses consistent with the Community Development Model. The arbitrary designation of FCI Lands GPA Project areas with RL-80 designations is similar to the considered but rejected "FCI Density Alternative" which arbitrarily places RL-40 designations on parcels within the Project areas. Delaying consideration of the Project until a CAP is adopted would continue to allow for more development potential than would be allowed once the proposed Project or any of the project alternatives are adopted. Please see Global Responses 2 and 3 (GR-2, GR-3).

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T-25	Alternatively, the County could implement interim policies that apply to development on FCI lands until a CAP is adopted. Given the changed circumstances of prolonged drought conditions, limited water supplies, and increased wildfire risk, the County has every reason to give serious consideration to these mitigation measures.	The suggested interim measures aimed at reducing GHG emissions are addressed in Response to Comment T-24. Given two Project alternatives, as described in Chapter 4 of the Draft SEIR, specifically the "Reduced Development/No Build Alternative" and the "FCI Density Alternative" were considered and analyzed, but found infeasible, the County contends that the potential suggested action proposed by the comment were seriously considered.
T-26	Furthermore, the County has not demonstrated that the General Plan Measures the RDSEIR relies on can be enforced or will result in necessary emissions reductions, in violation of CEQA's requirements for enforceable and efficacious mitigation measures.	The County does not agree with the comment that the General Plan Policies and mitigation measures are not enforceable and do not result in GHG emission reductions. As identified in subsection 2.15.4, there are many General Plan Policies and mitigation measures that are in effect and are reducing emissions. General Plan policies are also legally binding and development approvals must be consistent with those policies. The County is currently developing a Climate Action Plan that will apply throughout the entire unincorporated lands of San Diego County. See also Response to Comment T-28.
T-27	Mitigation measures proposed in an EIR must be "fully enforceable" through permit conditions, agreements, or other legally binding instruments. Pub. Res. Code § 21081.6(b); CEQA Guidelines § 15126.4(a)(2).	The comment accurately states pertinent CEQA Guidelines related to feasible mitigation. The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
T-28	The RDSEIR relies on a number of General Plan policies and measures to mitigate significant environmental impacts. *See*, for example, RDSEIR at 2.15-21-2.15-23. Many of these General Plan policies and programs are vague, optional, directory, or otherwise unenforceable.	Within the context of the FCI Lands GPA, General Plan Policies are analogous to project design features that are intended to address the potential for negative effects prior to environmental analysis, whereas mitigation measures are applied post-analysis in effort to address potential impacts. The comment seeks to require existing General Plan Policies to be subject to CEQA's requirements for mitigation measures, as set forth in Guideline 15126. The County does not agree this is an appropriate characterization of the policies, which are currently in place and are legally binding, and which apply to private lands within the unincorporated county. Moreover, the County does not agree that General Plan Policies are optional or unenforceable; however, they are not implemented in the same manner as mitigation measures which are captured in a Mitigation Monitoring or Reporting program consistent

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		with CEQA Guideline 15097. These Policies are implemented and enforced through the requirements in the Planning and Zoning Law that development approvals be consistent with the General Plan.
T-29	For example, the RDSEIR relies on General Plan Policy COS-20.2, which calls future preparation of a "program to monitor GHG emissions" as mitigation for any potential impacts related to GHG emissions. RDSEIR at 2.15-21. Because the RDSEIR fails to provide enforceable measures and performance criteria for the proposed measure, there is no assurance the climate change impacts would be mitigated at all. *See Sacramento Old City Ass'n v. City Council* (1991) 229 Cal.App.3d 1011.	Please refer to Response to Comments T-13 through T-15 and T-28; General Plan Policies are not mitigation measures. In addition, the Climate Action Plan (CAP) is undergoing development, as acknowledged within the Draft SEIR.
T-30	In another example, the RDSEIR relies on Mitigation Measure CC-1.1 which calls on the County to update the County Green Building Program to increase its effectiveness. RDSEIR at 2.15-22. But the RDSEIR fails to provide specific information on what elements of the program would be updated and how the update would result in reduced GHG emissions.	This comment is referencing a mitigation measure that requires the County to update the County Green Building Program. The Green Building Program offers incentives to promote energy efficiency, use of resource efficient construction materials, and water conservation in new and remodeled residential and commercial buildings. The Draft SEIR subsection 2.15.4.1 concludes that compliance with Mitigation Measure CC-1.1 will help the County achieve AB32 goals. Additional information on the Program is available on the County web site at: http://www.sandiegocounty.gov/content/dam/sdc/dplu/docs/pds273.pdf The progress in updating this Program is outlined in the Annual General Plan Progress Reports, which are also available on the web site at: http://www.sandiegocounty.gov/content/sdc/pds/generalplan.html Some improvements to the Program, as reported in these annual reports, include: • 2012 – Updated with incentives to reduce plan check turnaround time and fees and eliminated fees for residential photovoltaic systems. • May 2013 – amended Zoning Ordinance to allow greater opportunities for Meteorological Testing facilities and Small Wind Turbine Systems for on-site energy use in conjunction with residential, commercial, or agricultural land uses. • 2014 – County Planning & Development Services expanded its online permit system, particularly the permitting of residential roof-mounted solar photo voltaic. The expanded online services eliminate customer trips to PDS offices, while automation improvements enable faster

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		County review and processing. • 2015 – 8,047 residential roof-mounted solar photo voltaics were approved, a 59% increase over the number of permits approved in 2014. There has been a substantial increase in permits issued since adoption of the comprehensive update of the General Plan. This increase in permits issued is greatly attributable to the on-line permitting process established in 2013.
T-31	Similarly, Mitigation Measure CC-1.3 directs the County to "work with SANDAG to achieve regional goals in reducing GHG emissions associated with land use and transportation." *Id.* This measure is vague and unenforceable and fails to describe in any detail regarding specific changes to land use and transportation programs or performance criteria for the measure to ensure it will result in reduced emissions.	The County does not agree with the comment. The County and SANDAG must work cooperatively on the Regional Transportation Plan and associated Sustainable Communities Strategy that is updated every four years and was recently adopted in 2015. SANDAG and the County worked cooperatively in the drafting of the 2011 General Plan and worked with SANDAG during the development of the proposed Project and Project alternatives of the FCI Lands GPA. In tandem, the RTP and the General Plan work together to efficiently co-locate higher density land uses with the circulation and transportation options that are available to the residents and employees located in the unincorporated portions of the County.
T-32	A general plan's goals and policies are necessarily general and aspirational. The City may rely on such policies to mitigate environmental impacts under CEQA, however, only if they will be implemented through specific implementation programs that represent a firm, enforceable commitment to mitigate. *See Napa Citizens for Honest Gov't v. Napa County Bd. of Supervisors* (2001) 91 Cal. App. 4th 342, 358 (citing *Rio Vista Farm Bureau Center v. County of Solano* (1992) 5 Cal. App. 4th 351, 377). CEQA requires that mitigation measures actually be implemented—not merely adopted and then disregarded. *Anderson First Coalition v. City of Anderson* (2005) 130 Cal. App. 4th 1173, 1186-87 ; *Fed'n of Hillside & Canyon Ass'ns v. City of Los Angeles*(2000) 83 Cal. App. 4th 1252, 1261 .	The County disagrees with this comment. It is appropriate under CEQA both to rely on existing plan policies to reduce impacts, and to incorporate mitigation measures into a plan and thus ensure their enforcement. Public Resources Code 21081.6(b). The comment also misconstrues the legal authorities that are cited. Napa Citizens relates to later efforts to delete or change mitigation measures. The issue in Anderson First was the adequacy of fee-based mitigation, not plan policy mitigation. The issue in the Federation case was the agency's failure to incorporate mitigation measures into the general plan document in question, not that some further measures beyond plan incorporation are required. See also Response to Comment T-33.
T-33	Here, the RDSEIR's vague, unenforceable, and noncommittal policies and programs (and policies for which no implementation programs are identified) allow the County to decide to take no action and thus fail to mitigate impacts. As a result, the RDSEIR cannot ensure that the	The County does not agree that no implementation programs are identified. By reference, the FCI Lands GPA SEIR relies on the implementation programs identified in the GPU FEIR. Also, implementation programs are identified on pages 2.15-22 through 2.15-

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	policies relied on will in fact be implemented to mitigate the Project's impacts. Therefore they cannot serve as CEQA mitigation. *See Anderson First*, 130 Cal. App. 4th at 1186-87.	25 of the FCI Lands GPA Draft SEIR. In addition, page 2.15-21 of the Draft SEIR has been amended to include the applicable mitigation measures for each Policy identified as mitigation in Section 2.15. Consistent with Response to Comment T-28, the County agrees that General Plan Policies are not mitigation. They are General Plan polices considered as part of the baseline analysis of potential impacts from the FCI Lands GPA. Post-analysis, additional mitigation measures were considered for impacts related to Climate Change as well as all other resource areas. See Response to Comments T-13 through T-15.
T-34	A recirculated EIR must propose feasible, enforceable mitigation measures that quantify their effects on GHG emissions. Until the County does so, the EIR for this Project will be legally inadequate.	The County does not agree that the SEIR does not include feasible, enforceable mitigation or that the FCI Lands GPA SEIR is legally inadequate. See Response to Comments T-13 through T-15, T-28, and T-33.
T-35	Despite overwhelming authority to the contrary (*see* Exhibit A), the RDSEIR clings to its position that, upon the expiration of FCI, the land use designations reverted back to their pre-FCI designations. The "No Project" alternative, the RDSEIR concludes, would result in an onslaught of development and a slew of additional significant environmental impacts. RDSEIR at 4-4 and Table 4-4 at p. 4-97.	The County does not agree with the Comment. See Global Response 2 (GR-2).
T-36	The RDSEIR's analysis is not only legally incorrect—it is blatantly deceptive and designed to make the project and the EIR's alternatives look like compromise positions. They are not; the EIR must be revised to reflect the FCI condition, which is the true "No Project" alternative.	The County does not agree with the comment. Please see Global Response 2 (GR-2). The "FCI Condition" suggested by the comment is based on an initiative that no longer has legal force, as it has expired by its own terms. Consistent with the description of the expiration of the FCI in the Introduction of Chapter 1 of the Draft SEIR (page 1-1) and Project Scope (page 1-10) discussion of Chapter 1, the initiative adopting the FCI stated that it was to remain in effect until December 31, 2010. Upon expiration of the FCI, the former General Plan land use designations became effective once again. The FCI Lands GPA is a General Plan amendment to reclassify these lands to be consistent with goals, policies and guiding principles of the 2011 General Plan Update. Moreover, the initiative was reviewed in Chapter 4, Alternatives, of the Draft SEIR as a potential alternative, the FCI Density Alternative. It was rejected as infeasible; refer to Pages 4-7 through 4-13 for information pertaining to the rejection of the FCI Density Alternative due to its

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		infeasibility.
T-37	As explained in prior comment letters from CNFF to the County, there is nothing in the text of the FCI or the applicable statutes and case law that suggests that the land uses "reverted back" to pre-FCI designations on January 1, 2011. To the extent the County claims otherwise means it took a discretionary action to amend the General Plan without complying with CEQA. Therefore, the RDSEIR's alternatives analysis will remain legally inadequate until such time as the County prepares a revised EIR that properly describes and evaluates the No Project alternative as retaining FCI land use designations.	The County does not agree with the comment. Please refer to Response to Comment T-36. The County has not amended the current General Plan. The lands subject to the FCI reverted back to the previous land use designations found within the General Plan in effect at the time the FCI was enacted by voter initiative; the General Plan adopted by the County in 2011 does not apply to the FCI Lands. Notably, each operative provision of the FCI states that it is operative "through December 31, 2010" or that it "remains in effect through December 31, 2010." This differentiates the provisions of the FCI from more typical general plan amendments, which do not include an expiration or sunset date. The FCI Lands GPA is intended to reconcile the discrepancy in land use designations between the former General Plan and the current General Plan adopted by the County in 2011.
T-38	Finally, the County's theory that the pre-FCI land use designations will be reinstated after FCI's sunset undermines the long-term purpose of land use planning and sound planning principles. General plans do not terminate when they reach their scheduled horizon year. *See* Gov't Code § 65300 *et seq*. FCI's land use designations will simply continue until such time, if ever, that the County adopts new designations.	This comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. Nevertheless, the County has responded to this comment below and it will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. The County agrees that general plans do not terminate when they reach their scheduled horizon year and the County is not claiming that the General Plan, past or present, has expired. The County General plan adopted in 2011 replaced, or superseded the General Plan that was in effect until the 2011 General Plan was adopted; however, the 2011 General Plan did not establish land use designations for the FCI Lands. It is the County's position that the FCI has expired by its own terms. The FCI was not a General Plan; it was a voter initiative that amended the General Plan to establish land use designations on certain real properties subject to the initiative. Also, each provision of the FCI amending the General Plan states that it is operative "through December 31, 2010" or that it "remains in effect through December 31, 2010." This differentiates the provisions of the FCI from more typical general plan amendments, which do not include an expiration or sunset date.

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T-39	In sum, the RDSEIR's alternatives analysis is incomplete and misleading. When it is corrected, the County must recirculate the EIR so that the public can see and comment on the new analysis.	The County does not agree with this comment. Chapter 4 of the Draft SEIR presents analysis of a reasonable range of alternatives, consistent with CEQA Guideline 15126.6, including Project alternatives that were considered but rejected as infeasible.
T-40	As we previously submitted to the County, CNFF commissioned an infill study to determine whether the County's anticipated growth in the backcountry could be accommodated in the cities. *See* Exhibit C "An Alternative Development Scenario for San Diego County", CNFF, July 2010. The answer is a resounding yes. However, the County pays short-shrift to this alternative. The County did not dispute the Infill's Study conclusion but instead faults it for being out-of-scope since the County is re-designating only the FCI lands. RDSEIR at 4-16.	This comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. Nevertheless, the County has responded to this comment below and it will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. The County does not agree with the findings of the infill study commissioned by CNFF, that two-thirds of the growth planned for the unincorporated county could be accommodated in cities within San Diego County. Primarily, the County does not have the ability to direct growth to cities because it has no land use authority to do so. Current County land use plans have shifted future development from the unincorporated communities to incorporated cities. Below is an excerpt from San Diego Forward: The Regional Plan (SDF), Appendix J, Regional Growth Forecast (see page 4), which discusses how a smaller share of the region's growth is forecast to come from the unincorporated county than 1999 forecasts. "*In 1999, SANDAG projected 21 percent of future housing growth would occur in the unincorporated areas of the county under the local general plans at the time. Today, SANDAG expects 17 percent of growth to occur in the unincorporated areas; much of that is focused in existing villages such as Lakeside, Valley Center, Ramona, and Alpine*." SANDAG growth forecasts for the region are based on the land use plans of all the jurisdictions in the County. The capacity for growth in the region in other jurisdictions is already accounted for, as discussed below in another excerpt from SDF, Appendix J (page 3). *"SANDAG staff worked extensively with the region's 18 cities, the County of San Diego, and other agencies that manage land use (e.g., the Department of Defense, tribal governments) to understand local land use plans and policies, including general plans, community plans, or specific*

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		plans, as well as constraints to development. That detailed land use information is incorporated into the future development and redevelopment projections that comprise the Series 13 Regional Growth Forecast." Additionally, forecasted growth occurs first within the incorporated cities before the unincorporated County, according to the regional growth forecast modeling results. In all of the recent SANDAG forecasts, including the draft 2050 forecast, the forecasts already rely on the intensification of existing land uses, as discussed on page 4 of SDF, Appendix J: *"As a result of changing local plans, SANDAG forecasts a general intensification of existing land uses within urban communities and along key transportation corridors. For example, National City's general plan update results in opportunities for over 10,000 additional multifamily units near the Blue Line Trolley and planned trolley connecting San Ysidro and UTC via National City. San Marcos has drafted Specific Plans for the San Marcos Creek and University districts adding mixed use developments near Cal State-San Marcos and the SPRINTER Rail Corridor. This information was provided by these local jurisdictions to SANDAG in the land use inputs that reflect the jurisdictions' general plans. Finally, over half of the growth in new housing will occur in the city of San Diego. Downtown will continue to thrive over the next few decades and the growth will start to spill over into areas of Barrio Logan, Golden Hill, and Uptown communities. …"* Further, the County contends that the proposed Project land use plan follows basic objectives of the City-Centered alternative by substantially reducing growth in the backcountry. See also Response to Comment T-9, which shows that when the Alpine CPA is removed from consideration, there are only 245 potential additional lots available through subdivision in the remainder of the Project area (56,738 acres).
T-41	This conclusion is wrong. Under CEQA the County may not segment the Project in such a way as to render certain potentially feasible alternatives infeasible; such a result violates CEQA's rules against	The County does not agree with the comment that the Draft SEIR is segmenting the Project. The comment is not clear in explaining how the SEIR "segment(s) the Project…" in an effort to "avoid" feasible

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	piecemealing.	alternatives. CNFF has previously offered an alternative for consideration for the FCI Lands GPA, the City-Centered Alternative. This alternative was evaluated within Chapter 4, Alternatives of the Draft SEIR and was determined to be infeasible. Section 15126.6 of the CEQA Guidelines state: An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publically disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature and scope of the alternative to be discussed other than the rule of reason. The reasons for rejecting the City-Centered alternative are provided on pages 4-15 to 4-16 of the Draft SEIR. The reasons primarily center on the alternative not meeting most of the basic Project objectives and the inability to identify the lessening of impacts overall. While impacts may not be experienced in the unincorporated County under the City-Centered alternative, they would be equal or more severe in the incorporated cities wherein the County has no jurisdictional authority to address them. Additional reasons include: • Development beyond current planning documents within incorporated cities; • Lack of County jurisdiction to update incorporated city planning documents, or implement mitigation; • Additional development in low-lying coastal areas negatively impacted by climate change due to sea-level rise; and • The requirement for the County to meet its Regional Housing Needs Assessment allocation. Additional clarification has been added to the City-Centered Alternative analysis within in the Draft SEIR, Chapter 4. The additional clarification includes: Selected unincorporated communities that have infrastructure and services have been appropriately targeted for growth under the proposed Project. In addition, every effort has been made to reduce sprawl and haphazard development patterns, thereby reducing costs, energy consumption, and emissions and protecting farmland, open

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		space, habitat, and water quality and quantity. When compared to the existing General Plan, the proposed project substantially reduces sprawl and potential environmental impacts. (See also Response to Comments T-9 and T-40.
T-42	While the RDSEIR concedes that a City-Centered Alternative would reduce impacts on natural and agricultural resources, aesthetics, air quality, noise and traffic it prematurely dismisses that alternative without providing evidentiary support for its conclusion. RDSEIR at 4-15.	The County does not agree with the comment. Please refer to Response to Comment T-41. Consistent with CEQA Guideline 15126.6 (c) alternatives that fail to meet most of the basic project objectives, as has been determined by the County for the City Centered Alternative, may be among the reasons to eliminate the alternative from detailed consideration; evidentiary support for this determination is provided in the narrative description rejecting the alternative from detailed consideration.
T-43	Rather than conduct the analysis to determine the impacts resulting from this alternative, the RDSEIR dismisses further analysis of the City-Centered Alternative partially on the basis that such an alternative "would potentially result in greater impacts to air quality, traffic, and noise from increased construction and development in proximity to sensitive receptors…. " Id. This conclusion is not based on any analysis and is not supported by evidence.	The County does not agree with the comment. Please refer to Response to Comment T-41 and T-42. Consistent with CEQA Guideline 15126.6 (c) alternatives that fail to reduce impacts overall or lessen the severity of potential impacts, as has been determined by the County for the City-Centered Alternative, may be among the reasons to eliminate the alternative from detailed consideration. Evidentiary support for this determination is provided in the narrative description rejecting the alternative from detailed consideration.
T-44	Moreover, the County misunderstands our point. The Infill Study demonstrates that the City-Centered Alternative is feasible since it shows that growth can and should be accommodated in the cities, not in the Forest. Such an alternative would reduce impacts related to land use, provision of public utilities and services, transportation, climate change, loss of habitat and biodiversity, loss of agricultural lands, water supply and water quality. We reiterate the request set forth by CNFF and SOFAR that the revised environmental document should further develop an Infill Alternative that embraces a forward-looking plan for land uses on FCI lands, designed to protect the environment and maintain quality of life for those living and working in the County.	The County does not agree with the comment. Refer to Responses to Comments T-40 through T-43. Consistent with CEQA Guideline 15126.6 (c), the test for an alternative to be considered is not based on feasibility, but rather, the alternatives ability to meet most of the project's basic objectives and/or lessen the severity of one or more potential impacts.
T-45	CEQA requires agencies to analyze whether their projects will result in the wasteful or inefficient use of energy. Pub. Res. Code § 21100(b)(3); CEQA Guidelines, Appdx. F. "Under CEQA, an EIR is 'fatally defective'	See Global Response 6 (GR-6).

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	when it fails 'to include a detailed statement setting forth the mitigation measures proposed to reduce wasteful, inefficient, and unnecessary consumption of energy.'" *Cal. Clean Energy Committee v. City of Woodland* (2014) 225 Cal.App.4th 173, 209 (quoting *People v. County of Kern* (1976) 62 Cal.App.3d 761, 774).	
T-46	In order to demonstrate that a project will not result in the wasteful use of energy, agencies must show that the project has decreased per capita energy consumption, decreased reliance on fossil fuel use and increased reliance on renewable energy sources. *Id.* The RDSEIR fails entirely to include this analysis. A revised EIR must analyze the Project's impacts on use of energy and identify feasible measures to reduce energy usage.	See Global Response 6 (GR-6) The County does not agree with the comments paraphrasing of the required content of CEQA Guideline Appendix F. Moreover, because the FCI Lands GPA does not authorize the construction of projects, but rather, establishes land use designations for the FCI Lands consistent with the 2011 General Plan, the FCI Lands GPA approaches resource subjects with programmatic polices and mitigation measures to address potential impacts; project-specific mitigation cannot be developed without a specific project to evaluate. General Plan policies that facilitate the use of renewable energy sources are provided in the Draft SEIR (pages 2.14-27 to 2.14-28). Specific policies include: COS-14.7 Alternative Energy Sources for Development Projects, COS-15.1 Design and Construction of New Buildings and COS-15.3 Green Building Programs. These policies encourage alternative energy sources, energy efficiency, green building programs, and energy recovery for development. Adherence to these policies will deter the wasteful use of energy and lessen the dependency on fossil fuels. Mitigation measures to reduce energy consumption are provided in the Draft SEIR (page 2.14-28). Specific mitigation measures include: • USS-8.1 Implement, and revise as necessary, the County Green Building Program through incentives for development that is energy efficient and conserves resources. • USS-8.2 Revise Board Policy F-50 to strengthen the County's commitment and requirement to implement resource-efficient design and operations for County funded renovation and new building projects. Also revise Board Policy G-15 to require County facilities to comply with Leadership in Energy and Environmental Design (LEED) standards or other Green Building rating systems.

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T-47	Thank you for your consideration of these comments. We respectfully request that no further consideration be given to the Project as proposed until an EIR is prepared that fully complies with CEQA. The voters spoke loudly when they overwhelmingly approved FCI in 1991: The Cleveland National Forest is our County's legacy. We sincerely hope that you will hear the call to protect it.	This comment provides concluding remarks, a response is not required.

Responses to Comment Letter U
Pechanga Band of Luiseno Indians
February 29, 2016

	Comment	Response to Comment
U-1	This comment letter is written on behalf of the Pechanga Band of Luisefio Indians (hereinafter, "the Tribe"), a federally recognized Indian tribe and sovereign government. The Tribe formally requests, pursuant to Public Resources Code §21092.2, to continue to be notified and involved in the entire CEQA environmental review process for the duration of the above referenced project (the "Project"). Please also incorporate these comments into the record of approval for this Project.	This comment is an introduction to comments that follow. The Pechanga Band will be notified in the future pursuant to CEQA Guideline 15087 and PRC Section 21092.2. The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
U-2	The Tribe submits these comments concerning the Project's potential impacts to cultural resources in conjunction with the environmental review of the Project and to assist the County in developing appropriate avoidance and preservation standards for impacts to Cultural Resources. The Tribe has reviewed the Draft Supplemental Environmental Impact Report (DSEIR) and thanks the County of San Diego for including standard policies relating to the Resource Protection Ordinance (RPO) and cultural/historic resource protection mitigation measures.	The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
U-3	The Tribe met with the County for our SB18 government-to-government consultation on September 26, 2012 and submitted our DSEIR comments for this Project on March 18, 2013. The County did not conduct additional consultation with the Tribe until we received the second notice of availability for DSEIR. We understand from our initial meeting and our review of the DSEIR that overall, the proposed densities of the former-FCI lands will be reduced, which will result in reduced environmental impacts.	The comment identifies the government to government consultation held with the tribe and other consultations and does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the project.
U-4	The Tribe is primarily concerned about lands that are in the Pendelton / DeLuz CPA and the North Mountain Subregion areas and this time we are encouraged that the proposed development impacts to these areas will be reduced overall.	This comment identifies the commenter's primary area of interest as the Pendleton/DeLuz CPA and North Mountain Subregion. The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the project.

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U-5	The DSEIR states that there will be impacts to cultural resources should these lands be developed. Further, it states that direct, indirect and cumulative impacts to archaeological resources associated with the proposed Project would be reduced to below a level of significance with implementation of the 2011 General Plan policies and mitigation measures. The Tribe informs the County that unless cultural resources are entirely avoided and preserved, which is the preferred mitigation under CEQA, any impact is considered significant. Only preservation through avoidance can fully reduce any impacts to cultural resources to a less than significant level.	The County does not agree with this comment that resources must be entirely avoided and preserved to reduce impacts to a less than significant level. While avoidance of impacts is preferred by the CEQA Guidelines and the County of San Diego, reduction of the significance of impacts to a level of less than significant can be achieved by means other than avoidance, as has been determined within the Draft SEIR. Subsection 2.5.3.2 of the SEIR provides the guidelines for determining significance, in accordance with the CEQA Guidelines, which do not require that resources be entirely avoided and preserved. "Based on Appendix G of the CEQA Guidelines, the proposed Project would have a potentially significant impact if it would cause a substantial adverse change in the significance of an archaeological resource as defined by PRC Section 21083.2, State CEQA Guidelines Section 15064.5(a)……" Data recovery (excavation) is an allowable mitigation measure under CEQA. See PRC Section 21083.2(d); CEQA Guidelines § 15126.4(b)(3). The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
U-6	Additionally, the Tribe would like to emphasize that no project evaluation is complete without contacting and consulting with tribes early in the application/development process. Tribal knowledge is often more extensive than what can be identified in archaeological institutions and records. As such, consultation for projects in the identified areas of concern are essential to understanding the suite of impacts that may occur to cultural resources.	The County acknowledges this comment. As shown below, subsection 2.5.4.2 of the SEIR includes mitigation measures, in addition to the measures identified in this comment letter that require continued consultation with Native American tribes. Cul-2.1 Develop management and restoration plans for identified and acquired properties with cultural resources in coordination with the appropriate Native American tribe(s). Cul-2.4 Protect significant cultural resources through regional coordination and consultation with the NAHC and local tribal governments, including SB-18 review. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.

	Comment	Response to Comment
U-7	The Pechanga Tribe has a wealth of information that is not available through public information and our information provides a larger, fuller picture of the landscape and ties in the physical remains (archaeological sites) with named places, Traditional Cultural Properties (TCP's), tribal cultural resources (TCRs) and other cultural data. Tribes can also assist archaeologists with answering research questions and determining the significance of physical remains.	The County appreciates this information; however, the comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the project.
U-8	Based upon our concerns presented above, the Tribe suggests that the proposed mitigation measures be revised to include more tribal involvement and consultation requirements so that a broad analysis of cultural resources can be included for future implementing projects. **Cul-2.5** Protect undiscovered subsurface archaeological resources by requiring grading monitoring by a qualified archaeologist and a Native American monitor for ground disturbing activities in the vicinity of known archaeological resources, and also, ~~when feasible~~, during initial surveys.	The County does not agree with the requested change. There are not any ground disturbing activities included with this Project. County staff has found that, typically, it is feasible to have a Native American monitor present during initial surveys. This type of mitigation is outlined in the County's Guidelines for Determining Significance – Archaeological & Historic Resources. However, since this mitigation measure will require the presence of a monitor, it is essential that the feasibility of having a monitor present during initial surveys be taken into account. Further, this reflects the requirement that an EIR only describe feasible mitigation measures. (CEQA Guidelines § 15121(a).) The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
U-9	**Cul-2.6** Protect significant cultural resources by facilitating the identification and acquisition of important resources through regional coordination with agencies, and institutions, such as the SCIC and consultation with the NAHC and local tribal governments, including <u>AB 52 and</u> SB-18 review, while maintaining the confidentiality of sensitive cultural information.	The County agrees with this comment concerning the AB 52 review required by current legislation, which is not reflected in Mitigation Measure Cul-2.6 in subsection 2.5.4.2 of this SEIR. The NOP for this project was released in September 2012, prior to the July 2015 date when the requirement for AB-52 consultation was established. Although AB-52 does not apply to this project, the County elected to initiate an AB-52 consultation for this project and did so on January 8, 2016; however, the County did not receive a request for a consultation from the Pechanga Tribe. In addition, Section 1.6.1 of the Draft SEIR was amended to document the Assembly Bill (AB) 52 consultations conducted for this Project. Minor changes to General Plan documents that affect the entire unincorporated county are normally included in a biennial General Plan

	Comment	Response to Comment
		Clean-up General Plan Amendment. However, in addition to including the proposed change in the 2017 GP Clean-up GPA so that the proposed change can receive the appropriate level of public review, SEIR subsection 2.5.4.2 has also been revised to reflect the proposed change, as follows: Cul-2.6 Protect significant cultural resources by facilitating the identification and acquisition of important resources through regional coordination with agencies, and institutions, such as the SCIC and consultation with the NAHC and local tribal governments, including SB-18 and AB-52 review, while maintaining the confidentiality of sensitive cultural information.
U-10	**Cul-4.2** If human remains are encountered, California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the San Diego County Coroner has made the necessary findings as to origin. Further, pursuant to California Public Resources Code Section 5097.98(b) remains shall be left in place and free from disturbance until a final decision as to the treatment and disposition has been made. If the San Diego County Coroner determines the remains to be Native American, the Native American Heritage Commission must be contacted within 24 hours. The Native American Heritage Commission must then immediately identify the "most likely descendant(s)" of receiving notification of the discovery. The most likely descendant(s) shall then make recommendations within 48 hours, and engage in consultations concerning the treatment of the remains as provided in Public Resources Code 5097.98.	This comment proposes a new mitigation measure addressing what should occur when human remains are encountered; the County does not agree that the new mitigation measure is necessary. The County requires that all projects comply with Health and Safety Code Section 7050.5 and Public Resources Code 5097.98 should human remains be encountered. The specific steps outlined in the regulations cited above and CEQA Section 15064.5(e) must be followed. Therefore, the suggested language is not necessary to mitigate for human remains. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
U-11	The Tribe reserves the right to fully participate in the environmental review process, as well as to provide further comment on the Project's impacts to cultural resources and potential mitigation for such impacts.	The County appreciates this comment and will notify the Tribe when the FCI Lands GPA SEIR is scheduled for certification by the County Board of Supervisors. The Tribe as well as any member of the public will be able to provide testimony at that hearing; however, additional opportunities for public comment are not required by CEQA unless the SEIR is recirculated again for public review and comment, consistent with CEQA Guideline 15087.

	Comment	Response to Comment
U-12	The Pechanga Tribe looks forward to working together with the County of San Diego in protecting the invaluable cultural resources found within the County boundaries. Please contact me at 951-770-8113 or at eozdil@pechanga-nsn.gov if you have any comments or questions. Please also forward a copy of the final DSEIR to us for our review and files. Thank you.	This comment provides concluding remarks, a response is not required.

Responses to Comment Letter V
Lael Montegomery
February 28, 2016

	Comment	Response to Comment
V-1	This General Plan Amendment is one of many being proposed that expand the Village land use designations outside the boundaries for the Village areas in the County's relatively new General Plan. The Cleveland National Forest Foundation has written repeatedly, and I agree with their view, that approval will allow development to further encroach into stressed, fragile ecosystems within the Cleveland National Forest.	The County acknowledges that, as shown on Draft SEIR Figure 1-2B, land uses are proposed to expand the village of Alpine eastward along Interstate 8 (see also Response to Comment V-5). The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine the final land use designations for the Project.
V-2	This encroachment is not justified. The RDSEIR identifies the Modified FCI Condition alternative as reducing encroachment into forest areas and as environmentally superior. See RDSEIR at S-7 and 4-2. The County should NOT be considering the proposed Project when there is clearly an environmentally superior option. New development can and should be accommodated inside the Village designated areas so that agriculture, open space and forest land values can be preserved.	The County agrees that the Modified FCI Condition alternative reduces potential impacts when compared to the Draft SEIR proposed Project. This comment references Draft SEIR pages S-7 and 4-2, which provide a description of the Modified FCI Condition alternative. This alternative is a result of the public outreach process for this Project and was developed for analysis as the environmentally superior alternative. However, the County does not agree that the proposed Project should not be considered because there is an environmentally superior option. The comment does not explain how the Modified FCI alternative fully meets all Project objectives better than the proposed Project. The Draft SEIR proposed Project more closely reflects the October-November 2013 recommendations of the Planning Commission and the June 2014 land use map endorsements of the Board of Supervisors, which provide the intent of the Project objectives outlined in the Draft SEIR Section 1.3. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine whether to approve the proposed Project or an alternative to the Project.
V-3	The County should NOT be considering any amendments that add thousands of houses in rural areas to the 2011 County General Plan which already accommodates some 70,000 new units – and in areas where infrastructure, transit, jobs, shopping, civic facilities and other	The comment asserts that the County should not be considering an amendment that adds thousands of homes to rural areas. As explained in SEIR Section 4.5.1, the proposed Project is assigning land use designations that will decrease densities overall when compared to the

	Comment	Response to Comment
	urban amenities are planned, or already exist.	existing land use designations, i.e. the No Project alternative. As described in SEIR Chapter 4 Section 4.1, the No Project alternative represents the pre-FCI General Plan land use densities which currently apply to the former FCI lands (Project areas). Therefore, current land use designations provide for densities on these lands, which are generally higher than densities of the proposed Project and higher than the densities in effect during the life of the FCI (1993-2010). The analysis in the Draft SEIR did not use either the current densities or the densities of the FCI as a baseline. Rather, the SEIR analyzed the impacts of the proposed Project in comparison to existing physical conditions (i.e., what is on the ground today). See also Global Response 2 (GR-2). The County does not agree that the proposed Project would add "thousands of homes in rural areas". Table 1-1C has been added to subsection 1.2.1 of the SEIR to show the subdivision potential of the proposed Project as it compares with the subdivision potential of the existing land use designations (No Project alternative). As shown in this table, buildout of the proposed Project would potentially add 2,395 additional residential lots beyond the 3,850 existing parcels. This is 8,917 fewer lots than would be allowed by the existing land use designations. Table 1-1C shows that 2,224 of the 2,395 additional lots that could result from buildout of the proposed Project are in the community of Alpine, most of which are planned as an extension to the existing Alpine Village along the Interstate 8 corridor. In addition, much of this new development potential would be located in the vicinity of the Viejas Reservation, characterized by urban development patterns consisting of two five-story hotel towers and a casino and retail mall complex. Therefore, buildout of the proposed Project would result in a potential of only 171 additional lots throughout the remainder of the Project area, rather than the thousands of homes claimed by the comment to be allowed under the proposed Project. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
V-4	I support CNFF's recommendation to create a "forest" designator to overlay all lands regardless of parcel size within the FCI planning area. CNFF supports minimum parcel sizes of at least 40 (or 80) acres	The County is unclear as to the benefit of the proposed "forest" designator, other than add an unnecessary administrative burden to the County. Refer also to Response to Comment T-6.

	Comment	Response to Comment
	outside country towns (villages) to protect forest values. As CNFF has written, again repeatedly and I think wisely, the "forest" designator would serve as a "red flag" for landowners that seek to develop or subdivide properties in excess of the adopted FCI Amendment land use designations. The "forest" designator is fully consistent with the San Diego County Guiding Principles and would specifically reinforce Guiding Principles 2 (compact development within Village boundaries), 3 (vitalize existing communities), 4 (habitat protection), 5 (wildfire risk), 6 (promote public transportation), 7 (reduce greenhouse gas emissions), 8 (preserve agriculture), and 9 (reduce infrastructure costs).	The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
V-5	What is the point of planning if the plans are ignored? As it is, San Diego County's flaccid enforcement of its own General Plan encourages windfall speculation in wild lands we MUST protect while it discourages responsible investment in city-building.	The County does not agree with this comment, which asserts that the proposed Project is ignoring the General Plan. FCI lands were not included (provided land use designations) in the 2011 General Plan Update, although densities associated with the FCI lands were assumed (generally at 1:40 or 1:80) for overall General Plan implementation impact determination. The primary purpose of this Project (FCI Lands GPA) is to assign land use designations to the FCI lands that were not included in the General Plan Update, consistent with the Project objectives and General Plan Guiding Principles. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.

Responses to Comment Letter W
Sweetwater Authority
February 29, 2016

	Comment	Response to Comment
W-1	Thank you for providing notification to Sweetwater Authority (Authority) on the Draft Revised Supplemental Environmental Impact Report (SEIR) for the Forest Conservation Initiative (FCI) Lands General Plan Amendment, GPA 12-004. Sweetwater Authority is a public water agency in the South Bay area of San Diego County serving approximately 191,500 people residing in National City, the western and central portions of Chula Vista, and Bonita. The Authority operates Sweetwater Reservoir in Spring Valley and Loveland Reservoir in Alpine to store local and imported water for its customers and utilizes the Sweetwater River to transfer water from Loveland Reservoir to Sweetwater Reservoir. The proposed project would potentially affect the former FCI lands and adjacent private lands in San Diego County, including areas within the 230-square-mile Sweetwater River watershed.	This comment is an introduction to comments that follow. No further response is required.
W-2	2.7.4.1. Water Quality Standards and Requirements The Authority recommends updating Mitigation Measure Hyd-1.10 (p. 2.7-18). This Mitigation Measure requires coordination with the State Water Resources Control Board to develop statewide performance and design standards for conventional and alternative Onsite Wastewater Treatment Systems (OWTS). The document states that when alternative OWTS are permitted, implementation of this Mitigation Measure will help prevent potential conflicts with applicable standards and regulations. However, it is our understanding that the County Code was amended in 2015 to include supplemental treatment systems, and this amendment was completed through a Local Agency Management Program (LAMP) for OWTS approved by both the Regional Water Quality Control Board and the County Board of Supervisors. A copy of the document is enclosed. The LAMP is designed to protect surface water bodies and groundwater sources from contamination through the proper design, placement, installation, maintenance, and assessment of individual OWTS and	The County agrees that the Local Agency Management Program (LAMP) for Onsite Wastewater Treatment Systems, which contains design/performance standards for alternative onsite wastewater treatment systems, was approved by the Regional Water Quality Control Board on April 29, 2015 and adoption and ordinance changes were approved by the County Board of Supervisors on June 24, 2015. Mitigation measure Hyd-1.10 applies to all lands in the unincorporated county. The County does not agree that Hyd-1.10 needs to be updated because the County and Regional Water Board have coordinated, developed and adopted "performance and design standards for conventional and alternative on-site wastewater treatment systems." Potential impacts to water quality derived from conventional and alternative on-site wastewater treatment systems are addressed on a project by project basis and would be addressed directly by Mitigation Measures Hyd-1.1 through Hyd-1.10 and General Plan Policies LU-6.5, LU-6.9, LU-14.1 through LU-14.4, COS-4.2 through COS-4.4, COS-5.2, COS-5.3, COS-5.5; and indirectly addressed by Mitigation Measures

	Comment	Response to Comment
	should be incorporated in Mitigation Measures for GPA 12-004. Because the Authority derives up to 70 percent of its potable water from local sources, including groundwater and surface water runoff to the Sweetwater River, water quality impacts could potentially carry significant ramifications for the Authority's water supply and customers.	Hyd-1.1 through Hyd-1.5, Hyd-2.1 through Hyd-2.5 and General Plan Policies LU-8.1, LU-8.2, LU-13.1, LU-13.2, COS-4.1 through COS-4.4 and COS-5.2.
W-3	**Alpine Land Use Map** The Alpine Land Use map (AL-PropProj) includes an incorrect land use designation for Assessor's Parcel Number 520-100-12-00. This parcel, shown on enclosed Figure 1-2A, has been under the Authority's ownership since 2013 and should be designated as Public Agency Lands instead of the proposed Rural Lands (RL-40) designation shown on the map.	The commenter requests that the County change the land use designation for assessor parcel number 520-100-12-00 from Rural Lands 40 to Public Agency Lands due to a change in ownership. This change will reduce the potential buildout in Alpine by one dwelling unit and would not have a measurable change to the impact analysis in the SEIR. These types of changes are normally included in a biennial General Plan Clean-up General Plan Amendment; therefore, this land use designation change will be included in the 2017 GP Clean-up so that the proposed change can receive the appropriate level of public review.
W-4	We appreciate the opportunity to comment on the Draft Revised SEIR for the FCI Lands General Plan Amendment. Please continue to include the Authority on the County's distribution list for GPA 12-004. If you have any questions, please contact Jane Davies at jdavies@sweetwater.org or (619) 409-6816.	This comment provides concluding remarks, a response is not required.

Responses to Comment Letter X
Gerald Fisher
February 26, 2016

	Comment	Response to Comment
X-1	The timing, coincidentally, seems excellent to deal with another EIR-type event-the imposing Northern Route of the SDG&E Sunrise Powerlink line TL682. As you know, the increased easement size to accommodate the 500KW lines, supported by CPUC Rule 95, Sec. 35, allows SDG&E to cut to bare earth everything, to the last blade of grass, a swath twice as wide as the distance between poles - 800-1000 feet+!	The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative that will be considered by the decision makers. This letter references two parcels (APNs 135-320-02-00 and 136-210-01-00) which are discussed in SEIR Section 4.1.1, Fisher Property Exemption. As discussed in this section of the SEIR, this property totals approximately 87.5 acres and spans both the Pala-Pauma and North Mountain Subregions. However, only 13.5 acres of APN 136-210-01-00, which is located in the North Mountain Subregion were subject to the FCI and are within the Project area. This comment is discussing a different project than this FCI Lands GPA, which is the construction of San Diego Gas and Electric (SDG&E) powerlines. There is no known relationship between the two projects. Therefore, a response is not required.
X-2	Due to the uniqueness, layout, and location of our property, with this probability, it could completely destroy an entire oak grove and the habitats of hundreds of animals - it would be a "taking" far in excess of the "down-zoning" being proposed.	The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative that will be considered by the decision makers. The FCI Lands GPA proposed Project and alternatives would not affect the alignment of the powerlines being addressed by the comment. The FCI Lands GPA is not a “down-zoning” proposal; the FCI Lands GPA does not propose nor require the County to “take” any private property to implement the Project. See Response to Comment X-1.
X-3	Could I please request a "helpful discretionary hat" be put on? I believe the following will be beneficial to all parties, without taking from another, and still stay within everyone's guidelines, such as your CDM.	This comment is an introduction to comments that follow. No further response is required.

	Comment	Response to Comment
X-4	First, please review maps A & B. Keeping with the "Big Picture" from say 20,000 ft., our property has some aspects that are unusual: (a) though relatively small, it has 9 conflicting interests - state, federal, BLM, two planning groups, Tree of the U.S., MSCP, owner, fauna; (b) elevation/terrain (2500±MSL vs. 6500±MSL); water availability; (c) major east/west highway.	The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative that will be considered by the decision makers. This comment refers to two maps included with this comment: (A) Point Precipitation Frequency and (B) a topographical map showing the subject property. The County concurs with the comment that the area in the vicinity of the subject property has multiple landowners, a significant elevational range, highway access within the vicinity and a potential potable water supply.
X-5	Second, Highway 76, as a designated "Scenic Highway", the legislation clearly supports/mandates the undergrounding of utilities. The County, as a fellow landowner (school to the east), together with CNF (really not needed), Rey River Ranch, La Jolla Indian Reservation, all supporting at no cost, can enjoy this benefit.	The General Plan, Conservation & Open Space Element Table COS-1 designates State Route (SR) 76 in the vicinity of the subject property as a County Scenic Highway. However, SR 76 is not a designated state scenic highway which the state legislation would apply to. Scenic Highway Guidelines, prepared by the California Department of Transportation (Caltrans), identifies the process for nominating, then designating a state highway as scenic. The designation portion of this process requires State legislative actions. Therefore, the legislation that applies to undergrounding powerlines adjacent to state highways would not apply to SR 76. In addition, the County does not agree that legislation mandates undergrounding of utilities for designated Scenic Highways because the language of the Code states to achieve undergrounding whenever feasible. The applicable text from Public Utilities Code, Division 1, Part 1, Chapter 2, Section 320 is provided below. "…The Legislature hereby declares that it is the policy of the State to achieve, *whenever feasible*, and not inconsistent with sound environmental planning, the undergrounding of all future electric and communication distribution facilities which are proposed to be erected in proximity to any highway designated a state scenic highway…"
X-6	[Note]: AT&T has already set a precedent by burying their lines in the highway. SDG&E has agreed to underground this new line on the contiguous La Jolla Reservation (gas station, store, campground, motocross), also setting a precedent. The elevation all along the road	See Response to Comment X-1. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative that will be considered by the decision makers.

	Comment	Response to Comment
	raises our property, like a shelf, which puts it at risk for SDG&E to do the Rule 95 game.	
X-7	Third, a creek runs near a pole. The biological/environmental damage due to the anchors needed for the poles would expand SDG&E damage all along its easement in this canyon area of the San Luis Rey River.	See Response to Comment X-1. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative that will be considered by the decision makers. This comment raises an issue that a creek near an SDG&E pole would cause the need for anchors that could result in biological/environmental damage. This SDG&E project, which is separate from the FCI Lands GPA, is required to prepare a separate environmental analysis that is not included with this Project. Any environmental impacts would be identified by the analysis prepared for the SDG&E project.
X-8	[Summary]: By returning our property to the 1 DU/BAC and recognizing the 2 MU P's, SDG&E will be further encouraged to move into the highway to place their lines, vs. condemnation.	The commenter has not provided any evidence to show how the General Plan land use designation would relate to where SDG&E locates their powerlines. See Response to Comment X-1. Without this direct evidence, the County does not concur that the designation of the subject property (either one dwelling unit per eight or 40 acres) would have any effect on where SDG&E locates their powerlines. This comment does not raise an issue related to an environmental issue for the FCI Lands GPA pursuant to CEQA.
X-9	The benefit to SOG&E is there is no restriction on size of line. Current EIR is still in question. No maintenance cost for easement. SDG&E can take credit for "beautifying the landscape". SDG&E can take credit for the "ultimate fire protection" they will be providing.	The benefits identified in this comment for undergrounding powerlines; such as beautification, less maintenance cost and better fire protection, are not related to the FCI Lands GPA. Therefore, this comment does not raise an issue related to an environmental issue related to this Project. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine the final land use designations for the Project.
X-10	San Diego County will enjoy the elimination of concerns over electromagnetic fields from 500KW± lines harming their children. San Diego County can enjoy, with no subsidy, 50-80± Affordable Housing homes that could be built by any owner of our property without being first transferred to Indian exemption. Note: We would accept the original 1 DU/SAC, with a condition that homes	The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative that will be considered by the decision makers. This comment discusses additional benefits of undergrounding SDG&E powerlines. Refer to Response to Comment X-9, which explains why this is not related to the FCI Lands GPA.

	Comment	Response to Comment
	be "green", the value be "affordable", water be, as it has been and is now, from the mountain, any oak tree disturbed be mitigated by 2 to 1 on westerly portion where dozer work during the '07 fires wiped out many oaks.	The comment further implies that 50 to 80 homes could be built if the subject property were designated at a density of one dwelling unit per eight acres. Please refer to Response to Comment X-1, which explains that only 13.5 acres of the total 87.5 acres of the subject property are within the FCI Lands GPA Project area. Therefore, even if this portion of the parcel were designated at a density of one dwelling unit per eight acres, only one additional dwelling unit would be allowed at buildout. In addition, as explained in SEIR Section 4.1.1, Fisher Property Exemption, the semi-rural density of one dwelling per eight acres proposed by this comment would not be consistent with the General Plan Guiding Principles (refer to the General Plan Consistency Determination provided in this section).
X-11	Mr. Citrano, the COM process appears to try to be fair to the people. Our property, to many, would seem to be like some in the Middle East, with warfare and conflict coming at it from all sides. Some solutions would be the equivalent of taking off a complete hand in place of a "fingernail trim".	The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative that will be considered by the decision makers. Refer to Responses to Comments X-1 and X-10.
X-12	I pray "County Discretionary Power'' will be like the good Lord parting the Red Sea for His people.	This comment provides concluding remarks, a response is not required.

Responses to Comment Letter Y
Becky Davis (Dorthiea Hinkle)
January 19, 2016

	Comment	Response to Comment
Y-1	My mother is Dorthiea Hinkle, owner of the afore-mentioned properties. At her age, she is unable to manage and care for the property that has been in our family for over 20 years. She has attempted to sell it as a ranch with, really, little or no development potential, and there is no market for that. There is also no market, from what I can tell, for 40 acre "ranch-ettes."	The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
Y-2	Even if one had the money to subdivide, the infrastructure needed to reach the individual properties would leave nothing in the deal for the land owner.	The comment expresses concern over the costs of providing necessary infrastructure to the property. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
Y-3	I encourage my mother to support the plan shown in Figure 4-3A which was adopted by the San Diego County Planning Commission. It would allow her more lots and the ability to cluster them all on her relatively flat front 60 acres. This is in keeping with the neighborhood south of Japatul Spur, much of which had subdivided to this density before the FCI was initiated.	This comment expresses support for the Alpine Alternative Land Use Map alternative shown on Draft SEIR Figure 4-3A, which was the alternative recommended, not adopted as the comment infers, by the County Planning Commission in November 2013. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine whether to approve the proposed Project or an alternative to the Project.
Y-4	I therefore support the "Alpine Land use Alternative Map Figure 4.3 A", and do NOT support the "Mid Density Plan" that calls for 40 acre minimum over the entire property.	The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR, but concerns the commenter's preference for the Alpine Alternative Land Use Map alternative over the Mid-density alternative. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine whether to approve the proposed Project or an alternative to the Project.

Responses to Comment Letter Z
Dorthiea Hinkle
January 19, 2016

	Comment	Response to Comment
Z-1	My name is Dorthiea Hinkle. I am over 90 years of age, and have lived on this property (until recently) for over 20 years. My husband, Al Hinkle, owned this land when I married him in 1993.	The comment provides introductory remarks and does not raise an issue related to an environmental issue pursuant to CEQA. No response is required.
Z-2	It is not easy to manage and maintain properties of this size. They are too small to ranch efficiently, and too large for a home. Forty acre minimum, with the cost to run roads and water, would leave you nothing for value in the land.	The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
Z-3	I feel like that I know every nook and cranny of that land. I have explored the gold mine which was a delight for the children and their friends; and I have found beauty in the wilder, more secluded parts of the property.	The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
Z-4	But, people do not seem to want to hold or care for large pieces of property anymore. When Al acquired it, he believed in its future development opportunities. County regulations have severely limited that potential. I see my neighbors confronted with the same quandary.	The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine whether to approve the proposed Project or an alternative to the Project.
Z-5	That is why I have decided that I can accept the compromise offered by the Planning Commission that, I am told, provides 20 acre minimum over about 60 of my front acres, and would leave the balance of the land untouched. That is reflected, I believe, in Figure 4-3A of the "Alpine Land Use Alternative Map".	The comment is correct that the Alpine Alternative Land Use Map Alternative reflects the designations recommended by the Planning Commission in November 2013. However, the County does not agree that this alternative would assign a 20-acre minimum lot size. The 2011 General Plan Update, which bifurcated lot size and density, assigned a density of one dwelling unit per 20 acres. However, minimum lot size is addressed in zoning. The Project proposes to change the zoning to an 8-acre minimum lot size for these parcels. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine whether to approve the proposed Project or an alternative to the Project.

	Comment	Response to Comment
Z-6	I have been told that "clustering" lots on the front 60 acres will be allowed, and this would enable me to have seven viable lots of an 8-acre size.	The County Conservation Subdivision Program *requires* clustering at densities of one dwelling unit per ten acres or lower. More details on the Conservation Subdivision Program are available at: http://www.sandiegocounty.gov/content/sdc/pds/advance/conservationsubdivision.html The densities assigned by the Alpine Alternative Land Use Map alternative would allow the 237-acre property to be subdivided into seven lots; however, other factors will also need to be considered when determining how many lots would result from subdivision of the subject property, such as meeting infrastructure and access requirements. The County agrees with the statements in this comment, which are consistent with the analysis in the Draft SEIR. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine whether to approve the proposed Project or an alternative to the Project.
Z-7	I may never develop this property, but it is what I hope to leave to my children. And, as I feel I have been a good steward of the land up until now, I would like to be assured that the greatest potential of the land is achieved, while maintaining its' wild beauty in other areas.	This comment provides concluding remarks, a response is not required.

Responses to Comment Letter AA
Janice & Collin Campbell (Augustyne-Kaderbek)
January 27, 2016

	Comment	Response to Comment
AA-1	Our property located at 3535 Alpine Boulevard is surrounded on 3 sides by the Augustyne-Kaderabek holding. Because we have a similar expectation for the future development of our area, we hope to work in a compatible manner with our neighbor and the county to realize a sensible plan.	This comment letter addresses the same property referenced in Comment Letter H (APNs 404-231-03 and 404-240-18). As with Comment H-1, this comment provides the context for the property and the property owners' intent to prepare a development plan acceptable to the County and adjacent property owners. The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
AA-2	Consequently, we approve the reclassification shown on all pertinent maps for a designation of VR-2 and Rural Commercial on the Augustyne-Kaderabek properties.	This comment provides support for the land use designation assigned to a neighboring property by the Draft SEIR proposed Project and also by the Alpine Alternative Land Use Map, Mid-density and Modified FCI Condition alternatives. The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
AA-3	We believe we are the only residential neighbor to the proposed Rural Commercial, and we see it as a benefit; given its proximity to the West Willows off ramp.	The commenter expresses support for the Rural Commercial designation within the proposed Project designations that are proposed for the neighboring property and does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
AA-4	We are glad to see the SEIR finally going forward, and we look forward to its final resolution before the San Diego County Board of Supervisors in 2016.	This comment reiterates the support for the Draft SEIR proposed Project. The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.

Responses to Comment Letter AB
Kaderbek-Augustyne
January 21, 2016

	Comment	Response to Comment
AB-1	As the owner of these parcels totaling 78.42 acres, we have been working for several years toward achieving the classifications illustrated in the SEIR on both the Mid-density map and the Alpine Land Use Alternative Map.	This comment provides that the commenter is the owner of two parcels in Alpine within the Project area (APNs 404-231-03-00 and 404-240-18-00) and that the commenter has been working toward achieving the designations assigned by the Mid-density and Alpine Alternative Land Use Map alternatives. To clarify, the proposed Project and Modified FCI Condition alternative assign the same designations, which are Village Residential 2 (VR-2) and Rural Commercial. The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
AB-2	Our property was recommended for the classifications of VR-2 with a small area set aside for Rural Commercial in the Alpine Community Planning Group Plan, the Staff recommended plan, and the San Diego County Planning Commission Plan.	The comment correctly states that both the Alpine Community Planning Group and County Planning Commission recommended a VR-2 land use designation for the subject property. The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
AB-3	Our inclusion within the village of Alpine, our immediate proximity to the site of the future Alpine High School, as well as being inside the current Water Service Area makes this property very appropriate for higher density development.	The subject property is not within the Alpine Village; however, the subject property is within the County Water Authority boundary. The County agrees that a primary objective of the General Plan Update was to focus growth inside the CWA boundary. The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
AB-4	We look forward to a hearing in the near future that will bring this matter to a pleasant conclusion. It has been a long four and a half years.	This comment, which encourages a hearing in the near future, does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
AB-5	We support the classification of VR-2 over our residential land and Rural Commercial on 2.4 acres.	The County acknowledges the commenter's support for a VR-2 and Rural Commercial designation for the subject property. The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.

Responses to Comment Letter AC
Kaderbek-Augustyne (Campbell Creek Ranch)
Undated

	Comment	Response to Comment
AC-1	Our property is an immediate neighbor to the property located at 3535 Alpine Blvd. and known as the Campbell Creek Ranch; in fact, we surround it on (3) sides.	This comment, which identifies the location of a specific property located at 3535 Alpine Boulevard within the Project area, does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
AC-2	We recognize that like our own property, the Campbell Ranch is within the Village Core, and must be expected to take its' share of the growth of our community.	The subject property is not within the Alpine Village; however, the subject property is within the County Water Authority boundary. The County agrees that a primary objective of the General Plan Update was to focus growth inside the CWA boundary. This comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
AC-3	Much like our own property, Campbell's holding is within the water service area and can, at some point, be expected to have sewer available.	The commenter is correct that the property is within the service area for the Padre Dam Municipal Water District. This comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
AC-4	Therefore, we support the recommended designation of VR-2 as described in both the Alpine Mid Density Map and the Alpine Land Use Alternative map. This property, like our own, received the full support of the Alpine Planning Group and the SD County Planning Commission.	The commenter supports a Village Residential 2 (VR-2) designation for the subject property. The County acknowledges that the Draft SEIR proposed Project; the Alpine Alternative Land Use Map, Mid-density and Modified FCI Condition alternatives assign a VR-2 designation to the subject property. The County confirms both the Alpine Community Planning Group and County Planning Commission recommended VR-2 for the subject property. This comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
AC-5	We look forward to the final resolution of this matter in the near future.	This comment provides concluding remarks and does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.

Attachment C-3
Volume III
Description of the Recommended Project

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PURPOSE OF AMENDMENT 1

RECOMMENDED PROJECT 1

1) Japatul Valley 3
2) Eastern Alpine 4
3) End of Via Dieguenos 5

TABLE

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2) Central Mountain 8
3) Cuyamaca 9
4) Descanso 10
5) Desert 11
6) Jamul/Dulzura 12
7) Julian 13
8) Lake Morena / Campo 14
9) Mountain Empire 15
10) North Mountain 16
11) Pendleton-DeLuz 17
12) Pine Valley 18
13) Ramona 19

PURPOSE OF AMENDMENT-RECOMMENDED PROJECT

The project that will be presented to the Board of Supervisors for approval (Recommended Project) is the Alpine Alternative Land Use Map alternative evaluated in the Draft Supplemental Environmental Impact Report (SEIR). The draft SEIR proposed Project and Project alternatives are presented in Volume I of this Draft Final SEIR. Volume II consists of the Summary of Changes to the Draft SEIR, public comment letters and the County's response to public comments. Volume III, Amendment to the SEIR, describes the differences between the proposed Project and the Recommended Project.

The analysis that follows demonstrates that the Recommended Project will satisfy CEQA's requirement to analyze Project alternatives that will mitigate impacts and achieve the Project objectives. The Recommended Project does not include significant new information from that which was presented in the Draft SEIR circulated for public review, nor are there significant new impacts from the Recommended Project. Therefore, the Recommended Project's inclusion in the Final SEIR does not deprive the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the Project or a feasible way to mitigate or avoid such an effect.

In preparing and formulating the Recommended Project, the Board of Supervisors considered the SEIR for the Project, which consisted of the Draft SEIR proposed Project and several Project alternatives, public testimony on the Project, staff responses to public and Board inquiries, and developed the Recommended Project described herein.

RECOMMENDED PROJECT

The Recommended Project, shown as Figures 1 through 13, represents the result of a deliberative public process to formulate a project that meets the Project objectives while minimizing impacts. The Recommended Project land use map is the same as the proposed Project land use map in all communities within the Project area, with the exception of the Alpine Community Planning Area (CPA). The Recommended Project for the Alpine CPA is the same as the Alpine Alternative Land Use Map alternative and differs from the draft SEIR proposed Project in three areas. Since Alpine Alternative Land Use Map alternative is less intense than the draft SEIR proposed Project, the Recommended Project will have less environmental impacts than the draft SEIR proposed Project.

Table 1 shows the distribution of land uses by CPA and sub-region for the Recommended Project and is the same as the draft SEIR proposed Project in all CPA's and sub-regions, with the exception of the Alpine CPA. The Rural Lands Regional Category designations represent the greatest portion of the Project area (85%) with 60,750 of the total 71,715 acres.

TABLE 1. RECOMMENDED PROJECT LAND USE PROJECT AREAS (IN ACRES)

CPA or Sub-region	Village Residential	Semi-rural Residential	Rural Lands	Specific Planning Area	Rural Commercial	Village Core Mixed Use	Public/ Semi-Public Facilities[4]	Public Agency Lands[1]	Tribal Lands	Open Space	Total[2]
Alpine CPA	232.8	4,030.7	9,102.9		139.1	152.2			90.0		**13,748**
Central Mountain Sub-region											**26,970**
Cuyamaca		11.8	2,953.4								2,965
Descanso	7.1	1,899.7	3,674.0		4.6			159.1			5,744
Pine Valley			12,382.4		4.4			527.3			12,914
Unrepresented			4,921.5					163.2		262.0	5,347
Desert Sub-region			166.3					3.7			**170**
Jamul/Dulzura Sub-region		241.7	1,004.0								**1,246**
Julian CPA		952.6	7,425.2				48.5			40.4	**8,467**
Mountain Empire Sub-region											**2,052**
Campo/Lake Morena		58.1	1,232.3				0.1	271.3			1,562
Unrepresented			129.7					360.0			490
North Mountain Sub-region											**17,221**
Palomar Mountain		301.8	11,741.1		32.0		6.4	4.0	8.0		12,093
Unrepresented			5,005.8	21.7			82.4			18.3	5,128
Pendleton/De Luz CPA			1,010.9								**1,011**
Ramona CPA	43.6	681.7					89.1			16.1	**830**
Unincorporated County Total[3]	**283.5**	**8,178.0**	**60,749.7**	**21.7**	**180.1**	**152.2**	**144.1**	**1,571.0**	**98.0**	**336.8**	**71,715**

Source: County of San Diego, Planning & Development Services, 2016.

1 Includes federal and State lands.

2 Total acreage rounded to the nearest whole number. Differences in total are attributed to rounding

3 Includes 381.8 acres of Non-FCI lands.

4 Includes Open Space (Recreation).

As described below, the Recommended Project Land Use Map differs from the proposed Project in three areas of the Alpine CPA: (1) Japatul Valley, (2) eastern Alpine, south of Interstate 8 and (3) end of Via Dieguenos Road.

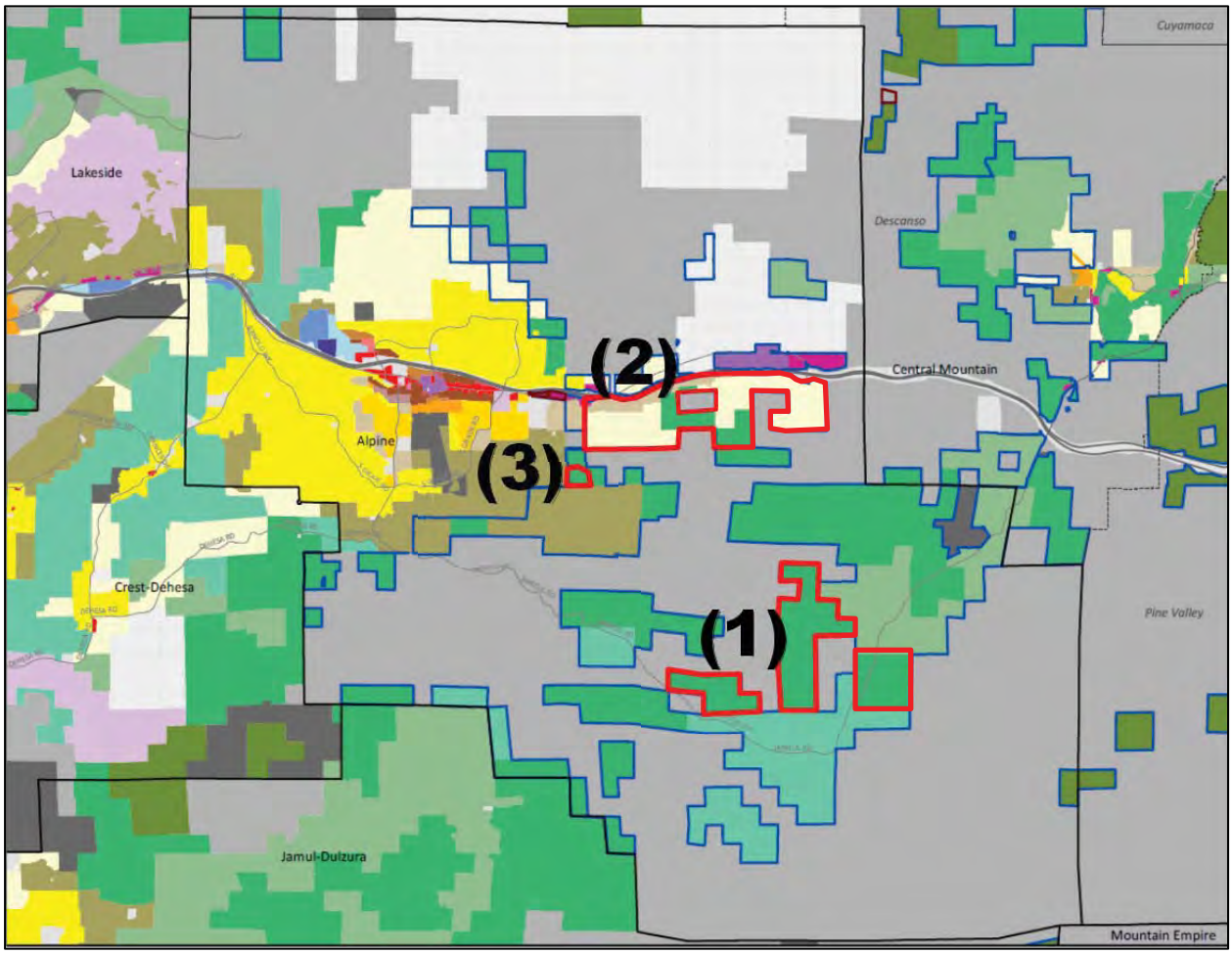


Figure A. Recommended Project Areas of Difference to the Proposed Project

1) Japatul Valley

The Recommended Project reduces the density in three areas of Japatul Valley totaling 1,362 acres and shown as Area (1) on Figure A. This density, which was analyzed under the Alpine Alternative Land Use Map, Mid-density and Modified FCI Condition alternatives of the draft SEIR, responds to concerns raised in public testimony over the high fire threat in the area, overall large parcel sizes, dead-end road concerns and distance away from the Alpine Village.

- *Land Use Designation* - The Recommended Project assigns a Rural Lands 40 (RL-40) land use designation to 16 parcels, rather than the Rural Lands 20 (RL-20) designation assigned by the draft SEIR proposed Project.
- *Potential Buildout* – The Recommended Project would reduce the potential buildout by 32 dwelling units, from 64 allowed by the proposed Project to 32 units.

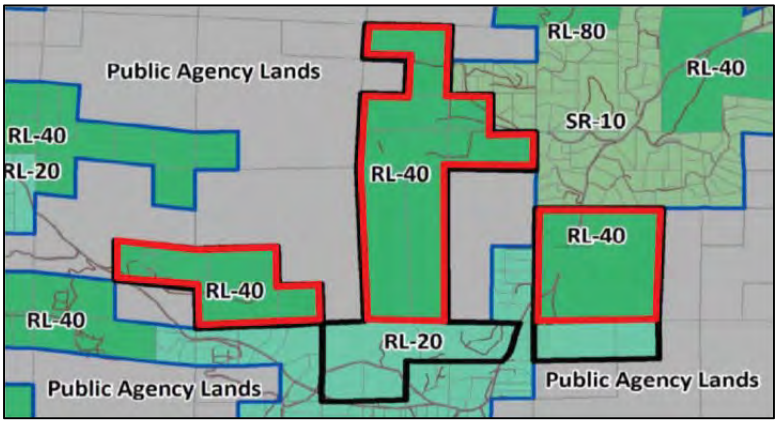


Figure B. Area of Difference: Japatul Valley

2) Eastern Alpine

The Recommended Project reduces the overall density for 1,333 acres in eastern Alpine, south of Interstate 8, shown as Area (2) on Figure A above and in more detail on Figure C.

Table 2. Land Use Distribution Comparison - Recommended to Proposed Project: Area (2)

Designation	Recommended Project		Proposed Project	
	Acres	Percent	Acres	Percent
Rural Commercial	5.9	0.4%	12.9	1.0%
Village Residential 2	151.5	11.4%	176.1	13.2%
Semi-rural 1	0.0	0.0%	518.0	38.9%
Semi-rural 2	0.0	0.0%	267.5	20.1%
Semi-rural 4	890.1	66.8%	80.8	6.1%
Semi-rural 10	0.0	0.0%	158.0	11.9%
Rural Lands 40	285.8	21.4%	120.0	9.0%
	1,333.3		1,333.3	

- *Land Use Designation* – Table 2 compares the land use distribution of the Recommended Project to the proposed Project. At 21%, the Recommended Project assigns the greatest percent as Rural Lands 40 (one dwelling unit per 40 acres), as compared to 9% under the proposed Project. Likewise, the Recommended Project assigns less Rural Commercial and Village Residential 2 (two dwelling units per acre) designations when compared to the proposed Project.
- *Potential Buildout* – The Recommended Project would reduce the potential buildout by 465 dwelling units, from 976 allowed by the proposed Project to 511 units.

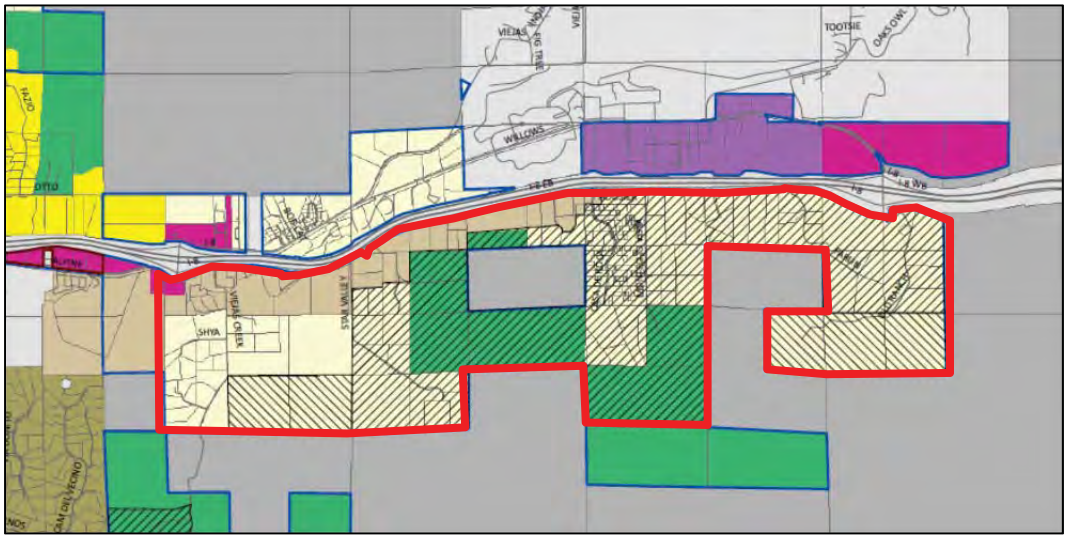


Figure C. Area of Difference: Eastern Alpine

3) End of Via Dieguenos

The Recommended Project (Area (3) on Figure A) reduces the overall density for 40 acres east of Rancho Palo Verde, when compared to the proposed Project, as described below (see also Figure D).

- *Land Use Designation* – The Recommended Project would assign two parcels (39.9 acres) a Rural Lands 40 (one dwelling unit per 40 acres) rather than the Semi-rural 2 designation (one dwelling unit per two acres) assigned under the proposed Project.
- *Potential Buildout* – The Recommended Project would reduce the potential buildout by 12 dwelling units, from 14 allowed by the proposed Project to two units.

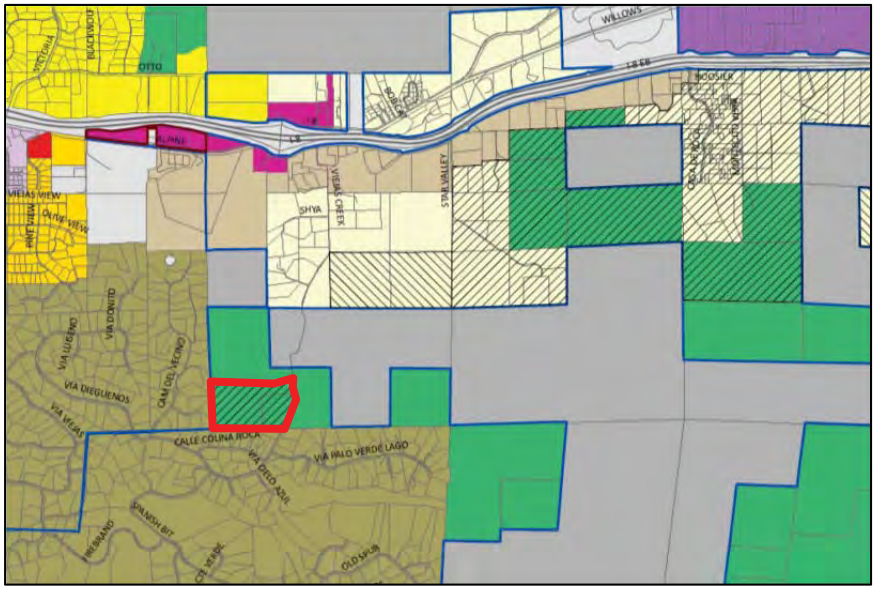
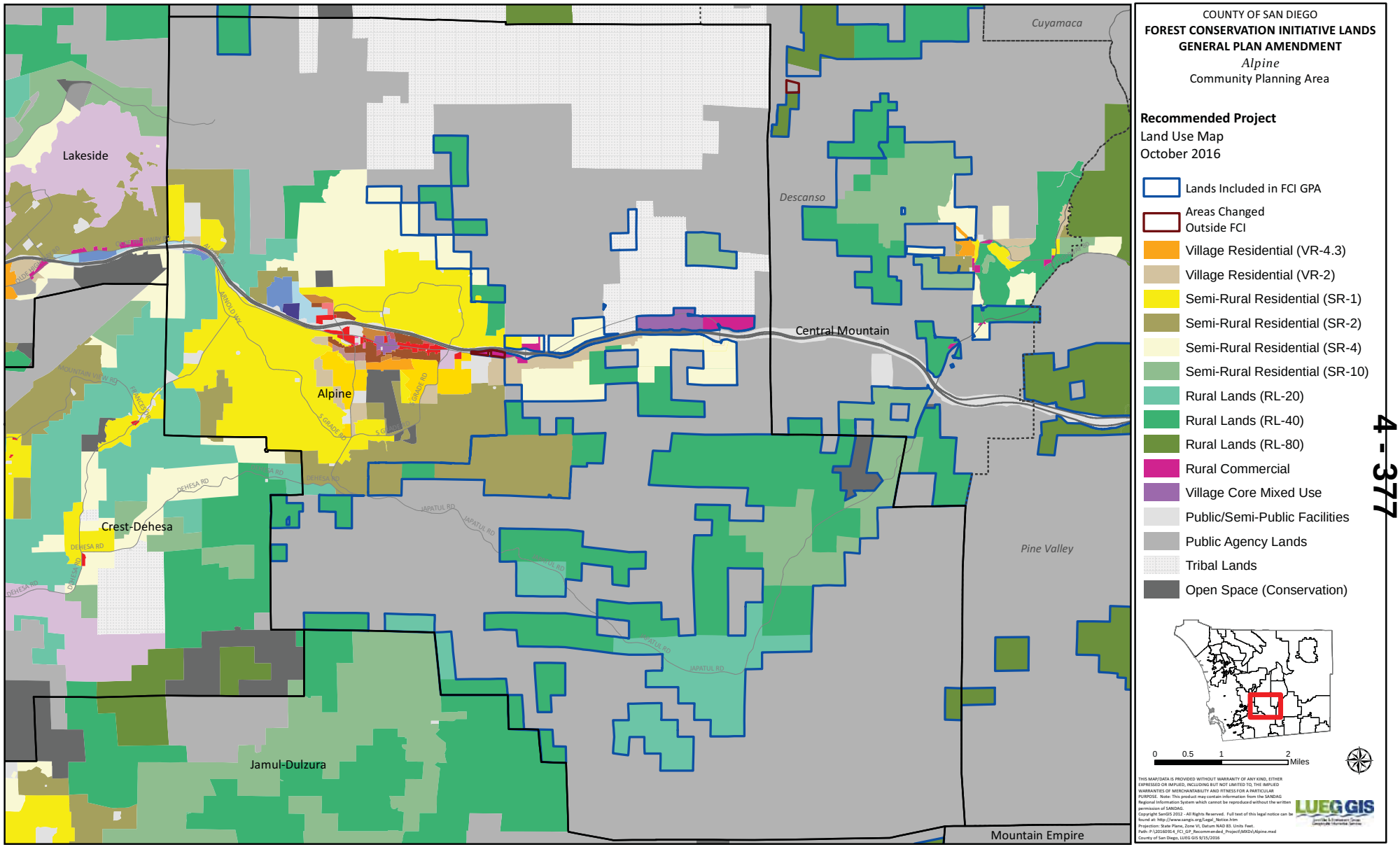


Figure D. Area of Difference: End of Via Dieguenos Area of Difference

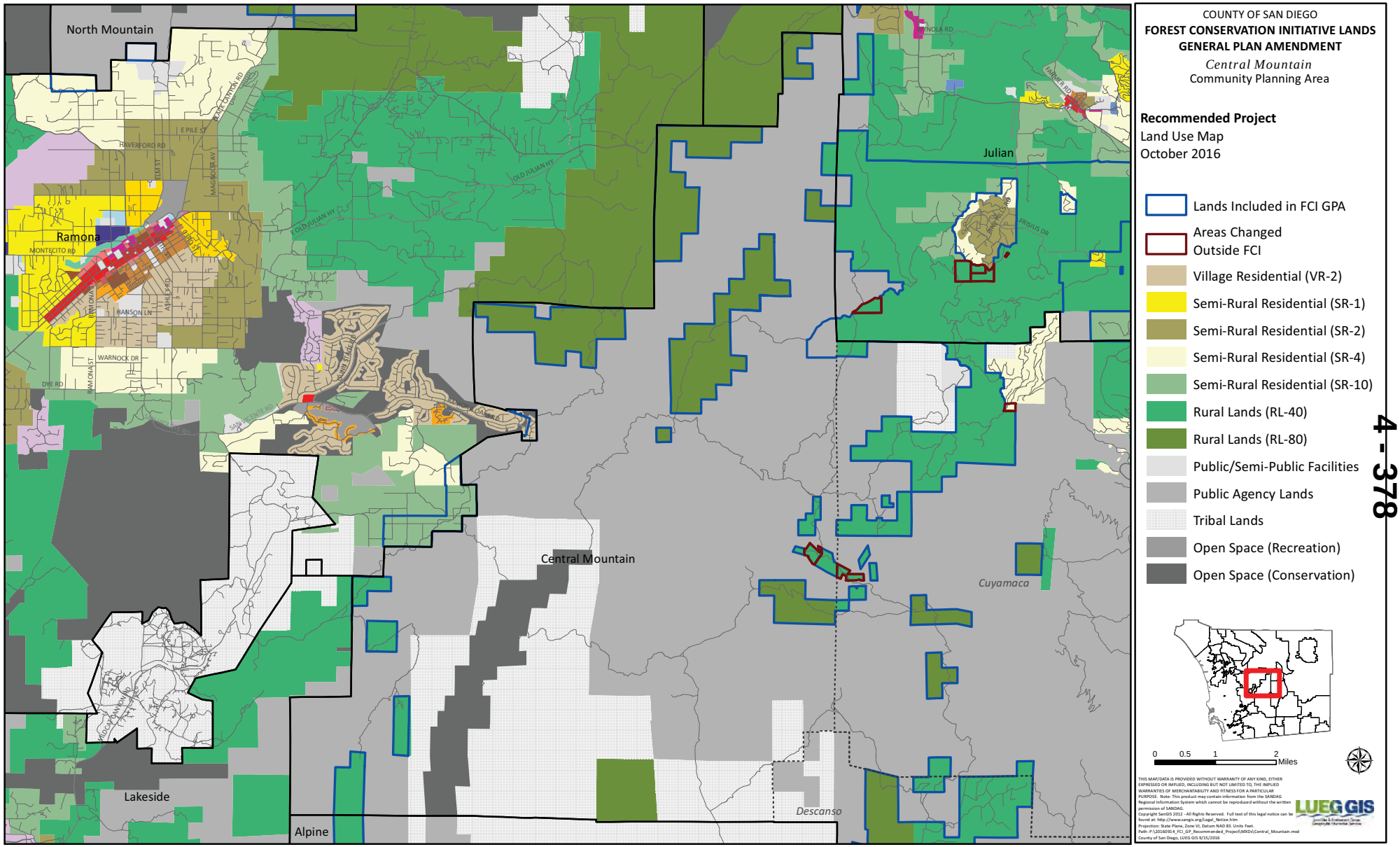
RECOMMENDED PROJECT FIGURES



Source: SanGIS, County of San Diego, 2016

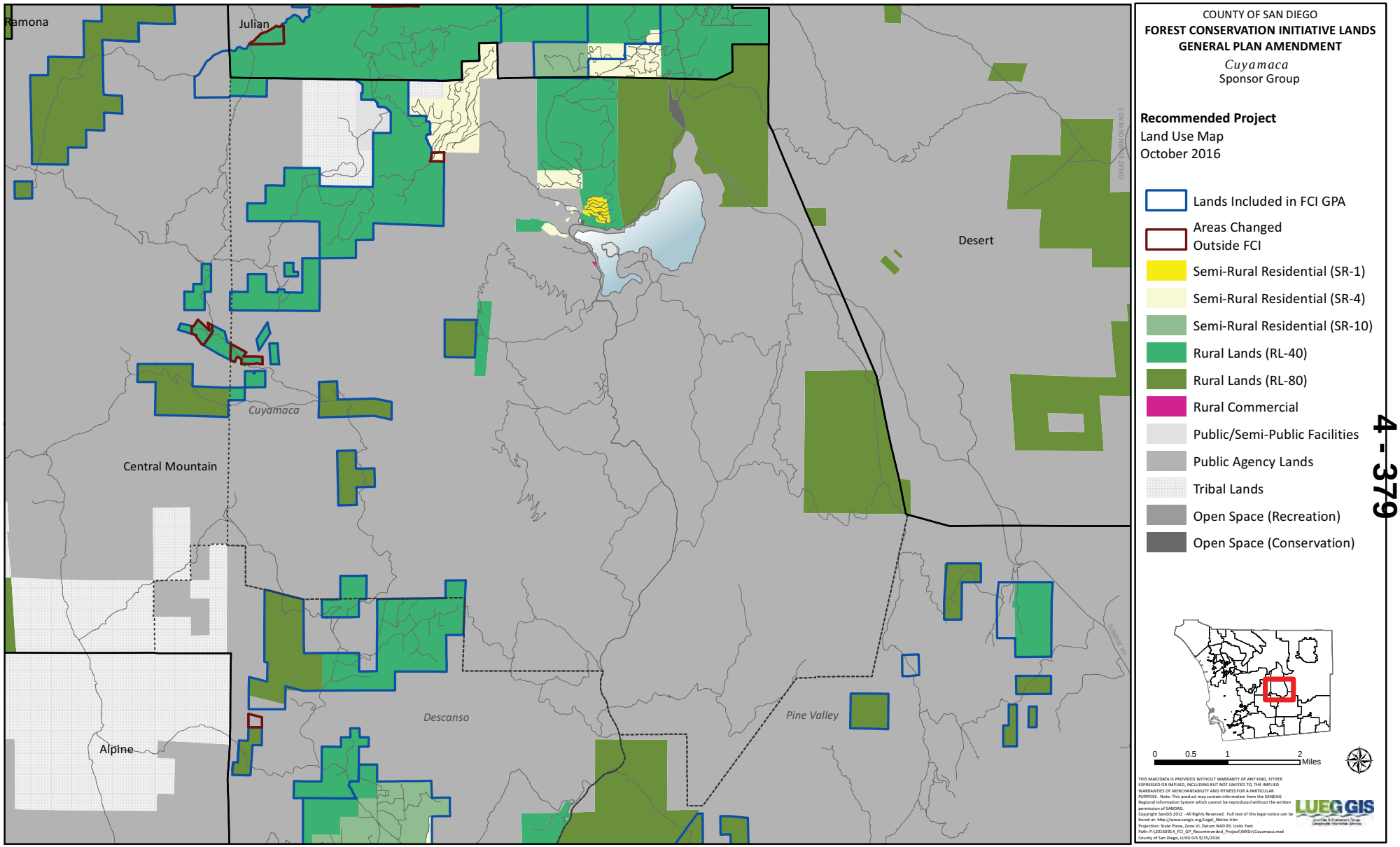
Alpine Land Use Map

Figure 1



Source: SanGIS, County of San Diego, 2016

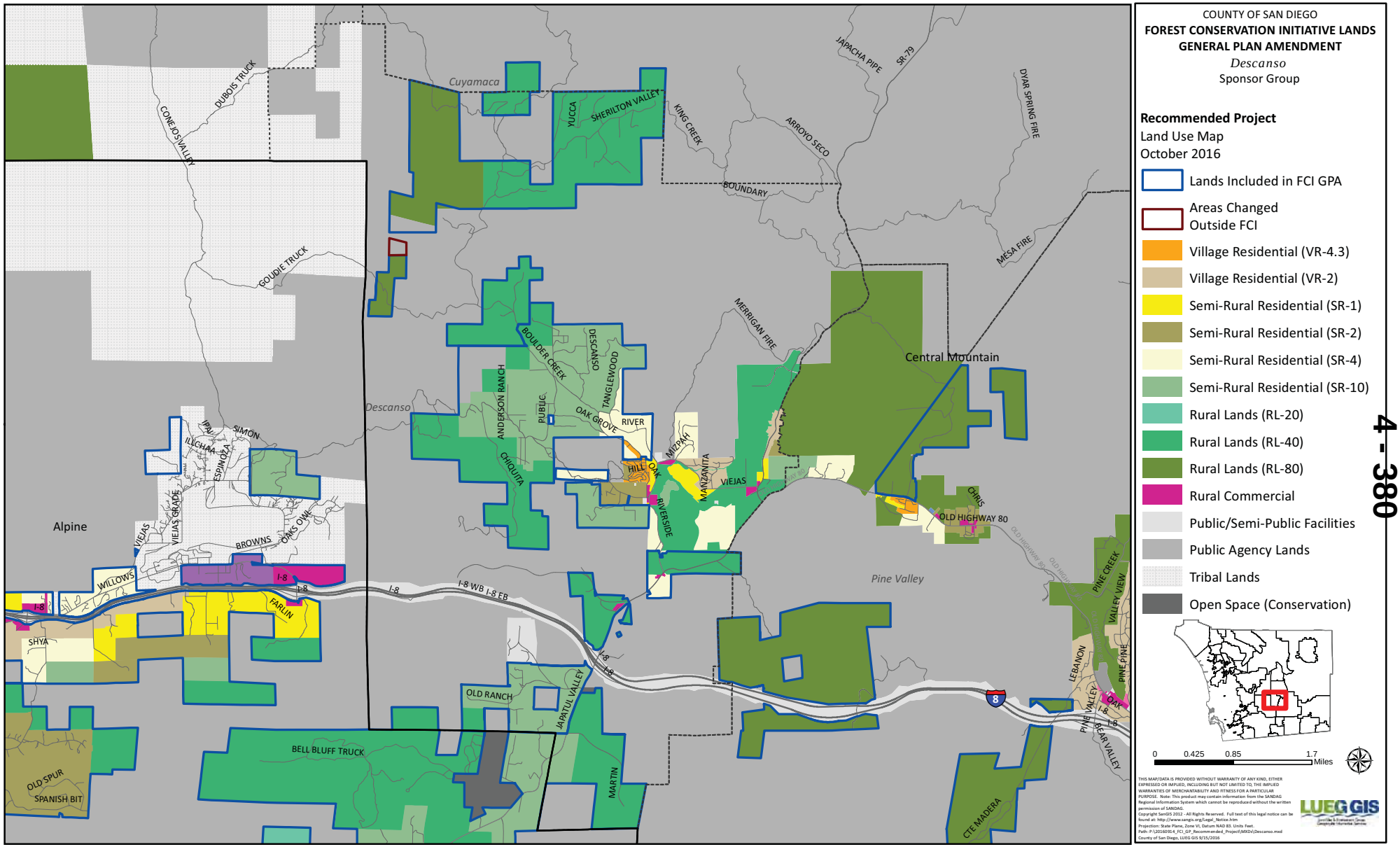
Central Mountain Land Use Map Figure 2



Source: SanGIS, County of San Diego, 2016

Cuyamaca Land Use Map

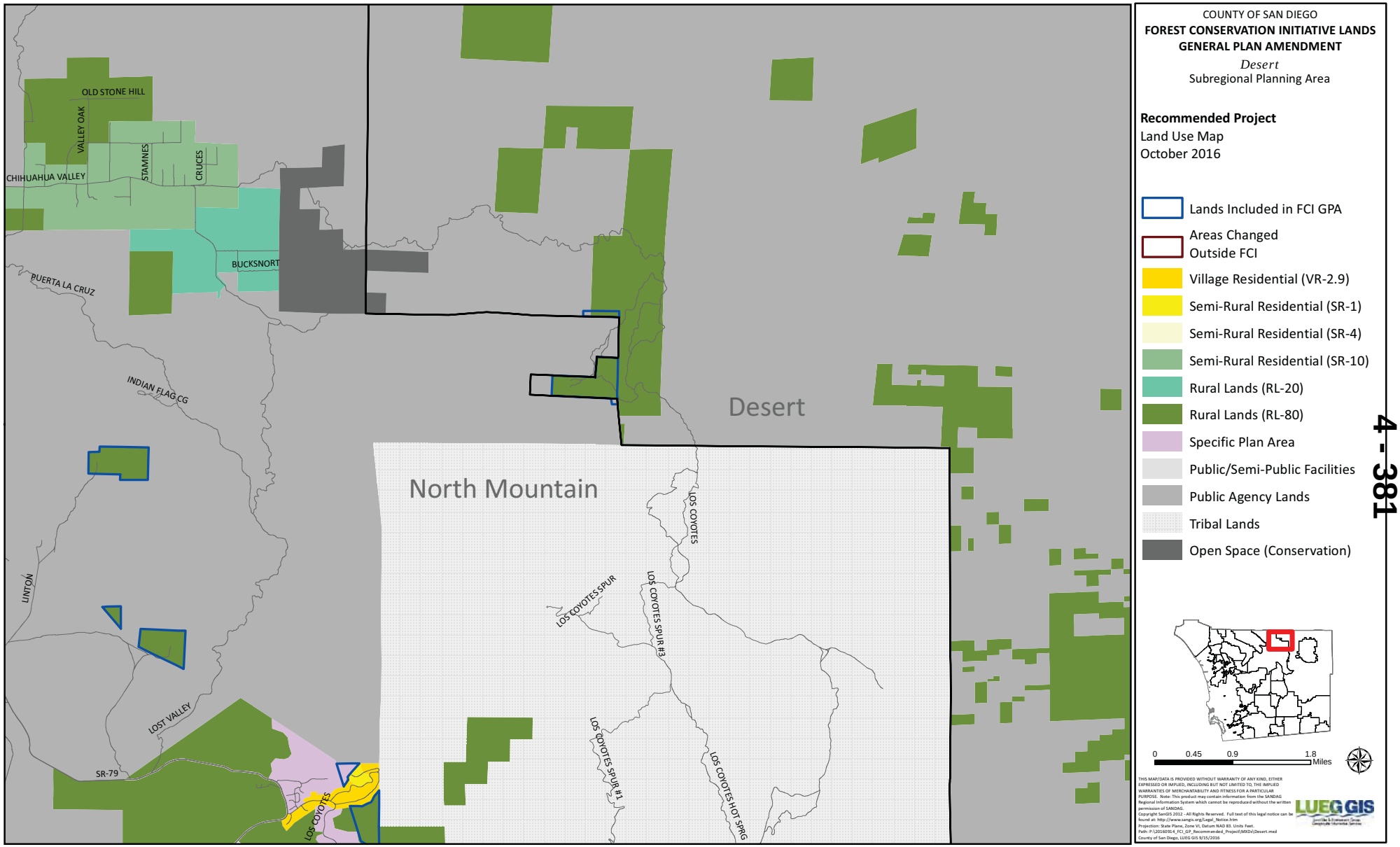
Figure 3



Source: SanGIS, County of San Diego, 2016

Descanso Land Use Map

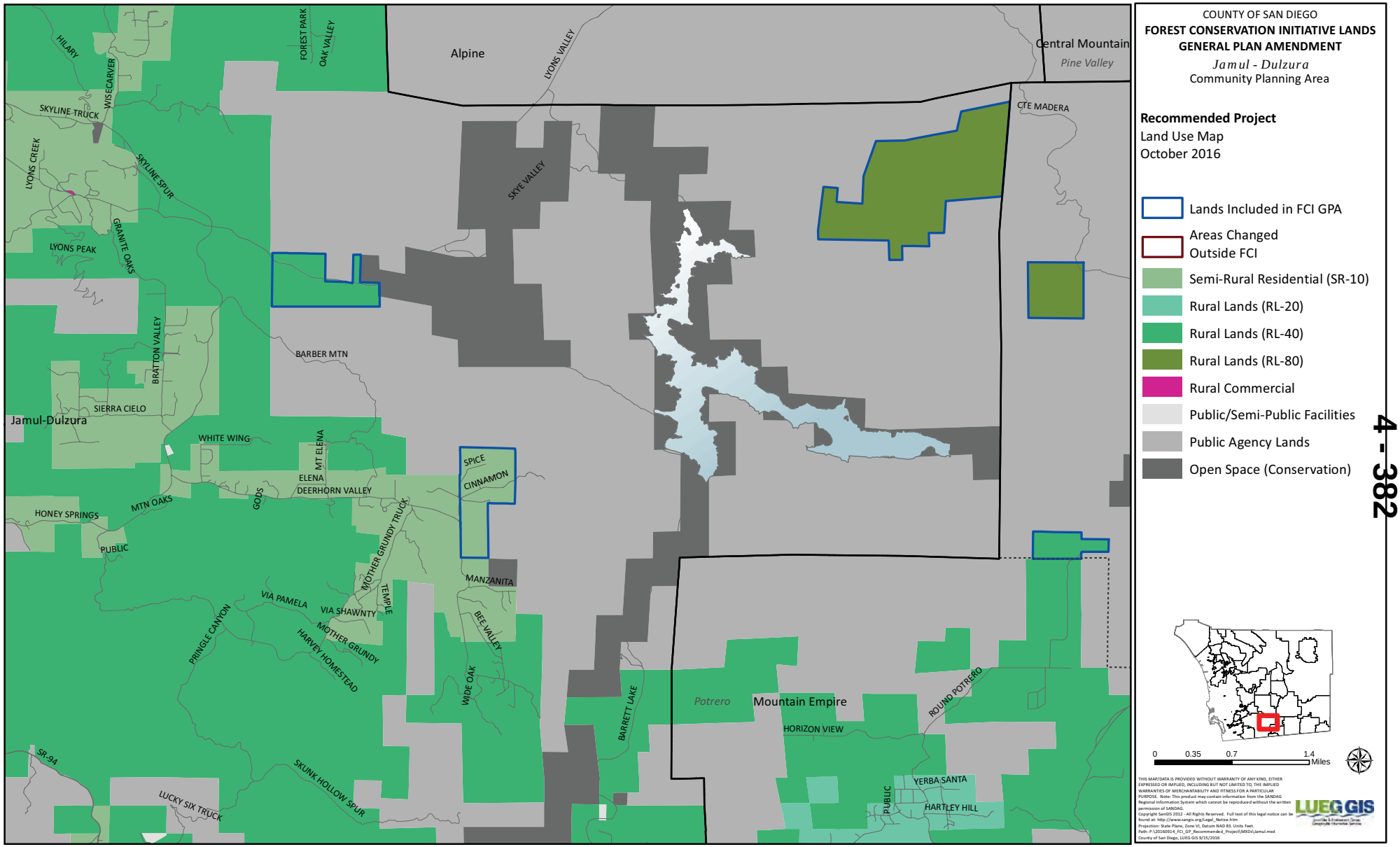
Figure 4



Source: SanGIS, County of San Diego, 2016

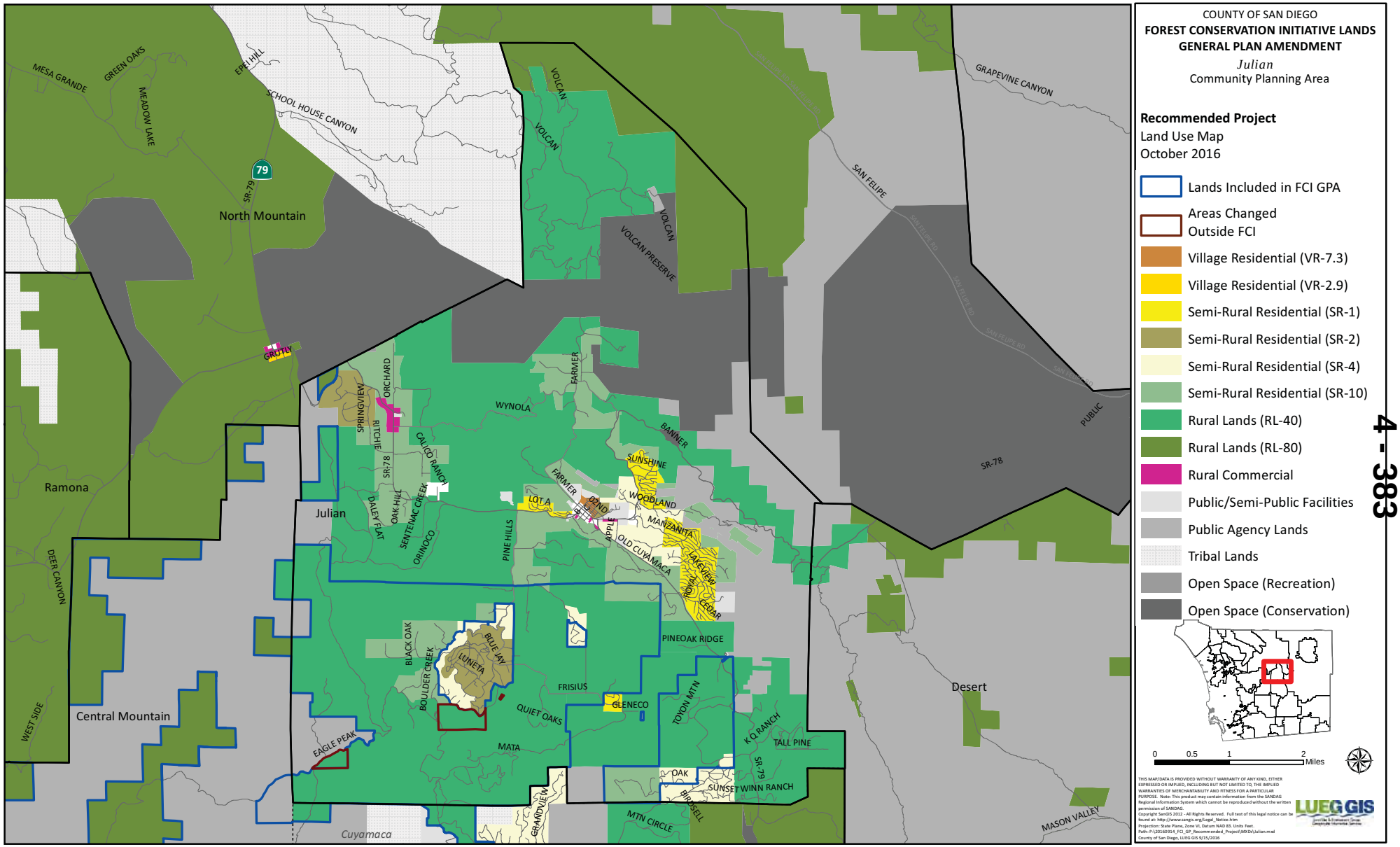
Desert Land Use Map

Figure 5



Source: SanGIS, County of San Diego, 2016

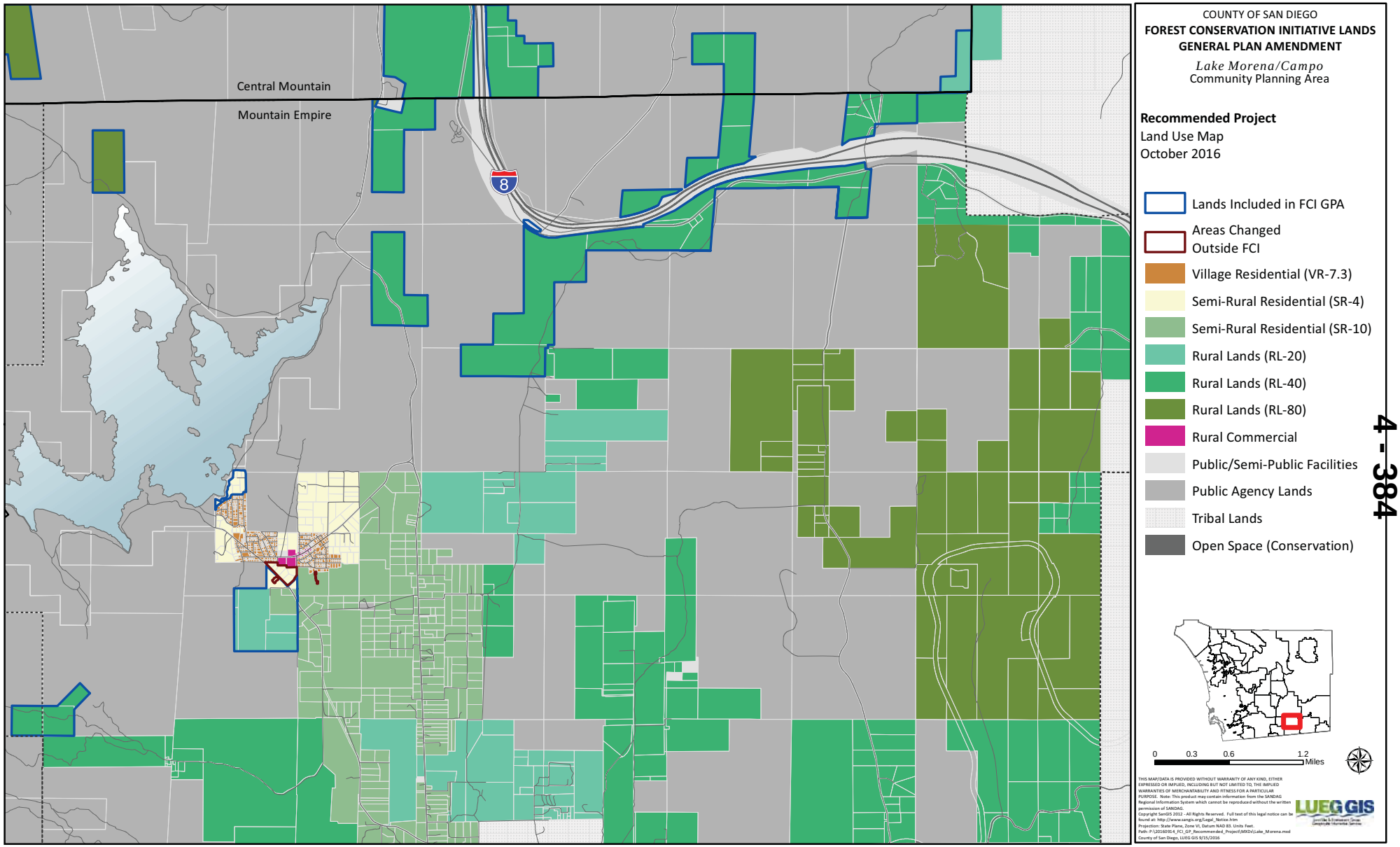
Jamul/Dulzura Land Use Map Figure 6



Source: SanGIS, County of San Diego, 2016

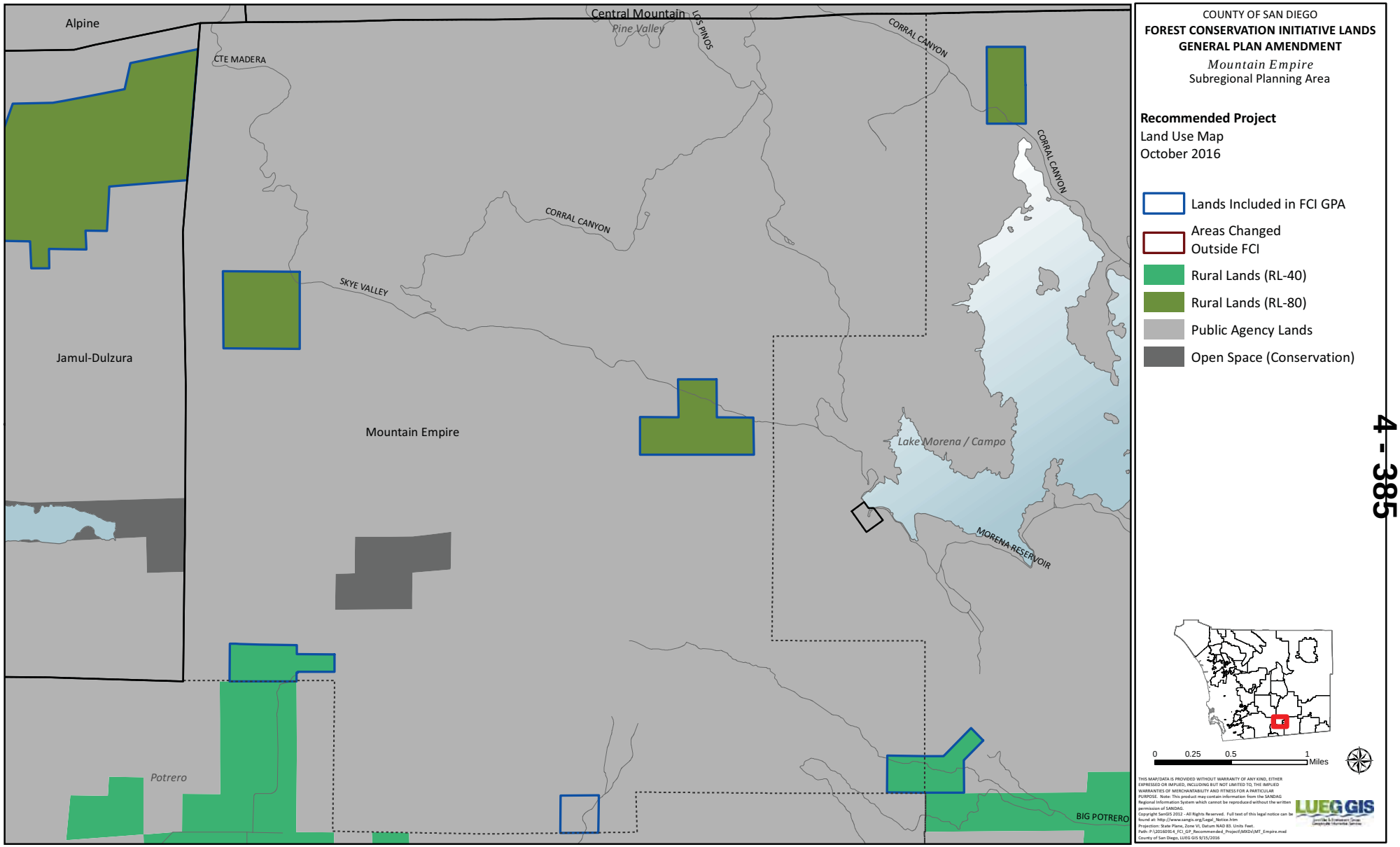
Julian Land Use Map

Figure 7



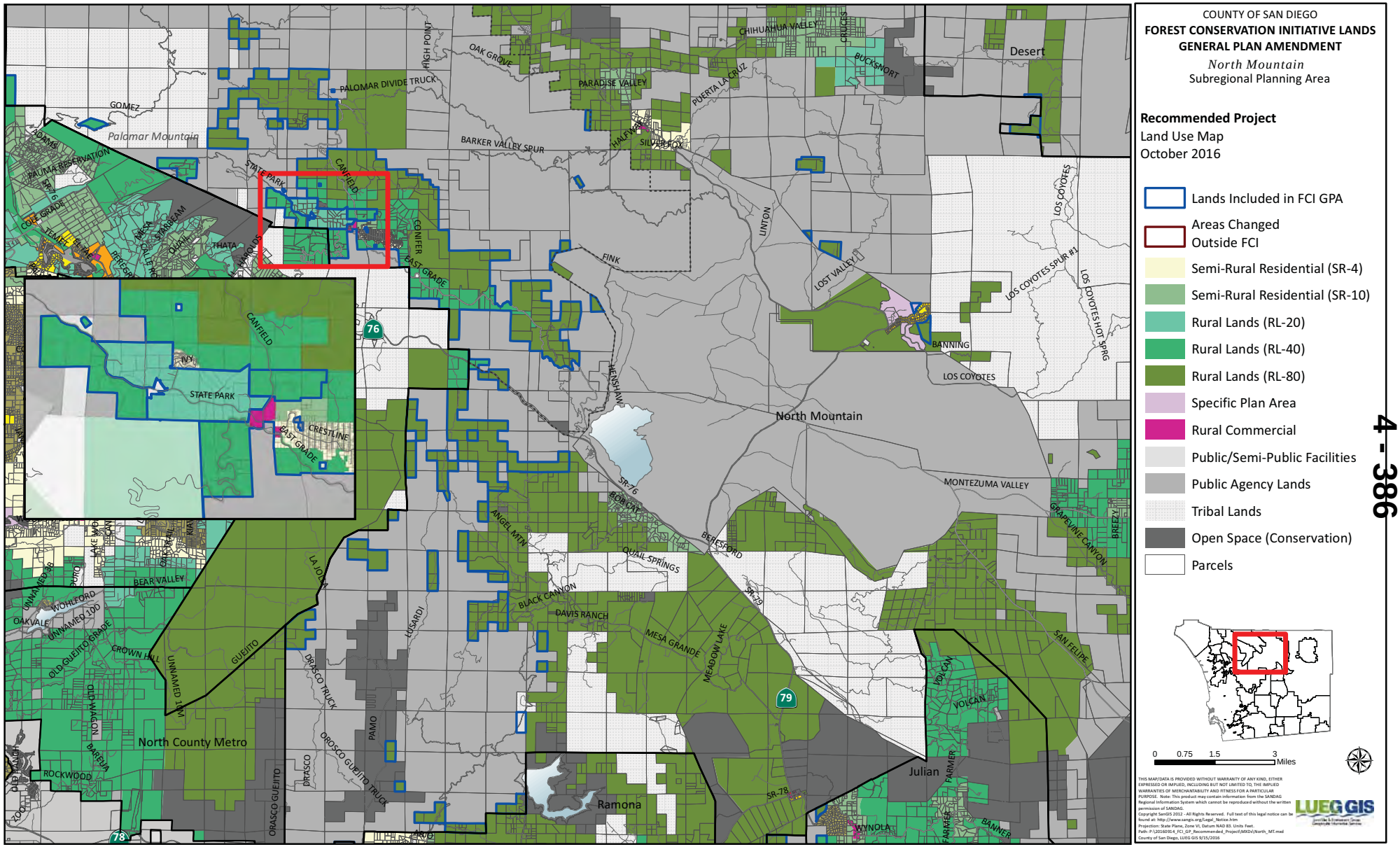
Source: SanGIS, County of San Diego, 2016

Lake Morena/Campo Land Use Map Figure 8



Source: SanGIS, County of San Diego, 2016

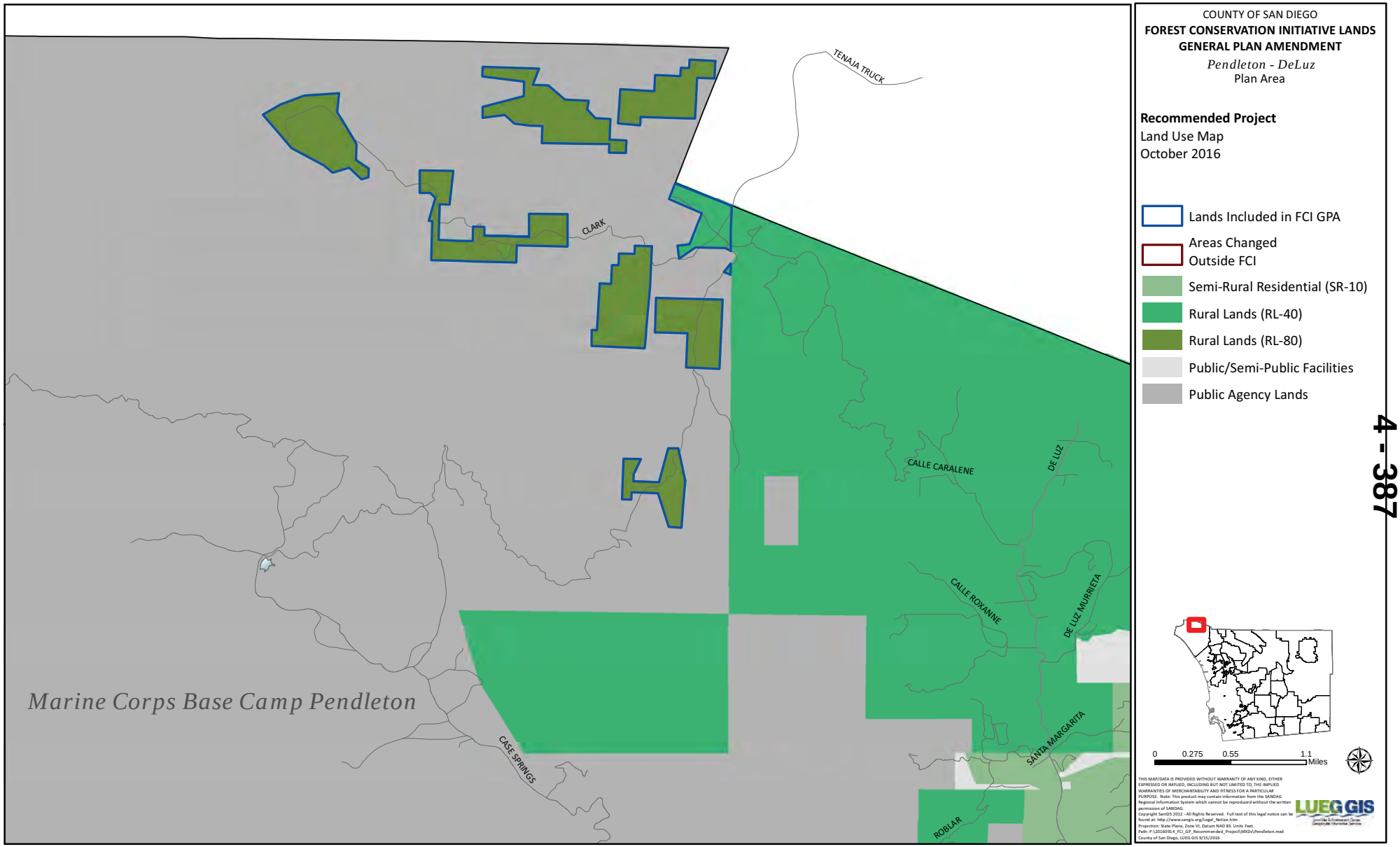
Mountain Empire Land Use Map Figure 9



Source: SanGIS, County of San Diego, 2016

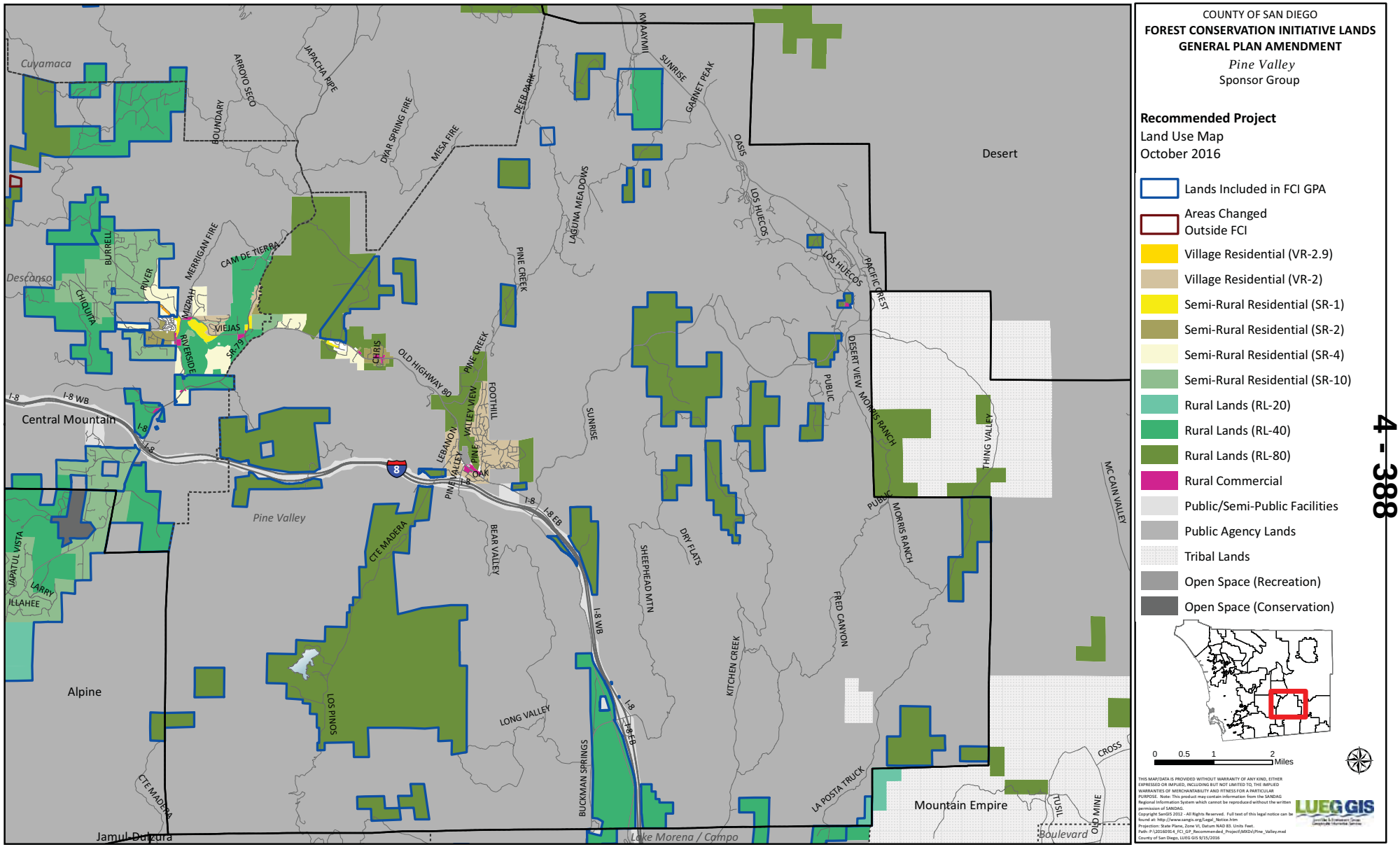
North Mountain Land Use Map

Figure 10



Source: SanGIS, County of San Diego, 2016

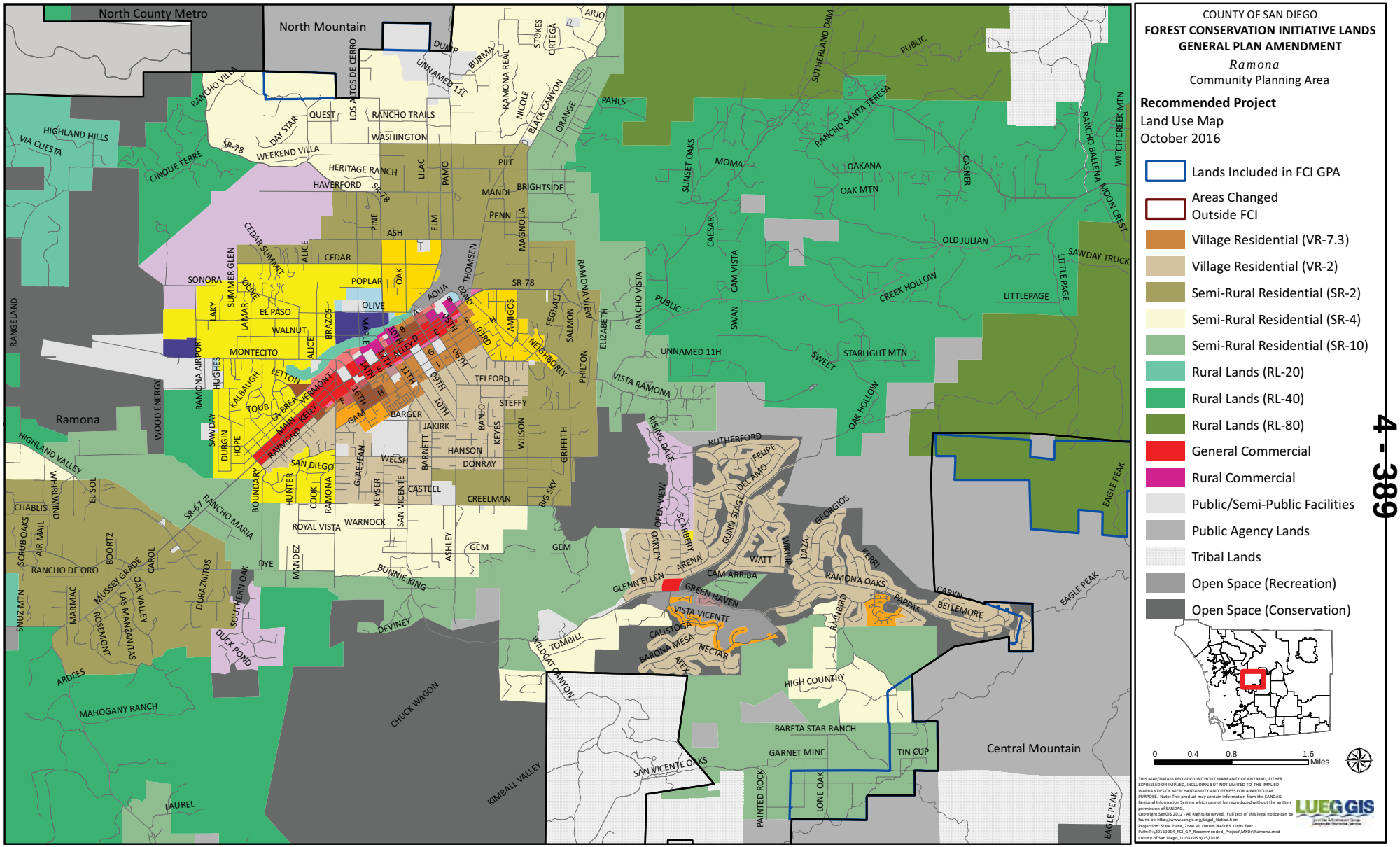
Pendleton - De Luz Land Use Map Figure 11



Source: SanGIS, County of San Diego, 2016

Pine Valley Land Use Map

Figure 12



Source: SanGIS, County of San Diego, 2016

Ramona Land Use Map Figure 13

Attachment D
Draft Final Findings

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Attachment D-1
Environmental Findings

DRAFT
Decision and Explanation Regarding Recirculation of the Draft Supplemental Environmental Impact Report for the Forest Conservation Initiative Lands General Plan Amendment

DRAFT

DRAFT DECISION AND EXPLANATION REGARDING RECIRCULATION OF THE DRAFT ENVIRONMENTAL IMPACT REPORT
Forest Conservation Initiative (FCI) Lands
General Plan Amendment (GPA) SCH # 2012081082

Pursuant to California Environmental Quality Act (CEQA) Guidelines, Section 15088.5(a), the County of San Diego is required to recirculate a Draft Environmental Impact Report (EIR) when significant new information is added to the Draft EIR after public review of the Draft EIR, but before certification. "Information" can include changes in the project or environmental setting, as well as additional data or other information. New information added to a Draft EIR is not significant unless the Draft EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse effect of the project or a feasible way to mitigate or avoid such an effect (including feasible alternatives) that the project's proponents have declined to implement. "Significant new information" can include:

1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project's proponents decline to adopt it.
4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

BACKGROUND: The Draft Supplemental Environmental Impact Report (SEIR) was first circulated for public review from February 1, 2013 to March 18, 2013 (a 45-day review period). All interested persons and organizations had an opportunity during this time to submit their written comments on the Draft SEIR to the County of San Diego. In response to comments received from the circulation of the Draft SEIR and direction provided by the County Board of Supervisors at a hearing on June 25, 2014, several additions or changes were made to the proposed FCI Lands GPA project description and analysis.

Revisions to the proposed Project resulted in the identification of new or different significant environmental impacts since the Draft SEIR was circulated in 2013 to some resource areas. These include: Aesthetics, Agricultural Resources, Air Quality, Biological Resources, Hazards (wildland fires), Hydrology and Water Quality, Mineral Resources, Noise, Public Services, Transportation and Traffic, Utilities and Service Systems, and Climate Change.

Due to those additions and changes made to the Draft SEIR, the County decided to recirculate the Draft SEIR for the FCI Lands GPA project. Pursuant to CEQA Guidelines Section 15088.5(f)(1), interested members of the public and agencies were required to submit new comments on the Recirculated Draft SEIR.

The Recirculated Draft SEIR was recirculated on January 14, 2016 for a 45-day public review. The County received numerous comments, some of which stated that the County should add more information to the Draft EIR. Responses to all comments received during the public review period were prepared and are included in Volume II of the Final SEIR.

In response to the comments, the County made changes to several sections of the Draft SEIR. All modifications were evaluated to determine whether new or more severe impacts were

identified, or whether feasible mitigation or avoidance measures were identified but rejected. Subsequent to the Planning Commission and Board of Supervisors hearings, the County also added an amendment to the SEIR to describe the Recommended Project, which is the Alpine Alternative Land Use Map alternative analyzed in the 2016 Draft SEIR. The Recommended Project has less environmental impacts when compared to the proposed Project that was analyzed in the 2016 Draft SEIR and is the Project alternative presented to the decision makers for consideration.

DECISION: The Board of Supervisors has reviewed the changes made to the Draft SEIR following public review, and determines that no "significant new information" has been added and therefore, recirculation of the Draft SEIR is not required. The following provides an explanation of the modifications made to the Draft SEIR.

EXPLANATION: The changes to the Draft SEIR subsequent to the public review period are shown in strike-out in Volume I of the Final SEIR and a complete summary of changes is included within Volume II of the Final SEIR. While an exhaustive list of changes is not included here, the following provides an explanation of relevant changes to the Project description, the environmental impacts analysis, the mitigation measures. Revisions to the SEIR were made in response to comments made during public review.

Changes to the Project Description of the Proposed Project

In response to comments, the following changes were made to the description of the Proposed Project that was analyzed in the EIR. Changes are shown in strikeout/underlined text.

- Pages 1-13 to 1-14, Table 1-1C, Proposed Project Buildout and Additional Subdivision Potential, has been added a description of the new table has been added as follows:

The full potential buildout that would be allowed under the proposed Project is shown in Table 1-1A (see last column). Table 1-1C shows the potential number of additional residential lots that would be allowed under both the proposed Project and existing General Plan (No Project Alternative). This Table shows that, while the proposed Project would allow 6,245 lots at buildout, only 2,395 of these lots would be in addition to existing lots. This is substantially less potential lots than would be allowed by the existing General Plan, where 15,062 lots would result with full buildout, 11,212 of which would be in addition to existing lots.

- Page 1-44, text describing the AB 52 consultation has been added, as follows:

Assembly Bill 52 was enacted in 2014, with several provisions governing tribal cultural resources and early consultation with tribes. Assembly Bill 52 applies to EIRs for which the notice of preparation is issued after July 1, 2015. The notice of preparation for this EIR was issued in September 2012, so Assembly Bill 52 does not apply to this EIR. Nevertheless, the County elected to conduct consultation consistent with Assembly Bill 52. That consultation was initiated concurrent with the public review of the recirculated Draft SEIR in January 2016. The County consulted with the Viejas and Rincon Native American tribes and provided a status of the Project, emphasized that this project consists of changes to the General Plan and Community Plan and does not include any earth disturbing activities as subsequent discretionary permits will require CEQA review and consultation.

Environmental Analysis Changes

The Final SEIR includes modifications to the analysis of environmental impacts in Chapter 2, Environmental Effects of the Proposed Project, and Chapter 4, Project Alternatives. These

changes are associated with comments received during public review of the Draft SEIR. The complete list of changes is available in Volume II of the Final SEIR. The following notable changes are related to the environmental impacts of the proposed Project and the alternatives.

Section 2.4, Biological Resources

- Page 2.4-3, edits to the paragraph at the top of the page have been made, as follows:

This proposed Project consists of changes to the land use designations over 71,700 acres of land which support special status plant and wildlife species. Similar to the 2011 General Plan, the project would directly or indirectly impact habitats of candidate, sensitive, or special status species. The General Plan Update PEIR included a discussion of each vegetation community in the unincorporated County and the species supported by each vegetation community in Section 2.4.1.2 of the General Plan Update PEIR. Table 2.4-1 (Habitat Impacts by Vegetation Community) ~~quantifies~~ compares the total number of acres of each vegetation community with the number of acres that could be potentially affected by new development under the proposed Project…….

- Page 2.4-3, edits to the paragraph at the top of the page have been made, as follows:

Figures 2.4-1A and 2.4-1B illustrates the location of the vegetation communities within the Project area boundary and estimates of the vegetation impacts are shown in Figure 2.4-2A and 2.4-2B in addition to Table 2.4-1. Also, community level figures of the estimated vegetation impacts are provided as Figures 2.4-5.1 through 2.4-5.13 (Estimated Vegetation Impacts). …….

- Page 2.4-5, edits to paragraph #4 have been made, as follows:

Rural lands (RL-20, RL-40 and RL-80) are estimated to have five acres of impact per potential dwelling unit. A 25% impact is identified for areas assigned a RL-20 designation, a 12.5% impact for areas assigned a RL-40 designation and a 6% impact for areas assigned RL-80, based on a five-acre per dwelling unit assumption for lands outside the MSCP Area. Within PAMA, the potential impact is 2.5 acres per dwelling unit.

- Page 2.4-5 to 2.4-6, a new paragraph at the bottom of the page has been added, as follows:

Table 2.4-3 (Level of Impact: MSCP Parcels) identifies, by potential level of impact, the number of parcels and acres within the South County, draft North County and in-process East County MSCP. This table shows that of the 53,919 acres within MSCP PAMA and preserves, only 12,547 acres would have any subdivision potential under the proposed Project. Table 2.4-4 (Level of Impact: Parcels Adjacent to Conserved Lands) identifies the potential level of impact to parcels adjacent to conserved lands. This table shows that of the 10,264 acres adjacent to conserved lands and preserves, only 2,628 acres would have any subdivision potential under the proposed Project.

- Page 2.4-8 to 2.4-9, edits to the paragraph at the bottom of the page have been made, as follows:

The proposed Project's direct, indirect and cumulative impacts would be reduced by the same regulations, implementation programs (2011 General Plan goals/policies) and mitigation measures from the General Plan Update PEIR and repeated in Section 2.4.4.4 below. However, implementation of the mitigation measures listed in Section 2.4.4.4 would not reduce these impacts to below a level of significance. Implementation of the MSCP,

County of San Diego ~~While the direct and cumulative impacts within the South County MSCP will be mitigated below a level of significance through implementation of the~~ Subarea Plan and the Biological Mitigation Ordinance will provide for mitigation of the direct and cumulative impacts within the Subarea Plan area (southwestern portion of the county). For the northwestern and eastern portions of the county, ~~the North County and East County~~ MSCP Plans have ~~are~~ not yet adopted. As such, any contribution to the cumulative loss of wildlife corridors in the draft North and East County Plan areas would be cumulatively considerable, even after mitigation has been implemented for individual projects. It should be noted; however, that an interim North and East County MSCP Planning Agreement (dated October 29, 2008~~May 16, 2014~~) is in place between the County, the CDFW, and the USFWS. Among other things, this agreement establishes a process to review interim development within the Planning Areas that will help achieve the preliminary conservation objectives and preserve options for establishing a viable reserve system or equivalent long-term conservation measures, but until those MSCP Plans are completed and approved, the proposed Project would result in significant and unavoidable direct, indirect and cumulative impacts on wildlife corridors and nursery sites.

- Pages 2.4-19 to 2.4-20, a column titled “Total Acres” has been added to Table 2.4-1.
- Page 2.4-22, a new table titled “2.4-3 Level of Impact: MSCP Parcels” has been added:
- Page 2.4-22, a new table titled “2.4-4 Level of Impact: Parcels Adjacent to Conserved Lands” has been added:
- Figures 2.4-2A and 2.4-2B have been amended to include potential impacts to East County in-process MSCP Focused Conservation Areas, along with other conserved lands. In addition, the <25%impact category has been expanded into two categories: (1) <12.5% and (2) 25%.
- Figures 2.4-4.1 through 2.4-4.13 have been added that show similar information shown on Figures 2.4-2A and 2.4-2B, but at the community level. In addition, these more detailed maps also show Biological Core Resource Areas and designated wildlife corridors and linkages.

Section 2.5, Cultural Resources

- Page 2.5-14, Mitigation Measure Cul-2.6 has been revised as follows:

Protect significant cultural resources by facilitating the identification and acquisition of important resources through regional coordination with agencies, and institutions, such as the SCIC and consultation with the NAHC and local tribal governments, including SB-18 and AB-52 review, while maintaining the confidentiality of sensitive cultural information.

Section 2.15, Global Climate Change

- Page 2.15-20, the following has been added to the last paragraph:

The applicable mitigation measure that would implement the policy is shown in brackets at the end of each policy.

- Page 2.15-21, the applicable mitigation measure has been added to the end of each policy as shown below:

Policy COS-10.7: Recycling of Debris. Encourage the installation and operation of construction and demolition (C&D) debris recycling facilities as an accessory use at

permitted (or otherwise authorized) mining facilities to increase the supply of available mineral resources. [CC-1.19]

Policy COS-15.1: Design and Construction of New Buildings. Require that new buildings be designed and constructed in accordance with "green building" programs that incorporate techniques and materials that maximize energy efficiency, incorporate the use of sustainable resources and recycled materials, and reduce emissions of GHGs and toxic air contaminants. [CC-1.1]

Policy COS-15.2: Upgrade of Existing Buildings. Promote and, as appropriate, develop standards for the retrofit of existing buildings to incorporate architectural features, heating and cooling, water, energy, and other design elements that improve their environmental sustainability and reduce GHG. [CC-1.9]

Policy COS-15.3: Green Building Programs. Require all new County facilities and the renovation and expansion of existing County buildings to meet identified "green building" programs that demonstrate energy efficiency, energy conservation, and renewable technologies. [CC-1.1, CC-1.16, CC-1.18]

Policy COS 17.1: Reduction of Solid Waste Materials. Reduce greenhouse gas emissions and future landfill capacity needs through reduction, reuse, or recycling of all types of solid waste that is generated. Divert solid waste from landfills in compliance with State law. [CC-1.6, CC-1.17]

Policy COS 17.5: Methane Recapture. Promote efficient methods for methane recapture in landfills and the use of composting facilities and anaerobic digesters and other sustainable strategies to reduce the release of GHG emissions from waste disposal or management sites and to generate additional energy such as electricity. [USS-6-7 in GPU FEIR]

Policy COS-18.2: Energy Generation from Waste. Encourage use of methane sequestration and other sustainable strategies to produce energy and/or reduce GHG emissions from waste disposal or management sites. [CC-1.9]

Policy COS 20.2: GHG Monitoring and Implementation. Establish and maintain a program to monitor GHG emissions attributable to development, transportation, infrastructure, and municipal operations and periodically review the effectiveness of and revise existing programs as necessary to achieve GHG emission reduction objectives. [CC-1.3]

Policy COS 20.4: Public Education. Continue to provide materials and programs that educate and provide technical assistance to the public, development professionals, schools, and other parties regarding the importance and approaches for sustainable development and reduction of GHG emissions. [CC-1.14]

- Page 2.15-25, add the following two sentences to the end of the last paragraph on the page, as follows:

CC-20 requires the County to continue to maintain and monitor inactive solid waste disposal sites to ensure compliance with environmental regulations to minimize GHG emissions. CC-21 requires the County to streamline regulations that encourage the use of alternative energy systems, such as photovoltaics and wind.

Chapter 4.0, Project Alternatives

- Page 4-7, for added clarification a title has been added to the table on this page, as follows:

Comparison of Alternatives to the FCI Condition

- Page 4-15, the following has been added to the end of the second paragraph under "City-Centered Alternative:"

Therefore, the County finds it would be infeasible to consider this alternative given the following:

- The high potential for the additional development to result in increased impacts to air quality, traffic, noise and community character in the cities where it is being added; and
- The County does not have any land use jurisdiction in the cities to ensure that the additional development would be approved.

Changes to Appendix F, Greenhouse Gas Emissions Calculations

- Page F-4, Table 5 has been added showing projected fuel consumption for each analysis year.

Changes to Mitigation Measures

The minor change was made to Mitigation Measure Cul-2.6, as follows:

- Page 2.5-14, Mitigation Measure Cul-2.6 has been revised, as shown below, to recognize the change in State law since the NOP for this SEIR that requires AB-52 tribal consultation, in addition to SB-18 consultations.

Protect significant cultural resources by facilitating the identification and acquisition of important resources through regional coordination with agencies, and institutions, such as the SCIC and consultation with the NAHC and local tribal governments, including SB-18 and AB-52 review, while maintaining the confidentiality of sensitive cultural information.

CONCLUSION: Modifications to the Draft SEIR for inclusion in the Final SEIR do not constitute "significant new information" as defined in Section 15088.5 of the State CEQA Guidelines. The modifications shown above and provided in SEIR Volumes I and II do not show:

1) New significant environmental impacts from the Project or from new mitigation measures;
2) A substantial increase in the severity of environmental impacts;
3) Feasible project alternatives or mitigation measures considerably different from others previously analyzed that would clearly lessen the significant environmental impacts of the project, but which the Project proponents decline to adopt; or
4) That the Draft SEIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

The changes merely clarify the information in the Draft SEIR or make minor modifications. The new table provided in Appendix F is derived from information contained in the Draft SEIR (SEIR Appendix F tables on pages F-26 and F-29), which set forth vehicle miles traveled (VMT by fuel type. The information provides clarification regarding the amount of fuel used based on VMT and fuel type, and goes beyond what is required for the programmatic analysis provided in the SEIR.

As such, the County's decision not to recirculate the SEIR would not deprive the public of a meaningful opportunity to comment on substantial adverse effects or feasible mitigation measures or alternatives. The described revisions in the Final SEIR therefore do not require recirculation.

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Attachment D-2
Environmental Findings

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CEQA Findings Regarding Significant Effects for the Forest Conservation Initiative Lands General Plan Amendment

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DRAFT CEQA FINDINGS REGARDING SIGNIFICANT EFFECTS FOR THE FOREST CONSERVATION INITIATIVE LANDS GPA
SCH # 2012081082

The following Findings are made for the Forest Conservation Initiative Lands GPA (Project). The project is recommended for approval by staff based on consideration of the alternatives, Project objectives, Project benefits, environmental impacts, stakeholder input, Planning Commission hearings, Board of Supervisor hearings, and numerous other factors. The environmental effects of the Project are addressed in the Supplemental Environmental Impact Report (SEIR) dated October of 2016, which is incorporated by reference herein. As is permitted by California Public Resources Code Section 21094(a), the Project tiers from the San Diego County General Plan and the General Plan Update Program EIR (PEIR) adopted on August 3, 2011.

The Final Environmental Impact Report (FEIR) prepared for the Project consists of three volumes:

- Volume 1: Draft Final Supplemental EIR evaluating the proposed Project and a reasonable range of alternatives
- Volume 2: Summary of Changes to the Draft EIR, Comment Letters and Responses to Comments on the Draft EIR
- Volume 3: Amendment to the EIR, Description of the Recommended Project

The FEIR evaluated potentially significant effects for the following environmental areas of potential concern: 1) Aesthetics; 2) Agricultural and Forestry Resources; 3) Air Quality; 4) Biological Resources; 5) Cultural And Paleontological Resources; 6) Hazards and Hazardous Materials; 7) Hydrology and Water Quality; 8) Land Use; 9) Mineral Resources; 10) Noise; 11) Public Services; 12) Recreation; 13) Transportation and Traffic; 14) Utilities and Service Systems, and 15) Global Climate Change. Potential impacts with regard to Geology/Soils and Population/Housing are identified as Effects Found Not to be Significant (and discussed in Section 3.2 of Volume 1 of the FEIR), similar to the determinations made in the General Plan Update PEIR for these issues.

Of these fifteen environmental subject areas, the County Board of Supervisors (Board) concurs with the conclusions in the FEIR that the environmental issues evaluated will include impacts that are significant and unavoidable with the exception of the following three subject areas in which all impacts will be mitigated below a level of significance: Cultural and Paleontological Resources, Land Use, and Recreation. For those areas in which environmental impacts will remain significant and unavoidable, even with the implementation of mitigation measures, the Board has determined that certain overriding considerations exist which make the impacts acceptable.

The California Environmental Quality Act (CEQA) (California Public Resources Code §21000 *et. seq.* and the State CEQA Guidelines (Title 14, California Code of Regulations, §15000 *et. seq*.)

require that no public agency shall approve or carry out a project which identifies one or more significant environmental effects of a project unless the public agency makes one or more written findings for each of those significant effects, accompanied by a brief explanation of the rationale for each finding.

The possible findings are:

(1) Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant environmental effects on the environment;

(2) Those changes or alterations are within the responsibility and jurisdiction of another public agency and have been or can or should be adopted by that other agency; or

(3) Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the EIR (CEQA, §21081(a); Guidelines, §15091(a)).

For each significant effect identified for the Project, one of the above three findings applies. Therefore, the discussion of significant impacts (and mitigation measures where possible), are organized below by finding rather than by environmental subject area.

Section A – Finding (1)

Pursuant to Section 15091(a)(1) of the State CEQA Guidelines, the County of San Diego Board of Supervisors finds that, for each of the following significant effects as identified in the FEIR, changes or alterations (Mitigation Measures) have been required in, or incorporated into, the Project which avoid or substantially lessen each of the significant environmental effects as identified in the FEIR. The significant effects (Impacts) and Mitigation Measures are stated fully in the FEIR. The following section identifies all issue areas in the EIR for which changes or alternations (Mitigation Measures) have been required in, or incorporated into, the Project which avoid or substantially lessen each of the significant environmental effects as identified in the FEIR. The rationale for this finding for each Impact is as follows:

AESTHETICS

A-1 **Significant Effect – Scenic Vistas**: The FEIR identifies potentially significant impacts associated with the potential obstruction, interruption, or detraction of a scenic vista as a result of future development activity within the former Forest Conservation Initiative (FCI) lands and approximately 400 acres of unincorporated lands adjacent to the former FCI lands (herein referred to as the Project areas). This impact of the Project would be reduced to a less than significant level through implementation of identified General Plan policies and mitigation measures.

Mitigation Measures: Aes-1.1 through Aes-1.11.

Facts in Support of Finding: The Project areas contain visual resources affording opportunities for scenic vistas. Although there are no formally designated scenic vistas, various areas within the County have identified Resource Conservation Areas that have aesthetic value. These are described in detail in section 2.1.1.2 of the General Plan FEIR. Visual access to these resources is available via public roads, parks, and trails. If future development or infrastructure is developed that is inconsistent with these vistas, it could detract from the scenic value and would cause a significant impact.

The Project incorporates goals and policies from the General Plan Land Use, Mobility, and Conservation and Open Space Elements to protect scenic vistas by requiring development to preserve or conserve scenic features of the County. The relevant policies are: LU-6.2, LU-6.3, LU-6.4, LU-6.6, LU-6.7, LU-6.9, LU-10.1, LU-10.2, M-2.3, COS-11.1, COS-11.2, COS-11.3, COS-11.4, COS-11.5, COS-11.6, COS-11.7; COS-12.1; COS-12.2. These policies direct development away from undeveloped areas with intact sensitive natural resources by designating these areas for very low-density or intensity land uses, support conservation-oriented project design when consistent the applicable community plan, require certain residential subdivisions to conserve open space and natural resources, require incorporation of natural features into proposed development, require contiguous open space areas, require new development to conform to the natural topography to limit grading and not significantly alter the dominant physical characteristics of a site, require new residential development to be integrated with existing neighborhoods, require the location and development of private roads to minimize visual impacts, and protect scenic highways. Adherence to these policies will reduce potential obstruction, interruption, or detraction of scenic vistas.

The land use maps have been developed to locate land uses of lower density or intensity on those lands that contribute to scenic vistas. In addition, the Project includes further mitigation measures that will reduce this potentially significant impact to a less than significant level as follows:

- Aes-1.1 will ensure that lands contributing to scenic vistas will not be developed with high density or high intensity uses. Therefore, visual impacts will be avoided or lessened. Visual resources will not be significantly affected by build-out of the Project.

- Aes-1.2 requires protections of sensitive biological habitats and species through the Biological Mitigation Ordinance, the Resource Protection Ordinance, Habitat Loss Permit Ordinance and the Multiple Species Conservation Program. By conserving natural resources, these regulations also preserve natural open space that contribute to the quality of many of the County's scenic vistas.

- Aes-1.3 will result in updates to Community Plans, which will further ensure that future development reflects the character and vision of each unincorporated community. Where scenic resources are a characteristic part of such communities, development proposals will need to avoid or minimize potential visual impacts.

- Aes-1.4 will result in an improved Design Review process for future development. This will allow a more current and consistent approach to a subjective issue, thereby ensuring that surrounding scenic resources are considered during the site design process to minimize potential impacts.

- Aes-1.5 is the preparation and implementation of a Conservation Subdivision Program, under which future subdivisions will be encouraged to use preserve design standards to conserve resources on site including visual scenic vistas and minimize impacts to natural resources. Such a program would guide preservation adjacent to other open space areas, avoiding impacts to sensitive areas, including scenic vistas. Thus, new development pursuant to the plan will be less likely to detract value from scenic resources, minimizing impacts to these resources.

- Aes-1.6 will require community review and specific compatibility findings for development projects that may have significant adverse effects on scenic resources. These measures will help ensure that project designs are compatible with the surrounding context, especially where scenic resources are in close proximity.

- Aes-1.7 will result in programs and regulations that preserve agricultural lands. Agricultural lands are often key components of scenic vistas and an integral part of community character. Therefore, preservation of these lands will help to minimize potential impacts to scenic resources.

- Aes-1.8 is direction to develop and improve regulations that protect the County's unique topography. This measure will minimize potential impacts to steep slopes and ridgelines that contribute to scenic landscapes in the unincorporated County because these regulations prohibit the disturbance of these resources.

- Aes-1.9 is the identification of scenic resources in the County through a cooperative effort among stakeholders. The data collected can then be used to evaluate future development projects within proximity to areas of specific scenic value and minimize or mitigate potential impacts.

- Aes-1.10 requires the County to participate in local and regional planning efforts with other agencies/entities. In so doing, the County will be able to better identify scenic resources within or near its land use jurisdiction. This effort will facilitate the protection of such resources because they will be identified and impacts to them can be avoided when processing development projects.

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- Aes-1.11 will continue the on-going efforts to require undergrounding of utilities for projects and to convert existing overhead utilities. This measure will reduce potential impacts to scenic vistas from overhead utility facilities throughout the County unincorporated area.

Cumulative Impact – Scenic Vistas: Cumulatively, projects located in the San Diego region would have the potential to result in a cumulative impact due to obstruction, interruption, or detraction from scenic vistas. In combination with other ongoing projects, the Project would have the potential to result in impacts that are cumulatively considerable. However, the General Plan Update policies and mitigation measures described above, in combination with the Resource Protection Ordinance and County Zoning Ordinance would mitigate cumulative impacts to scenic vistas to below a significant level.

A-2 **Significant Effect – Scenic Resources**: The FEIR identifies a potentially significant impact to scenic resources associated with the potential removal or substantial adverse change of features that contribute to the valued visual character or image of a neighborhood, community, State Scenic Highway, or localized area. This impact of the Project would be reduced to a less than significant level through implementation of identified General Plan policies and mitigation measures.

Mitigation Measures: Aes-1.1 through Aes-1.11

Facts in Support of Finding: The project areas contain many scenic resources including mountains, watersheds, scenic geologic features, and Resource Conservation Areas that have been identified for protection because of their scenic value. Scenic resources are often found in parks, habitat preserves, reservoirs, and other undeveloped lands throughout the County, but can also be found in urbanized areas. Future development would have the potential to result in the removal or alteration of scenic neighborhood or community resources. In addition, development along the two designated state scenic highways located in the County would have the potential to detract from the visual quality of the scenic highway.

The Project incorporates goals and policies from the General Plan Land Use, Mobility, and Conservation and Open Space Elements to protect scenic resources. The relevant policies are: LU-6.2, LU-6.3, LU-6.4, LU-6.6, LU-6.7, LU-6.9, LU-10.1, LU-10.2, M-2.3, COS-11.1, COS-11.2, COS-11.3, COS-11.4, COS-11.5, COS-11.6, COS-11.7; COS-12.1; COS-12.2. These policies direct development away from undeveloped areas with intact sensitive natural resources by designating these areas for very low-density or intensity land uses, support conservation-oriented project design when consistent the applicable community plan, require certain residential subdivisions to conserve open space and natural resources, require incorporation of natural features into proposed development, require contiguous open space areas, require new development to conform to the natural topography to limit grading and not significantly alter the dominant

physical characteristics of a site, require new residential development to be integrated with existing neighborhoods, require the location and development of private roads to minimize visual impacts, and protect scenic highways. Adherence to these policies will minimize potential removal or alteration of scenic resources.

The Project has been developed to locate land uses of less density or intensity on those lands that contribute to scenic resources. In addition, the Project includes further mitigation measures that will reduce this potentially significant impact as follows:

- Aes-1.1 will ensure that lands contributing to scenic vistas will not be developed with high density or high intensity uses. Therefore, visual impacts will be avoided or lessened. Visual resources will not be significantly affected by build-out of the Project.

- Aes-1.2 requires protections of sensitive biological habitats and through the Biological Mitigation Ordinance, the Resource Protection Ordinance, Habitat Loss Permit Ordinance, and the Multiple Species Conservation Program. By conserving natural resources, these regulations also preserve scenic resources.

- Aes-1.3 will result in updates to Community Plans, which will further ensure that future development reflects the character and vision of each unincorporated community. The updates will identify locations of scenic resources, and where scenic resources are a characteristic part of such communities, development proposals can be required to avoid or minimize potential visual impacts.

- Aes-1.4 will result in an improved Design Review process for future development. This will allow a more current and consistent approach to a subjective issue, thereby ensuring that surrounding scenic resources are considered during the site design process to minimize potential impacts.

- Aes-1.5 is the preparation and implementation of a Conservation Subdivision Program, under which future subdivisions will be encouraged to use preserve design standards to conserve resources on site including visual scenic vistas and minimize impacts to natural resources. Such a program would guide preservation adjacent to other open space areas, avoiding impacts to sensitive areas, including scenic vistas. Thus, new development pursuant to the plan will be less likely to detract value from scenic resources, minimizing impacts to these resources.

- Aes-1.6 will require community review and specific compatibility findings for development projects that may have significant adverse effects on scenic resources. These measures will help ensure that project designs are compatible with the surrounding context, especially where scenic resources are in close proximity.

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- Aes-1.7 will result in programs and regulations that preserve agricultural lands. Agricultural lands are often key components of scenic vistas and an integral part of community character. Therefore, preservation of these lands will help to minimize potential impacts to scenic resources.

- Aes-1.8 is direction to develop and improve regulations that protect the County's unique topography. This measure will minimize potential impacts to steep slopes and ridgelines that contribute to scenic landscapes in the unincorporated County because these regulations can prohibit the disturbance of these resources.

- Aes-1.9 is the identification of scenic resources in the County through a cooperative effort among stakeholders. The data collected can then be used to evaluate future development projects within proximity to areas of specific scenic value and minimize or mitigate potential impacts.

- Aes-1.10 requires the County to participate in local and regional planning efforts with other agencies/entities. In so doing, the County will be able to better identify scenic resources within or near its land use jurisdiction. This effort will facilitate the protection of such resources because local agencies will be able to consider scenic resources adjacent to their jurisdictions when planning development and infrastructure.

- Aes-1.11 will continue the on-going efforts to require undergrounding of utilities for projects and to convert existing overhead utilities. This measure will reduce potential impacts to scenic resources from overhead utility facilities throughout the County unincorporated area.

Cumulative Impact – Scenic Resources: Cumulatively, projects located in the San Diego region would have the potential to result in a cumulative impact to scenic resources due to removal or substantial adverse change of one or more features that contribute to the valued visual character or image of a neighborhood, community, State scenic highway, or localized area. In combination with other ongoing projects, the Project would have the potential to result in impacts that are cumulatively considerable. However, the General Plan policies and mitigation measures described above incorporated into the Project, in combination with the Resource Protection Ordinance and County Zoning Ordinance, would mitigate cumulative impacts to scenic vistas to below a significant level.

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A-3 **Significant Effect – Land Use Conflicts**: The FEIR identifies potentially significant impacts related to land use conflicts with Williamson Act contract lands or conflict with zoning for agricultural use. This impact of the Project would be reduced to a less than

significant level through implementation of identified General Plan policies and mitigation measures.

Mitigation Measures: Agr-2.1

Facts in Support of Finding: The Project area has a total of approximately 33,285 acres of Agricultural Preserves and approximately 21,598 acres of land under Williamson Act Contracts. As 2011 General Plan Implementation measure 5.3.1.E was implemented in the entire unincorporated area, including FCI lands, the "A" Special Area Designator would be removed from approximately 10,855 acres of non-contracted land within the Project area as a result of 2011 General Plan Implementation. Removal of non-contracted land from Agricultural Preserves and the associated "A" Zoning Designators on land adjacent to Williamson Act Contracts could allow incompatible development and result in the potential conversion of Williamson Act contracted lands. The "A" Designator would not be removed from lands currently under Williamson Act Contract. . Indirect impacts related to land use conflicts between agricultural lands and incompatible adjacent land uses would occur because removal of the "A" Designator within certain Project areas could allow development of new incompatible land uses adjacent to existing Williamson Act contracted lands, Agricultural Preserves, or agricultural operations. Development of land uses incompatible Williamson Act Contracts could result in potential indirect conversion of these lands. As a result, future development under the proposed Project would have the potential to result in potentially significant impacts related to agricultural zoning and/or lands under Williamson Act Contracts.

The Project incorporates goals and policies from the General Plan Land Use and Conservation and Open Space Elements that would reduce agricultural land use conflicts. The relevant policies are LU-7.1 and COS-6.3. These policies require lower density development designations, and siting of compatible recreational and open space uses in agricultural areas. Adherence to these policies will reduce potential land use conflicts with Williamson Act Contract lands because it will ensure that lands adjacent to Contract lands will either have low intensity development, or open space uses.

In addition, the Project includes a mitigation measure which will mitigate potentially significant impacts to a less than significant level as follows:

- Agr-2.1 requires that prior to approval of any Zoning Ordinance Amendment an impact analysis be completed for each land area proposed to be removed from Agricultural Preserve. The analysis will determine whether or not the action will have indirect effects on Williamson Act Contract lands and the Agricultural Preserve disestablishment. If potential impacts are identified, then removal of the preserve status (*i.e.,* the Zoning Ordinance Amendment) will not take place. This will ensure that potential land use conflicts with Williamson Act Contract lands are avoided.

Cumulative Impact – Land Use Conflicts: Within the Project area, cumulative projects would not result in conflicts with existing agricultural zoning or Williamson Act Contracts since regulations are in place to prevent such conflicts. Implementation of these regulations would reduce the potential for cumulative projects resulting in conflicts with adjacent lands that are zoned for agricultural use or Williamson Act Contracts. As a result, a potentially significant cumulative impact would not occur from the combined impacts of other cumulative projects. Therefore, the Project would not contribute to a potentially significant cumulative impact.

BIOLOGICAL RESOURCES

A-4 **Significant Effect – Federally Protected Wetlands**: The FEIR identifies potentially significant impacts to federally protected wetlands as defined by Section 404 of the Clean Water Act. This impact of the Project would be reduced to a less than significant level through implementation of identified General Plan policies and mitigation measures.

Mitigation Measures: Bio-1.1, Bio-1.5, Bio-1.6, Bio-1.7, Bio-2.2, Bio-2.3, and Bio-2.4.

Facts in Support of Finding: Impacts to federally protected wetlands would occur if removal, filling, hydrological interruption, or other disturbances of wetlands would result from ground disturbing activities (such as grading and excavation) in previously undeveloped lands. The Project area includes approximately 2,090 acres of wetlands with the majority of the wetland acreage located in Central Mountain, North Mountain, and Alpine Project areas. Consistent with the approach taken in the General Plan Update PEIR, this acreage is conservative in that it is inclusive of, but not limited to federally protected wetlands.

The Project includes policies from the General Plan Conservation and Open Space Element which would reduce the potential for adverse impacts to federally protected wetlands. The relevant policies are: COS-3.1 and COS-3.2. Adherence to these policies will reduce direct impacts to federally protected wetlands from future development because they require new development to protect and avoid wetland areas and where impacts do occur they require a no-net loss of wetland habitats.

In addition, the Project includes mitigation measures which will mitigate potentially significant impacts to a less than significant level as follows:

- Bio-1.1 requires the preparation and implementation of a Conservation Subdivision Program, under which future subdivisions will use preserve design standards to conserve sensitive habitat on site and minimize impacts to natural resources. This program will prevent direct impacts to federally protected wetlands located on subdivision sites.

- Bio-1.5 requires the use of GIS and other tools to identify sensitive resources, such as wetlands, on Project sites at time of project processing. It also requires application of the County Guidelines for Determining Significance for Biological Resources during project review to avoid or mitigate potential impacts to sensitive biological resources, including federally protected wetlands.

- Bio-1.6 requires application of County ordinances to projects for the purpose of protecting important biological resources. This includes the Resource Protection Ordinance, the Biological Mitigation Ordinance, and the Habitat Loss Permit Ordinance. Sensitive resources protected under these regulations include wetlands, wetland buffers, sensitive habitat lands, biological resource core areas, linkages, corridors, high-value habitat areas, subregional coastal sage scrub focus areas, and populations of rare, or endangered plant or animal species. Under these regulations, impacts to federally protected wetlands are either avoided or mitigated to the standard of no-net-loss to wetlands.

- Bio-1.7 requires application of other County ordinances that minimize indirect effects to biological resources. Such regulations include the Noise Ordinance, the Groundwater Ordinance, Landscaping Regulations (currently part of the Zoning Ordinance), and the County Watershed Protection, Storm Water Management, and Discharge Control Ordinance. As these regulations are applied to projects, potential impacts to federally protected wetlands are further minimized or avoided.

- Bio-2.2 requires that development projects obtain CWA Section 401/404 permits issued by the California Regional Water Quality Control Board and U.S. Army Corps of Engineers for all project-related disturbances of waters of the U.S. and/or associated wetlands. It further requires that projects obtain Fish and Game Code Section 1602 Streambed Alteration Agreements from the California Department of Fish and Game for all project-related disturbances of streambeds. These permitting processes require that impacts are avoided or mitigated to the satisfaction of the state and federal agencies.

- Bio-2.3 requires that wetlands and wetland buffer areas be adequately preserved whenever feasible to maintain biological functions and values. This standard shall be applied to private and public projects and to minimize potential impacts to federally protected wetlands.

- Bio-2.4 requires implementation of the Watershed Protection, Storm Water Management, and Discharge Control Ordinance to protect wetlands. By reducing polluted runoff and improving the water quality of receiving waters, this ordinance shall further minimize potential impacts to federally protected wetlands.

Cumulative Impact – Federally Protected Wetlands: Cumulatively, projects located in the San Diego region would have the potential to result in a cumulative impact to

federally protected wetlands. However, individual projects will be required to mitigate their impacts to the extent feasible to meet the no-net-loss standard. Existing regulations and policies noted above would ensure that a significant cumulative impact associated with federally protected wetlands would not occur. Therefore, the Project would not contribute to a significant cumulative impact.

CULTURAL RESOURCES

A-5 **Significant Effect – Historical Resources**: The FEIR identifies potentially significant impacts to historical resources as defined in Section 15064.5 of the state CEQA Guidelines or the County's Resource Protection Ordinance. This impact of the Project would be reduced to a less than significant level through implementation of identified General Plan policies and mitigation measures.

Mitigation Measures: Cul-1.1 through Cul-1.8

Facts in Support of Finding: Impacts to historical resources would occur if development resulted in physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired. Both direct and indirect impacts to historical resources may result from development under the Project.

The Project includes a policy from the General Plan Conservation and Open Space Element which would reduce the potential for adverse impacts to historical resources. The relevant policy is COS-8.1. This policy encourages the preservation and/or appropriate adaptive re-use of historic structures and the preservation of historical landscaping as a means of protecting important historical resources while respecting the heritage, context, design, and scale of older structures and neighborhoods. Adherence to this policy will reduce direct impacts to historical resources from future development because the preservation or adaptive reuse of historic sites, structures, and landscapes will be encouraged.

In addition, the Project includes mitigation measures which will mitigate potentially significant impacts to below a level of significance as follows:

- Cul-1.1 is the utilization of regulations such as the Resource Protection Ordinance, CEQA Guidelines, the Grading and Clearing Ordinance, and the Zoning Ordinance to identify and protect important historic and archaeological resources. This will be accomplished by requiring appropriate reviews to identify historic resources and requiring avoidance or mitigation to when impacts are significant.

- Cul-1.2 requires the County to provide incentives through the Mills Act to encourage the restoration, renovation, or adaptive reuse of historic resources. This will minimize potential direct and indirect impacts to historical resources since property

owners will be encouraged to maintain those resources, and will obtain tax benefits from doing so.

- Cul-1.3 will result in a new effort to identify and catalog historic and potentially historic resources within unincorporated San Diego County. This will ensure that landowners are better informed of potential resources on their properties as well as the options available to them under the State/National Register or the Mills Act. In some cases, properties may be zoned with a special area designator for historic resources, thereby restricting demolition/removal and requiring a Site Plan permit for proposed construction which will be reviewed by the Historic Site Board. This measure will ameliorate on-going impacts as well as potential impacts that may result from development under the Project.

- Cul-1.4 requires the County to support the Historic Site Board in their efforts to provide oversight for historic resources. This Board is an advisory body that provides recommendations to decision makers regarding archaeological and historic cultural resources. The Historic Site Board is responsible for reviewing resources seeking historic designation and participation in the Mills Act as well as discretionary projects with significant cultural resources. This coordination will increase awareness of existing resources and minimize potential direct or indirect effects from development or environmental changes.

- Cul-1.5 requires landmarking and historical listing of County owned historic sites. In so doing, the County can increase public awareness and prevent potential impacts that would otherwise result from development permits.

- Cul-1.6 is the implementation, and update as necessary, of the County's Guidelines for Determining Significance for Cultural Resources. These guidelines apply to all discretionary actions and require identification and minimization of adverse impacts to historic and archaeological resources.

- Cul-1.7 requires the County to identify potentially historic structures within the County through the use of surveys, input from the Historic Site Board, information from the Save Our Heritage Organization as well as from planning groups and other jurisdictions. Once identified, the County will keep these records in the property database and monitor their status with updates every five years. This information will be used to help avoid potential impacts as described in Cul-1.6 above.

- Cul-1.8 is the revision of the Resource Protection Ordinance to apply to the demolition or alteration of identified significant historic structures.

Cumulative Impact – Historical Resources: Cumulatively, projects located in the southern California region would have the potential to result in a cumulative impact associated with the loss of historical resources through the physical demolition,

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destruction, relocation, or alteration of a resource or its immediate surroundings such that the significance of a historical resource would be materially impaired. Past projects involving development and construction have already impacted historical resources within the region. Additionally, the Project would result in a potentially significant cumulative impact prior to mitigation. However, the policies and mitigation measures identified above would mitigate potentially significant cumulative impacts identified for the Project to a less than significant level. All projects within the unincorporated County are required to be consistent with local and state regulations regarding the protection, preservation and rehabilitation of historical resources, including projects within and outside of the FCI project areas.

A-6 **Significant Effect – Archaeological Resources**: The FEIR identifies potentially significant impacts to archaeological resources from potential ground-disturbing activities associated with future development and indirect impacts resulting from land development activities. This impact of the Project would be reduced to a less than significant level through implementation of identified General Plan policies and mitigation measures.

Mitigation Measures: Cul-1.1, Cul-1.6, and Cul-2.1 through 2.6

Facts in Support of Finding: Impacts to archaeological resources would occur if development resulted in a substantial adverse change in the significance of an archaeological resource as defined by Public Resources Code Section 21083.2 and State CEQA Guidelines Section 15064.5(a). Indirect impacts may also occur from land use development activities that increase erosion, fugitive dust, or the accessibility of a surface or subsurface resource.

The Project includes policies from the General Plan Conservation and Open Space Element which would reduce the potential for adverse impacts to archaeological resources. The relevant policies are: COS-7.1, COS-7.2, COS-7.3, and COS-7.4. These policies describe how archaeological resources should be protected, require new development to include appropriate mitigation to protect the quality and integrity of important archaeological resources, promote avoidance of archaeological resources and protection of them in open space easements whenever possible, require appropriate treatment and preservation of collected archaeological resources, and require consultation with local Native American tribes concerning the preservation and treatment of tribal archaeological resources and support of appropriate signage. Adherence to these policies will reduce direct impacts to archaeological resources from future development.

In addition, the Project includes mitigation measures which will mitigate potentially significant direct and indirect impacts to a less than significant level as follows:

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- Cul-1.1 is the utilization of regulations such as the Resource Protection Ordinance, CEQA Guidelines, the Grading and Clearing Ordinance, and the Zoning Ordinance to identify and protect important historic and archaeological resources. This will be accomplished by requiring appropriate reviews to identify historic resources and requiring avoidance or mitigation to resources when impacts are significant.

- Cul-1.6 is the implementation, and update as necessary, of the County's Guidelines for Determining Significance for Cultural Resources. These guidelines apply to all discretionary actions and require identification and minimization of adverse impacts to historic and archaeological resources.

- Cul-2.1 requires that the County develop management and restoration plans for identified and acquired properties with archaeological resources. Such plans will prevent or ameliorate adverse changes in the significance of known archaeological resources.

- Cul-2.2 is the identification and acquisition of important resources through collaboration with agencies, tribes, and institutions, such as the South Coast Information Center (SCIC), while maintaining the confidentiality of sensitive cultural information. Such acquisitions would preserve resources in their existing sites while preventing disclosure of the locations to the general public.

- Cul-2.3 requires County support of dedication of easements that protect important cultural resources through a variety of funding methods, such as grants or matching funds, or funds from private organizations. Such easements preserve cultural resources in their existing site locations and thus, help to minimize potential direct or indirect impacts.

- Cul-2.4 is the on-going regional coordination and consultation with the NAHC and local tribal governments, including SB-18 review. These cooperative efforts ensure that significant sites are identified and preserved to the satisfaction of all parties.

- Cul-2.5 requires grading monitoring by a qualified archaeologist and a Native American monitor during ground disturbing activities in the vicinity of known archaeological resources and during initial surveys. The use of monitors prevents direct impacts to archaeological resources.

- Cul-2.6 requires identification and acquisition of important resources through regional coordination with agencies and institutions such as the South Coast Information Center (SCIC). It further requires consultation with the Native American Heritage Commission (NAHC) and local tribal governments, including SB-18 review. These steps would ensure that identified archaeological resources are protected in place.

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Cumulative Impact – Archaeological Resources: Cumulatively, projects located in the southern California region would have the potential to result in a cumulative impact associated with the loss of archaeological resources through development activities that could cause a substantial adverse change in the significance of an archaeological resource. Past projects involving development and construction have already impacted archaeological resources within the region. Additionally, the Project would result in a potentially significant cumulative impact prior to mitigation. However, the General Plan policies and mitigation measures identified above would mitigate the Project's potentially significant direct and cumulative impacts related to archaeological resources to a less than significant level. The overall cumulative effects will also be reduced by the implementation of General Plan policies and mitigation measures which are applied to all projects within the unincorporated County, inside and outside of the FCI Lands project areas.

A-7 **Significant Effect – Paleontological Resources**: The FEIR identifies potentially significant impacts to paleontological resources from future development activities. This impact of the Project would be reduced to a less than significant level through implementation of identified General Plan policies and mitigation measures.

Mitigation Measures: Cul-3.1 and Cul-3.2

Facts in Support of Finding: Paleontological resources are found in sedimentary strata of the County, which primarily underlies the coastal plain, the desert and some mountain valleys. Impacts to paleontological resources would occur if development activities directly or indirectly destroy a unique paleontological resource or site. Such impacts usually result from the physical destruction of fossil remains by excavation operations that cut into geologic formations.

The Project includes one goal and policy from the General Plan Conservation and Open Space Element that would protect paleontological resources. The relevant goal is COS-9 and the relevant policy is COS-9.1, which requires the salvage and preservation of unique paleontological resources when exposed to the elements during excavation, grading activities, or other development practices. Adherence to this policy will reduce direct impacts to paleontological resources from future development.

In addition, the Project includes mitigation measures which will mitigate potentially significant impacts to a less than significant level as follows:

- Cul-3.1 implements the County Grading Ordinance and CEQA guidelines which require a paleontological resources monitor during grading when appropriate, to avoid or minimize impacts to resources, and to apply appropriate mitigation when impacts are significant (*e.g.,* salvage, curation, data collection, etc.). These measures would prevent significant losses of unique paleontological resources.

- Cul-3.2 requires the County to implement, and update as necessary, the County's Guidelines for Determining Significance for Paleontological Resources to identify and minimize adverse impacts to paleontological resources. These guidelines apply to discretionary actions and development projects under the Project and result in identification of resources and avoid or mitigate significant impacts.

Cumulative Impact – Paleontological Resources: Cumulatively, projects located in the southern California region would have the potential to result in a cumulative impact associated with paleontological resources from extensive grading, excavation or other ground-disturbing activities. Additionally, the Project would result in a potentially significant cumulative impact prior to mitigation. However, the proposed General Plan Update policy and mitigation measure identified in Section 2.5.6.3 would mitigate project's potentially significant direct and cumulative impacts related to paleontological resources to a less than significant level.

A-8 **Significant Effect – Human Remains**: The FEIR identifies potentially significant impacts to human remains from future development activities. This impact of the Project would be reduced to a less than significant level through implementation of identified General Plan policies and mitigation measures.

Mitigation Measures: Cul-1.1, Cul-1.6, and Cul-4.1

Facts in Support of Finding: Archaeological investigations within the unincorporated County have identified human remains from prior human occupations, which are important cultural resources. The disturbance of human remains, Native American or otherwise, including those interred outside of formal cemeteries, is considered a significant impact.

Ground disturbing impacts, including grading, excavation, and utilities installation during construction, would have the potential to cause adverse impacts to currently undiscovered human remains. The potential for disturbance may be reduced through surveying a site to determine the likelihood that human remains are present, review of archaeological records to determine if human remains are known to occur in the area, and then designing future development to avoid areas where burials may be present.

The Project includes one policy from the General Plan Conservation and Open Space Element that addresses human remains. The relevant policy is COS-7.5. Adherence to this policy will reduce direct impacts to human remains from future development because it requires that where human remains are encountered, they be treated in a dignified manner.

In addition, the Project includes mitigation measures which will mitigate potentially significant impacts to a less than significant level as follows:

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- Cul-1.1 is the utilization of regulations such as the Resource Protection Ordinance, CEQA Guidelines, the Grading and Clearing Ordinance, and the Zoning Ordinance to identify and protect important historic and archaeological resources. This will be accomplished by requiring appropriate reviews to identify historic resources and requiring avoidance or mitigation to when impacts are significant.

- Cul-1.6 is the implementation, and modification as necessary, of the County's Guidelines for Determining Significance for Cultural Resources. These guidelines are used in conjunction with permitting processes to identify and minimize adverse impacts to historic and archaeological resources, including human remains.

- Cul-4.1 requires that all land disturbance and archaeological-related programs include regulations and procedures that address what to do if human remains are discovered. These procedures will promote preservation and include proper handling and mitigating actions. They will also require coordination with applicable Native American groups.

Cumulative Impact – Human Remains: Cumulative projects located in the southern California region would have the potential to result in impacts associated with human remains due to grading, excavation or other ground-disturbing activities. Additionally, the Project would result in a potentially significant cumulative impact prior to mitigation. However, the proposed General Plan Update policy and mitigation measure identified above would mitigate potentially significant direct and cumulative impacts related to human remains to a less than significant level. All projects within the unincorporated County are required to be consistent with local and state regulations regarding the protection of human remains, including projects within and outside of the FCI Lands GPA project areas.

HAZARDS AND HAZARDOUS MATERIALS

A-9 **Significant Effect – Private Airports**: The FEIR identifies potentially significant safety hazard impacts associated with development near private airports. This impact of the Project would be reduced to a less than significant level through implementation of identified General Plan policies and mitigation measures.

Mitigation Measures: Haz-1.1 through Haz-1.5, Haz-2.1

Facts in Support of Finding: Within the unincorporated County, four private airports in the communities of Alpine (U.S. Forest Service), and North Mountain (Ward Ranch, Warner Springs, and Loma Madera Ranch) would be affected by the Project. Caltrans' Division of Aeronautics controls private and special-use airports through a permitting process, and is also responsible for regulating operational activities at these airports.

The Project includes policies from the General Plan Land Use Element, Safety Element and Mobility Element that would reduce safety hazards associated with private airports. The relevant policies are LU-4.7, M-7.1, S-15.1, S-15.2, S-15.3, and S-15.4. These policies require coordination with the Airport Land Use Commission (ALUC) and support review of Airport Land Use Compatibility Plans for development within Airport Influence Areas, require that airport facilities be operated and improved to meet transportation in a manner consistent with the ALUP, require land uses surrounding airports to be compatible with the operation of each airport, require operational plans for new public/private airports and heliports to be compatible with existing and planned land uses that surround the airport facility, restrict potentially hazardous obstructions or other hazards to flight located within airport approach and departure areas, and discourage uses that may impact airport operations or do not meet federal or State aviation standards. In addition, Policy S-15.4 would locate private airstrips and heliports outside of safety zones and flight paths for existing airports and in a manner to avoid impacting public roadways and facilities compatible with surrounding established and planned land uses. Adherence to these policies will reduce safety hazard impacts associated with private airports.

In addition, the Project includes mitigation measures which will mitigate potentially significant impacts to a less than significant level as follows:

- Haz-1.1 requires the County to apply the Guidelines for Determining Significance, Airport Hazards, when reviewing new development projects to ensure compatibility with surrounding airports and land uses. It also requires application of appropriate mitigation, such as design/construction standards and avigation easements, when impacts are significant. Potential safety hazards associated with development near private airports can be avoided by following these guidelines because it will ensure that development projects are compatible with surrounding private airports.

- Haz-1.2 is the participation in the development of ALUCPs and future revisions to the ALUCPs to ensure the compatibility of land uses and airport operations. By working closely with the San Diego County Regional Airport Authority (SDCRAA), potential land use conflicts and safety hazards can be prevented by locating new airport facilities in areas that avoid conflicts with development. .

- Haz-1.3 requires that the Air Installation Compatible Use Zone (AICUZ) Program be considered when reviewing new development within the influence area. Such development projects must be consistent with the land use compatibility and safety policies within the AICUZ in order to minimize potential safety hazards.

- Haz-1.4 entails close coordination between DPW and DPLU staff when planning new airports or operational changes to existing airports when those changes would produce new or modified airport hazard zones. This will help to minimize land use compatibility issues, and thereby identify and prevent potential safety hazards.

- Haz-1.5 requires close coordination with the SDCRAA and County Airports for issues related to airport planning and operations. This will further help to minimize land use compatibility issues, and will ensure that the County identifies and avoids potential safety hazards.

- Haz-2.1 is the implementation of the Zoning Ordinance, which requires Major Use Permits for private airports and heliports. The Major Use Permit findings and requirements will help to minimize potential land use compatibility conflicts and safety hazard issues for development near private airports. Projects that cannot be found to be compatible would be denied.

Cumulative Impact – Private Airports: Cumulative projects, such as general plans in surrounding jurisdictions or developments on tribal lands or within Mexico, would potentially result in incompatible land uses within the vicinity of a private airport. This could potentially result in a significant safety hazard for people residing or working in these Project areas. However, cumulative private airport projects would each be subject to safety regulations, such as FAA standards, DOD standards and the State Aeronautics Act, which would reduce the potential for safety hazards to below a level of significance. As such, these projects would not result in a potentially significant cumulative impact. Therefore, the proposed General Plan Update would not contribute to a potentially significant cumulative impact.

A-10 **Significant Effect – Emergency Response and Evacuation Plans**: The FEIR identifies potential significant impacts from future development associated with adopted emergency response plans or emergency evacuation plans that may not have accounted for the growth. This impact of the Project would be reduced to a less than significant level through implementation of identified General Plan policies and mitigation measures.

Mitigation Measures: Haz-3.1 through Haz-3.3

Facts in Support of Finding: The proposed Project would increase development in areas that may not have accounted for this growth in their existing Emergency Response and Evacuation plans. For example, construction activities associated with future development under the proposed Project would have the potential to interfere with emergency plans and procedures if authorities are not properly notified, or multiple projects are constructed during the same time and multiple roadways used for emergency routes are concurrently blocked. This could cause an inadvertent impairment to the existing emergency response plans and policies, which could increase the risk to loss of life and property in the event of an emergency; however, these potentially significant direct impacts resulting from implementation of the proposed Project would be reduced to below a level of significance by the same regulations, implementation

programs (2011 General Plan goals/policies) and mitigation measures from the General Plan Update PEIR below.

The Project includes policies from the General Plan Safety Element and Mobility Element that address potential interference with adopted emergency response and evacuation plans. The relevant policies are S-1.3, M-1.2, M-3.3, M-4.3. These policies support efforts and programs that address reducing the risk of natural and man-made hazards and the appropriate disaster response, provide for an interconnected public road network with multiple connections that improve efficiency, provide both primary and secondary access/egress routes that support emergency services during fire and other emergencies, require new development to provide multiple access/egress routes, and require public and private roads to allow for necessary access for fire apparatus and emergency vehicles accommodating outgoing vehicles from evacuating residents. Adherence to these policies will reduce direct impacts to emergency response and evacuation plans from future development.

In addition, the Project includes mitigation measures which will mitigate potentially significant impacts to a less than significant level as follows:

- Haz-3.1 requires coordination between DPLU and the Office of Emergency services to implement and periodically update the Hazard Mitigation Plan. This will ensure planning staff can identify standards that affect future development while OES staff will be able to detect and prevent impediments to emergency response and evacuation plans.

- Haz-3.2 requires the County to implement the Guidelines for Determining Significance, Emergency Response Plans, to ensure that discretionary projects do not adversely impact emergency response or evacuation plans. It also requires the County to apply Public and Private Road Standards to projects. These steps will avoid potential conflicts with adopted emergency response and evacuation plans.

- Haz-3.3 is the preparation of Fire Access Road network plans and incorporation into Community Plans or other documents as appropriate. It also requires the County to implement the Consolidated Fire Code and to require fire apparatus access roads and secondary access in development projects. These measures will ensure that projects are consistent with adopted emergency and evacuation plans.

Cumulative Impact – Emergency Response and Evacuation Plans: Cumulative projects, such as development consistent with surrounding jurisdictions general plans, energy projects, or private projects, would have the potential to impair existing emergency and evacuation plans. This could occur from any of the following: 1) an increase in population that is induced from cumulative projects which are unaccounted for in emergency plans; 2) an increase in population that emergency response teams are unable to service adequately in the event of a disaster; or 3) evacuation route

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impairment if multiple development projects concurrently block multiple evacuation or access roads. However, cumulative projects would be required to comply with applicable emergency response and evacuation policies outlined in regulations such as the Federal Response Plan, the California Emergency Services Act, and local fire codes. As such, cumulative projects would not result in a significant cumulative impact. Therefore, the proposed General Plan Update, in combination with other cumulative projects, would not contribute to a significant cumulative impact.

HYDROLOGY AND WATER QUALITY

A-11 **Significant Effect – Erosion or Siltation**: The FEIR identifies potentially significant impacts associated with alteration of drainage patterns that would result in substantial erosion or siltation. This impact of the Project would be reduced to a less than significant level through implementation of identified General Plan policies and mitigation measures.

Mitigation Measures: Hyd-1.2, Hyd-1.3, Hyd-1.5, Hyd-3.1, Hyd-3.2, and Hyd-3.3.

Facts in Support of Finding: Construction activities, such as the grading and excavation of land for construction of new building foundations, roads, driveways, and trenches for utilities, and impervious surface areas that will result from implementation of the Project can alter drainage patterns, either temporarily or permanently. As such, the magnitude and frequency of stream flows can be affected, thereby increasing deposition of pollutants and sediment in County watersheds.

The Project includes policies from the General Plan Land Use Element and the Conservation and Open Space Element that address potential erosion or siltation associated with alteration of drainage patterns. The relevant policies are LU-6.5, LU-6.9, and COS-5.3. These policies ensure that development minimize the use of impervious surfaces, use Low Impact Development techniques, incorporate best management practices, require new development to conform to the natural topography of the site to utilize natural drainage and topography in conveying stormwater, ensure the protection and maintenance of local watersheds, and require new development to protect downslope areas from erosion. Adherence to these policies will reduce erosion/siltation impacts from future development.

In addition, the Project includes mitigation measures which will mitigate potentially significant impacts to a less than significant level as follows:

- Hyd-1.2 requires the County to implement and revise as necessary the Watershed Protection Ordinance. This Ordinance requires projects to reduce polluted runoff, encourages the removal of invasive species in natural drainages, and help to restore drainage systems to their natural composition and flow rates, thus lowering the amount of erosion and siltation in watersheds.

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- Hyd-1.3 requires preparation and implementation of LID standards for new development. These standards minimize runoff and maximize infiltration.

- Hyd-1.5 is the utilization of County Guidelines for Determining Significance for Surface Water Quality, Hydrology, and Groundwater Resources to identify adverse environmental effects. If such impacts are identified, appropriate mitigation measures are then included in the action.

- Hyd-3.1 requires the County to implement, and revise as necessary, ordinances that require new development to be located down and away from ridgelines, conform to the natural topography, not significantly alter dominant physical characteristics of the site, and maximize natural drainage and topography when conveying stormwater. As these restrictions are applied to new projects, drainage patterns will not be adversely affected in ways that lead to erosion and siltation.

- Hyd-3.2 requires the County to implement and revise as necessary the Resource Protection Ordinance to limit development on steep slopes. It also incorporates the Hillside Development Policy into the Resource Protection Ordinance to the extent that it will allow for one comprehensive approach to steep-slope protections. By minimizing development on steep slopes, erosion and siltation impacts will be avoided.

- Hyd-3.3 is the implementation the Grading, Clearing and Watercourses Ordinance to protect development sites against erosion and instability. This ordinance includes many requirements to avoid erosion and siltation, such as: removal of loose dirt; installation of erosion control or drainage devices; inclusion and maintenance of sedimentation basins; planting requirements; slope stabilization measures; provision of drainage calculations; proper irrigation systems; etc.

Cumulative Impact – Erosion or Siltation: Cumulative projects identified in this analysis would result in multiple developments that would potentially alter existing drainage patterns in a manner that would result in substantial erosion or siltation. It is reasonably foreseeable that some cumulative projects would occur simultaneously, which would compound the impacts of erosion and siltation and therefore create a significant cumulative impact. Additionally, the Project would result in a potentially significant cumulative impact associated with erosion or siltation. However, implementation of the General Plan policies and mitigation measures, in addition to compliance with applicable regulations, would mitigate the project's direct and cumulative impacts to below a level of significance. All projects within the unincorporated County are required to be consistent with local and state regulations to avoid and minimize erosion and siltation, including projects within and outside of the FCI project areas.

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A-12 **Significant Effect – Flooding**: The FEIR identifies potentially significant impacts to drainage patterns from future development activities that could result in flooding. This impact of the Project would be reduced to a less than significant level through implementation of identified General Plan policies and mitigation measures.

Mitigation Measures: Hyd-1.1 through Hyd-1.5, Hyd-2.5, and Hyd-4.1 through Hyd-4.3

Facts in Support of Finding: Construction activities and development that will result from implementation of the Project can alter drainage patterns, either temporarily or permanently. Such alterations could substantially increase the rate and amount of surface runoff to streams and rivers in a manner which would result in flooding.

The Project includes policies from the General Plan Land Use Element and Safety Element that address impacts associated with flooding. The relevant policies are LU-6.5, LU-6.10, S-9.2, S-10.2, S-10.3, S-10.4, S-10.6. These policies ensure that development minimizes the use of impervious surfaces, apply Low Impact Development techniques and best management practices, require new development to be located and designed to protect property and residents from hazard risks, require minimization of new development in floodplains require the use of natural channels for County flood control facilities, require flood control facilities to be adequately sized and maintained to operate effectively, require new development to incorporate measures to minimize storm water impacts, and ensure new development maintains the existing area's hydrology. Adherence to these policies will reduce flooding impacts from future development.

In addition, the Project includes mitigation measures which will mitigate potentially significant impacts to a less than significant level as follows:

- Hyd-1.1 requires the County to update and implement the County of San Diego's Jurisdictional Urban Runoff Management Program (JURMP). This program addresses discharge volumes as well as pollutants to help minimize flooding problems.

- Hyd-1.2 requires the County to implement and revise as necessary the Watershed Protection Ordinance. This will reduce polluted runoff, encourage the removal of invasive species in natural drainages, and help to restore drainage systems to their natural composition and flow rates.

- Hyd-1.3 requires preparation and implementation of LID standards for new development. These standards minimize runoff and maximize infiltration, thereby avoiding potential flooding issues.

- Hyd-1.4 requires that the County revise and implement the Stormwater Standards Manual. This document recommends best management practices for land use with

a high potential to contaminate surface water or groundwater resources. This will help reduce flooding as well as improve water quality.

- Hyd-1.5 is the utilization of County Guidelines for Determining Significance for Surface Water Quality, Hydrology, and Groundwater Resources to identify adverse environmental effects. If such impacts are identified, appropriate mitigation measures are then included in the action to avoid alteration of existing drainage patterns and/or to alleviate potential flooding on or near Project sites.

- Hyd-2.5 requires the County to implement and revise as necessary the Resource Protection Ordinance and Policy I-68 Proposed Projects in Flood Plains / Floodways to restrict development in flood plains / floodways. This will help prevent potential flooding issues from development activities that would otherwise alter existing drainage patterns.

- Hyd-4.1 requires the County to implement the Flood Damage Prevention Ordinance (Regulatory Code 91.1.105.10) to reduce flood losses in specified areas. This ordinance regulates development within all areas of special flood hazards and areas of flood-related erosion hazards, and establishes policies that minimize public and private losses due to flood conditions.

- Hyd-4.2 requires the County to implement the Grading, Clearing and Watercourses Ordinance to limit activities affecting watercourses. This will minimize any alteration of drainage patterns and prevent flooding associated with development projects.

- Hyd-4.3 requires the County to update and implement the following Board Policies: Policy I-68, which establishes procedures for projects that impact floodways; Policy I-45, which defines watercourses that are subject to flood control; and Policy I-56, which permits, and establishes criteria for, staged construction of off-site flood control and drainage facilities by the private sector when there is a demonstrated and substantial public, private or environmental benefit. These policies further minimize potential impacts from flooding by regulating activities in flood-prone areas.

Cumulative Impact – Flooding: Cumulative projects would result in land uses and development that would convert permeable surfaces to impermeable surfaces, such as through the construction of buildings, parking lots, and roadways. New development proposed under cumulative projects would have the potential to alter existing drainage patterns, increase the amount of runoff and potentially increase flooding in the San Diego region. Additionally, the Project would result in a potentially significant cumulative impact associated with flooding. However, implementation of the General Plan policies and mitigation measures, in addition to compliance with applicable regulations, would mitigate the Project's direct and cumulative impacts to below a level of significance. All projects within the unincorporated County are required to be consistent with local and

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state regulations regarding the protection of people and structures from the impacts of flooding, including projects within and outside of the FCI project areas.

A-13 **Significant Effect – Capacity of Stormwater Systems**: The FEIR identifies potentially significant impacts to stormwater systems and impacts from additional sources of polluted runoff from future development activities. This impact of the Project would be reduced to a less than significant level through implementation of identified General Plan policies and mitigation measures.

Mitigation Measures: Hyd-1.1, Hyd-1.2, Hyd-1.3, Hyd-1.4, Hyd-1.5, Hyd-2.5, Hyd-3.1, Hyd-4.1, Hyd-4.2, and Hyd-4.3

Facts in Support of Finding: Drainage facilities are designed to prevent flooding by collecting stormwater runoff and directing flows to natural drainage courses and/or away from urban development. If the capacity of existing facilities is exceeded, flooding can occur. The Project will result in construction activities and impervious surfaces that can alter drainage patterns and lead to an excess of stormwater runoff. Generation of substantial runoff volumes would have the potential to overload existing drainage facilities and/or provide additional sources of polluted runoff.

The Project includes policies from the General Plan Land Use Element, Conservation and Open Space Element, and Safety Element that address impacts to stormwater system capacity. The relevant policies are LU-6.5, LU-6.9, COS-4.3, COS-5.2, S-9.2, and S-10.2 through S-10.6. These policies ensure that development minimizes the use of impervious surfaces, apply Low Impact Development techniques and best management practices, require new development to utilize natural drainage and topography in conveying stormwater, require development to maximize stormwater filtration and the natural drainage patterns, require new development to minimize the use of directly connected impervious surfaces, require minimization of new development in floodplains, require the use of natural channels for County flood control facilities, require flood control facilities to be adequately sized and maintained to operate effectively, require new development to minimize storm water impacts, require new development to provide necessary on-site and off-site improvements to storm water runoff and drainage facilities, and ensure that new development maintains the existing area's hydrology. Adherence to these policies will reduce direct impacts to stormwater systems from future development.

In addition, the Project includes mitigation measures which will mitigate potentially significant impacts to a less than significant level as follows:

- Hyd-1.1 requires the County to update and implement the County of San Diego's Jurisdictional Urban Runoff Management Program (JURMP). This program addresses discharge volumes as well as pollutants to help minimize impacts to stormwater systems and avoid flooding problems.

- Hyd-1.2 requires the County to implement and revise as necessary the Watershed Protection Ordinance. This will reduce polluted runoff and help to restore drainage systems to their natural composition and flow rates. As such, the capacity of stormwater drainage systems will not be exceeded.

- Hyd-1.3 requires preparation and implementation of LID standards for new development. These standards minimize runoff and maximize infiltration, which will further alleviate impacts on stormwater drainage facilities.

- Hyd-1.4 is the revision and implementation of the Stormwater Standards Manual, a guidance document for land use activities with a high potential to contaminate surface water or groundwater resources. Application of the measures and practices within the manual will alleviate burdens on existing stormwater systems and minimize sources of polluted runoff.

- Hyd-1.5 is the utilization of County Guidelines for Determining Significance for Surface Water Quality, Hydrology, and Groundwater Resources to identify adverse environmental effects. If such impacts are identified, appropriate mitigation measures are then included in the action to reduce runoff volumes and improve water quality.

- Hyd-2.5 requires the County to implement and revise as necessary the Resource Protection Ordinance and Policy I-68: Proposed Projects in Flood Plains / Floodways, to restrict development in flood plains / floodways. This will help prevent potential flooding or increased flow in drainage systems.

- Hyd-3.1 requires the County to implement, and revise as necessary, ordinances that require new development to be located down and away from ridgelines, conform to the natural topography, not significantly alter dominant physical characteristics of the site, and maximize natural drainage and topography when conveying stormwater. As such, this will minimize stormwater runoff volumes and pollutant sources caused by new development.

- Hyd-4.1 requires the County to implement the Flood Damage Prevention Ordinance (Regulatory Code 91.1.105.10) to reduce flood losses in specified areas. This ordinance regulates development within flood-prone areas, thereby reducing potential overloading of stormwater systems.

- Hyd-4.2 requires the County to implement the Grading, Clearing and Watercourses Ordinance to limit activities affecting watercourses. This ordinance includes requirements to minimize runoff and improve water quality.

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- Hyd-4.3 requires the County to update and implement the following Board Policies: Policy I-68, Policy I-45, and Policy I-56. These policies work to minimize impacts to floodways, apply flood-control measures, and regulate flood control and drainage facilities, respectively. As such, exceedance of stormwater systems from increased runoff would be further reduced or avoided.

Cumulative Impact – Capacity of Stormwater Systems: Many of the cumulative projects included in the analysis are proposed to accommodate the expected population growth within the region. Impermeable surfaces, constructed under implementation of cumulative projects, would have the potential to contribute substantial quantities of runoff which would exceed the capacity of existing stormwater drainage systems, while contributing to substantial additional sources of polluted runoff. However, the majority of cumulative projects would be subject to CEQA and/or NEPA review, and local regulations that require development to construct or retrofit stormwater drainage systems so that they would not cause flooding. A significant cumulative impact would not occur. Therefore, the Project, in combination with the identified cumulative projects, would not contribute to a significant cumulative impact associated with the capacity of stormwater systems.

A-14 **Significant Effect – Dam Inundation and Flood Hazards**: The FEIR identifies potentially significant impacts associated with the exposure of people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam. This impact of the Project would be reduced to a less than significant level through implementation of identified General Plan policies and mitigation measures.

Mitigation Measures: Hyd-1.2, Hyd-1.5, Hyd-2.5, Hyd-4.1, Hyd-4.2, Hyd-4.3, Hyd-6.1, Hyd-8.1, and Hyd-8.2

Facts in Support of Finding: Within the unincorporated County there are approximately 13 dams that pose inundation risk in the event of a breach or failure. Approximately 34,000 acres of land within the Project area would be subject to flooding and inundation as a result of dam failure.

The Project includes policies from the General Plan Conservation and Open Space Element and the Safety Element that address development within flood hazard areas and dam inundation zones. The relevant policies are COS-5.1, S-9.1 through S-9.3, S-9.6, and S-10.1. These policies restrict development in floodways and floodplains, manage development based on Federal floodplain maps, require minimization of new development in floodplains, require new development within mapped flood hazard areas be sited and designed to minimize on-site and off-site hazards, prohibit development in dam inundation areas that may interfere with the County's emergency response and evacuation plans, and limit new or expanded land uses within floodways. Adherence to

these policies will reduce potential impacts from the placement of future development in flood hazard areas and/or dam inundation areas.

In addition, the Project includes mitigation measures which will mitigate potentially significant impacts to a less than significant level as follows:

- Hyd-1.2 requires the County to implement and revise as necessary the Watershed Protection Ordinance. Application of this ordinance requires measures to avoid flooding and would minimize potential exposure of people or structures to flood hazards.

- Hyd-1.5 is the utilization of County Guidelines for Determining Significance for Surface Water Quality, Hydrology, and Groundwater Resources to identify adverse environmental effects. This would include the identification of potential exposure of people or structures to floods or inundation. If such a situation were identified, appropriate mitigation measures would then be included in the action to avoid potential risk of loss.

- Hyd-2.5 requires the County to implement and revise as necessary the Resource Protection Ordinance and Policy I-68: Proposed Projects in Flood Plains / Floodways, to restrict development in flood plains / floodways. These regulations, therefore, also minimize potential exposure of people or structures to flooding and inundation.

- Hyd-4.1 requires the County to implement the Flood Damage Prevention Ordinance (Regulatory Code 91.1.105.10). This ordinance regulates development within flood-prone areas and minimizes potential risks to people and structures from flooding or inundation hazards.

- Hyd-4.2 requires the County to implement the Grading, Clearing and Watercourses Ordinance. The provisions of this ordinance require that flood hazard areas or areas of inundation be avoided, or otherwise made safe, prior to grading/clearing for development. This would further minimize exposure of people or structures to flooding and inundation.

- Hyd-4.3 requires the County to update and implement the following Board Policies: Policy I-68, Policy I-45, and Policy I-56. These policies include provisions to minimize impacts to floodways, apply flood-control measures, and regulate flood control and drainage facilities, respectively. Continuation of these policies will further minimize potential flooding and dam inundation hazards.

- Hyd-6.1 requires that the County implement the Resource Protection Ordinance to prohibit development of permanent structures for human habitation or employment in a floodway and require planning of hillside developments to minimize potential soil,

geological and drainage problems. As such, this ordinance limits development that would expose people or structures to flooding or inundation.

- Hyd-8.1 requires the County to perform regular inspections and maintenance of County reservoirs to prevent dam failure. This measure would minimize the potential for inundation of the surrounding area or zone and prevent losses or injuries.

- Hyd-8.2 requires that the County review discretionary projects for dam inundation hazards through application of the County's Guidelines for Determining Significance for Hydrology and Guidelines for Determining Significance for Emergency Response Plans. These guidelines help identify potential flooding and inundation hazards and apply methods for avoiding or mitigating those hazards.

Cumulative Impact – Dam Inundation and Flood Hazards: It is reasonably foreseeable that cumulative projects would place housing or structures within dam inundation areas, thereby increasing the potential for a significant risk of loss, injury or death involving flooding. However, multiple regulations exist, such as the National Flood Insurance Act, National Flood Insurance Reform Act, Cobey-Alquist Floodplain Management Act, and local regulations that would be expected to mitigate any potential impacts to below a level of significance. A significant cumulative impact would not occur. Therefore, the Project, in combination with the identified cumulative projects, would not contribute to a significant cumulative impact associated with dam inundation and flood hazards.

A-15 **Significant Effect – Seiche, Tsunami and Mudflow Hazards**: The FEIR identifies potentially significant impacts that would expose people or structures to a significant risk of loss, injury, or death from mudflow hazards. This impact of the Project would be reduced to a less than significant level through implementation of identified General Plan policies and mitigation measures.

Mitigation Measures: Hyd-3.1, Hyd-3.2, and Hyd-3.3

Facts in Support of Finding: Potential impacts associated with tsunamis or seiches are considered to be less than significant for the Project. However, mudflows are the most common disasters in San Diego, and the Project area is particularly susceptible to flash floods and debris flows during rainstorms. Residential, commercial and industrial land uses, as designated under the Project, increase the risk of exposing people or structures to damage in the event of a mudflow.

The Project includes policies from the General Plan Conservation and Open Space Element and the Safety Element that address potential mudflow hazards. The relevant policies are COS-5.1, S-8.1, S-8.2, S-9.3, and S-9.6. These policies restrict development in floodways and floodplains, reduce landslide risks to development, prohibit development from contributing or causing slope instability, require minimization of

development in flood hazard areas, and prohibit development in dam inundation areas. Adherence to these policies will reduce impacts to people or structures from mudflows.

In addition, the Project includes mitigation measures which will mitigate potentially significant impacts to a less than significant level as follows:

- Hyd-3.1 requires the County to implement and revise as necessary ordinances to require new development to be located down and away from ridgelines, conform to the natural topography, not significantly alter dominant physical characteristics of the site, and maximize natural drainage and topography when conveying stormwater. These provisions will minimize development that exposes people and property to mudflow hazards.

- Hyd-3.2 requires the County to implement and revise as necessary the Resource Protection Ordinance to limit development on steep slopes. It also incorporates the Hillside Development Policy into the Resource Protection Ordinance to the extent that it will allow for one comprehensive approach to steep-slope protections. By minimizing development on steep slopes, risks of loss, injury or death from mudflows will be prevented.

- Hyd-3.3 is the implementation the Grading, Clearing and Watercourses Ordinance to protect development sites against erosion and instability. These protections will reduce potential mudflows around people and structures.

Cumulative Impact – Seiche, Tsunami and Mudflow Hazards: Cumulative projects in surrounding jurisdictions on the coast have the potential to expose people or structures to loss, injury or death involving inundation of a tsunami, due to the inherent risk involved with coastal development. However, the Project has no risk of tsunami and so it would not contribute to a cumulative impact. Additionally, cumulative projects would be located in the vicinity of natural water bodies that have the potential to be affected by a seiche, thereby exposing people and structures to flooding from this natural disaster. Mudflows would also potentially affect cumulative projects, especially in surrounding jurisdictions that have been affected by the extreme wildfire events in the recent past. However, the majority of cumulative projects would be subject to CEQA and/or NEPA review, in addition to compliance with applicable regulations such as the National Flood Insurance Act, National Flood Insurance Reform Act, Cobey-Alquist Floodplain Management Act and local regulations, and impacts would be reduced to a level below significant. A cumulative impact would not occur. Therefore, the Project, in combination with the identified cumulative projects, would not contribute to a significant cumulative impact associated with seiche, tsunami, and mudflow hazards.

LAND USE

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A-16 **Significant Effect – Physical Division of an Established Community**: The FEIR identifies potentially significant impacts associated with the physical division of an established community. This impact of the Project would be reduced to a less than significant level through implementation of identified General Plan policies and mitigation measures.

Mitigation Measures: Lan-1.1 through Lan-1.3

Facts in Support of Finding: Implementation of the proposed Project would result in the expansion through reclassification of one road segment in the Alpine CPA; but would not result in the planning for or construction of alternative transportation routes or associated large structures; or, establishment of any new large areas of open space that would have the potential to physically divide an established community. However, considering circulation impacts in the Alpine CPA as a result of the proposed Project would rely on roadway improvements and expansions outlined in the General Plan Update PEIR, the potentially significant impact determination identified in the General Plan Update PEIR related to dividing an established community would still apply to the proposed Project.

The Project includes policies from the General Plan Land Use Element, Mobility Element, and Housing Element that address community character and compatibility for future development and infrastructure. The relevant policies are LU-1.4, LU-2.1, LU-2.3, LU-2.5, LU-4.1, LU-4.2, LU-4.3, LU-4.4, LU-11.2, LU-12.4, M-10.6, M-1.3, and H-2.1. These policies require future circulation improvements and developments to be consistent with the character of an established community, require road design considerations that avoid bisecting communities or town centers, support conservation-oriented project design when consistent the applicable community plan, require certain residential subdivisions to conserve open space and natural resources, require incorporation of natural features into proposed development, require contiguous open space areas, require new development to conform to the natural topography, require new residential development to be integrated with existing neighborhoods, and require the location and development of private roads to minimize visual impacts. Adherence to these policies will reduce potential impacts associated with physical division of established communities from future development and infrastructure.

In addition, the Project includes mitigation measures which will mitigate potentially significant impacts to a less than significant level as follows:

- Lan-1.1 requires coordination with adjacent cities and other agencies regarding planning efforts and resource protection. It specifically requires coordination with SANDAG during updates to the Regional Transportation Plan to ensure that regional roads are properly planned, sited, and designed. Consultation and coordination with this and other agencies will allow better planning of infrastructure and prevent significant impacts to communities from incompatible facilities.

- Lan-1.2 requires coordination with land owners, other departments, and community groups to ensure that both public and private development projects and associated infrastructure minimize impacts to established communities. This involves community input and General Plan conformance reviews on County road projects to insure that County road planning and development is consistent with the General Plan. This also includes analysis of potential environmental impacts for public and private road projects and application of mitigation measures pursuant to CEQA. Department of Public Works policies and procedures shall be evaluated to ensure that such reviews are conducted and that issues regarding potential division of communities are identified and addressed. General Plan Amendments that propose changes to the circulation network shall be kept consistent with the General Plan Goals and Policies, and such proposals will also be reviewed by the communities. In addition, Board Policy I-63, which contains provisions for General Plan Amendments, and/or department procedures will be updated to meet this standard.

- Lan-1.3 requires the County to maintain plans and standards for infrastructure and roads so that divisions of communities do not occur. This will include: 1) updates to County Road Standards to ensure that roads are designed and built in a safe manner consistent with the General Plan and community context; 2) adherence to Community Plans to guide infrastructure planning in the individual and unique communities of the County; 3) evaluation and, if necessary, revisions to the subdivision ordinance to ensure future project designs, and corresponding infrastructure designs, are consistent with the General Plan and with established community character; 4) preparation of local public road network plans to improve mobility, connectivity, and safety; and 5) preparation of community road standards that supplement the County road standards in order to recognize the unique constraints and character of different communities. These efforts will minimize the potential impacts of future infrastructure on established communities.

Cumulative Impact – Physical Division of an Established Community: Cumulative projects would include the construction of new or widened roadways, airports, railroad tracks, open space areas, or other features that would individually have the potential to physically divide an established community. In addition to these larger projects, smaller cumulative projects could have the effect of providing a barrier to access that would physically divide a community. Such impacts would generally be limited to an individual community. Multiple projects in the same community could combine to result in a cumulative effect to the division of that community. The General Plan Update has the potential to contribute to this cumulative impact only as it pertains to new roads, road extensions and roadway widenings because other land uses that could divide a community, such as a railroads and airports are not proposed in the General Plan Update and, large open space areas are not proposed in areas that would affect established communities. Implementation of the proposed General Plan Update policies

and mitigation measures described above would mitigate the cumulative impacts to below a level of significance.

NOISE

A-17 **Significant Effect – Excessive Noise Levels**: The FEIR identifies potentially significant impacts related to the exposure of any existing or reasonably foreseeable future noise sensitive land uses to exterior or interior noise, including existing and planned Mobility Element roadways, railroads, and all other noise sources. This impact of the Project would be reduced to a less than significant level through implementation of identified General Plan policies and mitigation measures.

Mitigation Measures: Noi-1.1 through Noi-1.9

Facts in Support of Finding: Roadway systems are the predominant source of noise exposure in the County, followed by airport noise and rail operations. As such, future development under the proposed Project located near roadways or railroads would have the greatest potential to expose future noise sensitive land uses to excessive noise levels. Additionally, future development under the proposed Project that would increase traffic on roadways or railroads would have the potential to expose noise sensitive land uses near these noise sources to increased noise levels. The greatest increase in traffic associated with the proposed Project, and therefore increases noise levels, would be concentrated in the Community of Alpine on a portion of Alpine Boulevard, West Willows Road, and East Willows.

The Project includes policies from the General Plan Land Use Element, the Mobility Element, and the Noise Element that address excessive noise level impacts. The relevant policies are LU-2.8, M-1.3, M-2.4, N-1.4, N-1.5, N-2.1, N-2.2, N-4.1, N-4.3, N-4.2, N-4.5, N-4.7, and N-4.8. These policies require preparation of an acoustical study where development has the potential to directly result in noise sensitive land uses being subject to excessive noise levels, require a solid noise barrier be incorporated into development design when the exterior noise level on patios or balconies would be excessive, ensure that increases in average daily traffic do not substantially increase cumulative traffic noise to noise sensitive land uses, require inclusion of traffic calming design that minimizes traffic noise; promote the location of new or expanded roads where the impact to noise sensitive land uses would be minimized, require coordination with other agencies to minimize impacts to noise sensitive land uses from railroad operations, promote establishment of train horn "quiet zones," require measures that minimize significant impacts to surrounding areas from uses or operations that cause excessive noise, and incorporate buffers or other noise reduction measures into the siting and design of roads located next to sensitive noise receptors. Adherence to these policies will reduce exposure of noise sensitive land uses to exterior and interior noise impacts.

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In addition, the Project includes mitigation measures which will mitigate potentially significant impacts to a less than significant level as follows:

- Noi-1.1 requires an acoustical analysis whenever development may result in any existing or future noise sensitive land uses being subject to on-site noise levels of 60 dBA (CNEL) or greater, or other land uses that may result in noise levels exceeding the "Acceptable" standard in the Noise Compatibility Guidelines. The analysis will determine whether significant impacts may occur and incorporate attenuation measures within the Project to meet the compatibility guidelines.

- Noi-1.2 is the revision of Guidelines for Determining Significance - Noise for new developments where the exterior noise level on patios or balconies for multi-family residences or mixed-use development exceeds 65 dBA (CNEL); a solid noise barrier is incorporated into the building design of balconies and patios for units that exceed 65 dBA (CNEL) while still maintaining the openness of the patio or balcony. This measure will alleviate excessive noise level impacts on residents while meeting compatibility guidelines.

- Noi-1.3 requires that an acoustical study be done for projects proposing amendments to the County General Plan Land Use Element and/or Mobility Element when a significant increase to the average daily traffic is proposed compared to traffic anticipated in the General Plan. This measure will identify unanticipated noise level increases for sensitive land uses and allow appropriate project revisions or mitigation to be identified.

- Noi-1.4 is the revision of the Guidelines for Determining Significance - Noise standard mitigation and project design considerations to promote traffic calming design, traffic control measures, and low-noise pavement surfaces that minimize motor vehicle traffic noise. These mitigation and design standards will minimize potential noise impacts on noise-sensitive land uses.

- Noi-1.5 requires coordination with Caltrans and SANDAG as appropriate to identify and analyze appropriate route alternatives that may minimize noise impacts to noise sensitive land uses within the unincorporated areas of San Diego County.

- Noi-1.6 requires coordination with SANDAG, MTS, California High-Speed Rail Authority as appropriate, and passenger and freight train operators to install noise attenuation features to minimize impacts to adjacent residential or other noise sensitive land uses.

- Noi-1.7 requires coordination with project applicants during the scoping phase of proposed projects to take into consideration impacts resulting from on-site noise generation to noise sensitive land uses located outside the County's jurisdictional authority. The County will notify and coordinate with the appropriate jurisdiction(s) to

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determine appropriate project design techniques and/or mitigation. This will prevent cumulatively considerable noise impacts to surrounding jurisdictions.

- Noi-1.8 is the implementation of procedures (or cooperative agreements) with Caltrans, the City of San Diego, and other jurisdictions as appropriate to ensure that a public participation process or forum is available for the affected community to participate and discuss issues regarding transportation generated noise impacts for new or expanded roadway projects that may affect noise sensitive land uses within the unincorporated areas of San Diego County.

- Noi-1.9 is the coordination with Caltrans, the County Landscape Architect, and community representatives (e.g., Planning or Sponsor Group) to determine the appropriate noise mitigation measures (planted berms, noise attenuation barriers or a combination of the two) to be required as a part of the proposals for roadway improvement projects. It also requires that the County's Five Year Capital Improvement Program and Preliminary Engineering Reports address noise impacts and include appropriate mitigation measures for road improvement projects within or affecting the unincorporated area of the County.

Cumulative Impact – Excessive Noise Levels: A cumulative noise impact would occur if construction and operation associated with cumulative regional land use projects, such as those identified in adjacent city and county general plans and regional transportation plans, combined would exceed the noise compatibility guidelines and standards of the Noise Element. In addition, the Project would have the potential to contribute to a potentially significant cumulative impact associated with excessive noise levels. However, implementation of the General Plan policies and mitigation measures would mitigate these impacts to a level below significant.

A-18 **Significant Effect – Excessive Groundborne Vibration**: The FEIR identifies potentially significant impacts related to the exposure of vibration sensitive uses to ground-borne vibration and noise equal to or in excess of established levels, or if new sensitive land uses would be located in the vicinity of ground-borne vibration inducing land uses such as railroads or mining operations. This impact of the Project would be reduced to a less than significant level through implementation of identified General Plan policies and mitigation measures.

Mitigation Measures: Noi-1.7, and Noi-2.1 through Noi-2.4

Facts in Support of Finding: The operation of heavy construction equipment, construction activities such as pile driving or blasting, mining/mineral extraction activities, and railroad operations are all typical sources of groundborne vibration. Sensitive receptors, including residences, in proximity of these groundborne vibration sources can experience vibrations in a manner ranging from no perceptible effects at the lowest levels, low rumbling sounds and perceptible vibrations at moderate levels, and slight

damage at the highest levels. Future development under the proposed Project in the buildout scenario would potentially result in development that would experience excessive groundborne vibration associated with construction projects, mining/mineral extraction or railroad activities.

The Project includes policies from the General Plan Noise Element that address groundborne vibration impacts. The relevant policies are N-3.1, N-4.7, N-5.2, N-6.3, and N-6.4. These policies require the use of Federal Transit Administration and Federal Railroad Administration guidelines to limit the extent of exposure that sensitive uses have the potential to have to groundborne vibration from potential sources, require the County to work with SANDAG, Metropolitan Transit Services and passenger and freight rail operators to minimize impacts to residential and other sensitive land uses, require location of industrial facilities in areas that would minimize impacts to sensitive land uses, require development to limit the frequency of use of high-noise equipment, and require development to limit the hours of operation as appropriate for non-emergency noise-producing activities such as: construction, maintenance, trash collection, and parking lot sweeper activity. Adherence to these policies will reduce exposure of vibration sensitive land uses to sources of groundborne vibration.

In addition, the Project includes mitigation measures which will mitigate potentially significant impacts to a less than significant level as follows:

- Noi-1.7 requires coordination with project applicants during the scoping phase of proposed projects to take into consideration impacts resulting from on-site noise generation to noise sensitive land uses located outside the County's jurisdictional authority. The County will notify and coordinate with the appropriate jurisdiction(s) to determine appropriate project design techniques and/or mitigation. This will prevent cumulatively considerable noise and vibration impacts to surrounding jurisdictions.

- Noi-2.1 requires a ground-borne vibration technical study for projects that are in certain land use designations and within a certain distance of the Sprinter Rail Line. The specific screening criteria are provided in Table 4 of the County of San Diego Guidelines for Determining Significance - Noise. If significant impacts are determined based on the technical study, mitigation measures or design features will be required as part of the Project.

- Noi-2.2 requires revisions to the County of San Diego Guidelines for Determining Significance - Noise to reflect limits in the Noise Compatibility Guidelines and Noise Standards [Policy N-3.1] from the General Plan Update. This measure also requires the County to periodically review the Guidelines to incorporate standards for minimizing effects of groundborne vibration during Project operation or construction.

- Noi-2.3 requires that industrial facility projects be reviewed to ensure they are located in areas that would minimize impacts to noise-sensitive land uses. It further

requires revisions to the County of San Diego Guidelines for Determining Significance - Noise to incorporate appropriate noise attenuation measures for minimizing industrial-related noise. This will prevent direct and cumulative groundborne vibration impacts to sensitive land use types.

- Noi-2.4 requires that an acoustical study accompany extractive mining projects that may affect noise-sensitive land uses. Similarly, it requires an acoustical study for noise-sensitive land use projects proposed near existing extractive land use facilities. The results of the acoustical study may require a "buffer zone" or other mitigating features to ensure that potential vibration impacts are not significant.

Cumulative Impact – Excessive Groundborne Vibration: A cumulative ground-borne vibration impact would occur if one or more cumulative projects would exceed the FTA and Federal Railroad Administration guidelines for groundborne vibration and noise. However, there are no specific plans or time scales for individual construction projects. Therefore, it is not possible to determine exact vibration levels, locations, or time periods for construction. Potential vibration impacts from construction would need to be analyzed on a case-by-case basis. Therefore, cumulative projects have the potential to result in a significant cumulative impact if they were located in close proximity to one another and construction of multiple cumulative projects were to occur at the same time. In addition, the project would have the potential to contribute to a potentially significant cumulative impact associated with excessive groundborne vibration. However, implementation of the General Plan policies and mitigation measures would reduce the project's potential direct impact and contribution to a cumulative impact to a less than significant level.

A-19 **Significant Effect – Temporary Increase in Ambient Noise Levels**: The FEIR identifies potentially significant impacts related to the substantial temporary or periodic increase in ambient noise levels during construction which, together with noise from all sources, would exceed the standards listed in San Diego County Code Sections 36.408 and 36.409. This impact of the Project would be reduced to a less than significant level through implementation of identified General Plan policies and mitigation measures.

Mitigation Measures: Noi-4.1 and Noi-4.2

Facts in Support of Finding: Future development under the Project would necessitate construction activities, such as site grading, truck/construction equipment movement, engine noise, rock excavation, rock crushing, and blasting. Noise generated from these activities, when combined with all other noise in the given area, has the potential to exceed Noise Ordinance standards.

The Project includes policies from the General Plan Noise Element that address temporary and/or nuisance noise. The relevant policies are N-6.1 through N-6.6. Adherence to these policies will reduce impacts related to temporary or periodic

increases in ambient noise levels by enacting ordinances to regulate impacts from noise and enforce noise regulations to ensure no violations of noise standards occur.

In addition, the Project includes mitigation measures which will mitigate potentially significant impacts to a less than significant level as follows:

- Noi-4.1 requires Noise Ordinance and Zoning Ordinance review and revision as necessary to ensure appropriate restrictions for intermittent, short-term, or other nuisance noise sources. This will ensure that mechanisms are in place to enforce limits on temporary noise impacts.

- Noi-4.2 requires that the County maintain staff and equipment as appropriate to facilitate enforcement of the Noise Ordinance. This will ensure that temporary noise impacts can be regulated immediately when identified.

Cumulative Impact – Temporary Increase in Ambient Noise Levels: A cumulative noise impact would occur if construction associated with one or more projects in close proximity to one another would result in combined noise levels that would temporarily increase ambient noise levels beyond the standards in the County Noise Ordinance. However, since there are no specific plans or time scales for individual projects, it is not possible to determine exact noise levels, locations, or time periods for construction. Additionally, projects would have to be constructed in close proximity to each other to result in a cumulative impact. Construction projects in incorporated jurisdictions would be subject to noise standards and limits for the jurisdiction in which they are proposed. Projects proposed in the Country of Mexico along the U.S./Mexico international border and on tribal lands would not be subject to County of San Diego noise regulations and standards; however, potential construction noise-related impacts in these areas would be temporary and limited to the area immediately surrounding the Project. Similarly, a cumulative nuisance noise impact would occur if noise associated with one or more land uses in an area would result in combined noise levels that would temporarily increase ambient noise levels beyond the standards in the County Noise Ordinance. However, these events would be short-term and event-specific in nature. Therefore, a potentially significant cumulative impact associated with temporary increase in ambient noise levels would not occur. The Project would not contribute to a significant cumulative impact.

A-20 **Significant Effect – Excessive Noise Exposure from a Public or Private Airport**: The FEIR identifies potentially significant impacts related to the exposure of people residing or working in the Project area to excessive noise levels from a public airport or private. This impact of the Project would be reduced to a less than significant level through implementation of identified General Plan policies and mitigation measures.

Mitigation Measures: Noi-5.1 through Noi-5.3

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Facts in Support of Finding: Future development under the proposed Project in the buildout scenario would result in excessive noise exposure from a public or private airport due to construction of new land uses and infrastructure in areas subject to public or private airport noise exposure.

The Project includes policies from the General Plan Noise Element and Safety Element that address noise exposure from public or private airports. The relevant policies are N-4.9, S-15.1, S-15.2, and S-15.4. These policies assure the noise compatibility of development that would have the potential to be affected by noise from public or private airports and helipads during project review, require land uses surrounding airports to be compatible with airport operations, require operational plans for new and existing airports to be compatible with land uses that surround the airport facility, ensure that private airstrips and heliports are located outside of the safety zones and flight paths of existing airports, and require land uses surrounding airports to be compatible with airport operations. Adherence to these policies will reduce excessive noise impacts to people in the project area from public and private airports.

In addition, the Project includes mitigation measures which will mitigate potentially significant impacts to a less than significant level as follows:

- Noi-5.1 requires use of the applicable Airport Land Use Compatibility Plan's (ALUCP) as guidance/reference during development review of projects that are planned within an Airport Influence Area (AIA). In addition, any projects that are within the AIA are required to be submitted to the SDCRAA for review. This will help ensure that incompatible land uses are not developed in areas of excessive noise exposure from airports.

- Noi-5.2 requires that private airport or heliport uses proposed in the County unincorporated are evaluated for potentially significant noise impacts and for consistency with the FAA standards. This will minimize potential noise exposure associated with private airports.

- Noi-5.3 requires that the County consult with the FAA standards and the County Noise Ordinance as a guide for assessing noise impacts from private airports and helipads. This will minimize potential noise exposure associated with private airports and helipads.

Cumulative Impact – Excessive Noise Exposure from a Public or Private Airport: A cumulative noise impact would occur if construction and operation associated with cumulative regional land use projects, such as those identified in adjacent city and county general plans and regional transportation plans, when combined would result in the exposure of noise sensitive land uses to excessive noise from a public or private airport. Even though required regulations would minimize the cumulative impact of projects in the U.S, development in Mexico along the U.S./Mexico international border or

on tribal lands within the vicinity of existing noise sensitive land uses would not be required to comply with the same noise standards and a potentially significant cumulative impact to would occur. In addition, the Project would have the potential to contribute to a potentially significant cumulative impact associated with excessive noise exposure from airports. However, implementation of the General Plan policies and corresponding implementation projects, in addition to compliance with the 1990 California Airport Noise Standards and applicable ALUCPs, would reduce potential cumulative impacts to a less than significant level.

PUBLIC SERVICES

A-21 **Significant Effect – Fire Protection Services**: The FEIR identifies potentially significant impacts related to the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection. This impact of the Project would be reduced to a less than significant level through implementation of identified General Plan policies and mitigation measures.

Mitigation Measures: Pub-1.1 through Pub-1.9, as well as other measures listed in Sections 2.1 through 2.15 of the SEIR related to specific resources that may be adversely affected by construction of fire protection facilities.

Facts in Support of Finding: Under the proposed Project, the travel times for emergency fire response would be required to achieve standards provided in the Safety Element of the General Plan, and acceptable service ratios would need to be maintained for the various fire districts. To consistently meet such standards during build-out, the construction or expansion of new fire facilities will be required, which would have the potential to result in substantial adverse impacts to the environment.

The Project includes policies from the General Plan Land Use Element and Safety Element that address fire protection services. The relevant policies are LU-1.4, LU-6.4, LU-6.11, LU-12.3, LU-12.4, S-3.4, S-5.1, S-5.2, and S-6.1 through S-6.5. Adherence to these policies will minimize deterioration of fire agency response times and will ensure that environmental impacts related to the construction or expansion of additional facilities will be mitigated.

Mitigation measures identified in Chapters 2.1 through 2.15 of the SEIR would also mitigate direct and cumulative impacts related to the construction or expansion of fire protection facilities. Mitigation measures listed in these sections require that the development of new or expanded facilities be evaluated pursuant to the environmental resource(s) potentially affected. In addition, the following mitigation measures would also contribute to reducing impacts related to the construction or expansion of fire protection facilities to a less than significant level:

- Pub-1.1 is the participation in interjurisdictional reviews to gather information on and review and provide comments on plans for new or expanded governmental facilities in the region. This will ensure that potential environmental impacts associated with new or expanded public services are identified and adequately mitigated and will ensure that new or expanded facilities are appropriately located.

- Pub-1.2 requires that the County plan and site governmental facilities that are context-specific according to their location in village, semi-rural, or rural lands. This will minimize potential environmental effects that result from incompatible uses (e.g., visual impacts, noise impacts, groundwater impacts, etc.).

- Pub-1.3 is the revision of Board Policy I-63 to minimize leapfrog development and to establish specific criteria for General Plan Amendments proposing expansion of areas designated Village regional category. This is intended to limit unexpected demands for new or expanded public services and the associated governmental facilities.

- Pub-1.4 requires that General Plan Amendments be reviewed for consistency with the goals and policies of the General Plan such that future development in hazardous wildfire areas will be limited to low-density land uses that do not necessitate extensive new fire protection facilities.

- Pub-1.5 is the implementation, and revision if necessary, of Board Policy I-84 requiring that discretionary project applications include commitments from available fire protection districts. This measure also requires that commitments from fire protection districts demonstrate that acceptable travel times can be met in accordance with the General Plan. By ensuring that development projects have adequate fire service, the need for new or expanded facilities can be minimized.

- Pub-1.6 is the continued use of the County GIS and the County Guidelines for Determining Significance to identify fire prone areas during the review of development projects. This measure further mandates that development proposals meet requirements set by the fire authority having jurisdiction (FAHJ) and that new/additional fire protection facilities are not required; or, if such facilities are required, that potential environmental impacts resulting from construction are evaluated along with the development project under review. This will minimize the need for new or expanded facilities, and will ensure that impacts are analyzed and mitigated when new or expanded facilities are required.

- Pub-1.7 requires enforcement of the Building and Fire Code to ensure there are adequate fire protections in place associated with the construction of structures and their defensibility, accessibility and egress, adequate water supply, coverage by the

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local fire district, and other critical issues. This will minimize the need for new fire protection facilities to accommodate new development.

- Pub-1.8 requires that the County complete CEQA reviews for environmental impacts on new public facilities (fire, sheriff, libraries, etc.) or significant expansions of such facilities. It also requires mitigation of environmental impacts associated with such facilities to the extent feasible.

- Pub-1.9 requires the County to establish and implement procedures that ensure new development projects fund their fair share toward fire services facilities. This may include development of a long-term financing mechanism, such as an impact fee program or community facilities development, as appropriate. This measure further continues the requirement that large development projects provide their fair share contribution to fire services either by providing additional funds and/or development of infrastructure. This measure will ensure that new or expanded fire protection facilities will be correlated with the need for such services and that impacts from their construction will be addressed with mitigation identified early in the process.

Cumulative Impact – Fire Protection Services: Fire protection services within the region often cross inter-jurisdictional boundaries. Cumulative projects would result in a need for additional fire protection services to serve new development. Cumulative projects proposed under general plans of surrounding cities and counties, such as commercial, residential or industrial projects, would require fire protection services from fire agencies within the region. While the majority of cumulative fire protection projects would undergo environmental review, and would be required to demonstrate compliance with CEQA and/or NEPA prior to project approval, they would incrementally increase the need for fire services, which would have the potential to result in a significant cumulative impact. Implementation of the proposed General Plan Update would have the potential to result in a significant impact. However, implementation of the General Plan policies and mitigation measures described above and in Sections 2.1 through 2.15 of the SEIR would reduce potentially significant direct and cumulative impacts to below a level of significance. Therefore, the Project would not contribute to a significant cumulative impact associated with fire protection services.

A-22 **Significant Effect – Police Protection Services**: The FEIR identifies significant impacts related to the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection services. This impact of the Project would be reduced to a less than significant level through implementation of identified General Plan policies and mitigation measures.

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Mitigation Measures: Pub-1.1, Pub-1.2, and Pub-1.3, as well as other measures listed in Sections 2.1 through 2.15 of the SEIR related to specific resources that may be adversely affected by construction of police service facilities.

Facts in Support of Finding: Build out of the proposed General Plan Update would result in a need for increased police services, including the potential need for new police facilities in order to maintain service standards set by the San Diego County Sheriff's Department (SDSD). As such, the construction or expansion of police facilities will be required, which would have the potential to result in substantial adverse impacts to the environment.

The Project includes policies from the General Plan Land Use Element that address police protection facilities. The relevant policies are LU-1.4, LU-12.3, and LU-12.4. Adherence to these policies will minimize the deterioration of police response times and reduce impacts related to the construction or expansion of additional facilities needed to serve the projected population growth of the unincorporated County.

Mitigation measures identified in Chapters 2.1 through 2.15 of the SEIR would also mitigate direct and cumulative impacts related to the construction or expansion of police protection facilities. Mitigation measures listed in these sections require that the development of new or expanded facilities be evaluated pursuant to the environmental resource(s) potentially affected. In addition, the following mitigation measures would also contribute to reducing impacts related to the construction or expansion of police protection facilities to a less than significant level:

- Pub-1.1 is the participation in interjurisdictional reviews to gather information on and review and provide comments on plans for new or expanded governmental facilities in the region. This will ensure that potential environmental impacts associated with new or expanded public services are identified and adequately mitigated.

- Pub-1.2 requires that the County plan and site governmental facilities that are context-specific according to their location in village, semi-rural, or rural lands. This will minimize potential environmental effects that result from incompatible uses (e.g., visual impacts, noise impacts, groundwater impacts, etc.).

- Pub-1.3 is the revision of Board Policy I-63 to minimize leapfrog development and to establish specific criteria for General Plan Amendments proposing expansion of areas designated Village regional category. This is intended to limit unexpected demands for new or expanded public services and the associated governmental facilities.

Cumulative Impact – Police Protection Services: Cumulative projects in the San Diego region would require increased police protection services to serve new development. The increase in demand for police protection services from

implementation of cumulative projects would have the potential to result in the need to construct or expand existing police facilities, which would have the potential to create an adverse impact on the environment. While the majority of cumulative projects would undergo environmental review, and would be required to demonstrate compliance with CEQA and/or NEPA prior to project approval, they would incrementally increase the need for police services, which would have the potential to result in a significant cumulative impact. In addition, the General Plan Update would result in a potentially significant direct impact. However, implementation of the General Plan policies and mitigation measures listed above and in Sections 2.1 through 2.15 of the SEIR would reduce potentially significant direct and cumulative impacts to a level of less than significant. Therefore, the Project would not contribute to a significant cumulative impact associated with police protection services.

A-23 **Significant Effect – Other Public Facilities**: The FEIR identifies potentially significant impacts related to the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives relating to libraries. This impact of the Project would be reduced to a less than significant level through implementation of identified General Plan policies and mitigation measures.

Mitigation Measures: Pub-1.1, Pub-1.2, and Pub-1.3, as well as other measures listed in Sections 2.1 through 2.15 of the SEIR related to specific resources that may be adversely affected by construction of libraries.

Facts in Support of Finding: Build out of the proposed General Plan Update would result in an increase in the number of persons that must be provided with public library services. As such, the construction or expansion of library facilities will be required in order to maintain adequate service levels established by the San Diego County Library (SDCL) system. This would have the potential to result in substantial adverse impacts to the environment.

The Project includes policies from the General Plan Land Use Element that address the need for new or expanded library facilities. The relevant policies are LU-1.4, LU-9.4, LU-9.7, LU-12.3, LU-12.4, LU-17.1 through LU-17.4, LU-18.1, and LU-18.2. Adherence to these policies would reduce environmental impacts associated with the need to construct additional library facilities.

Mitigation measures identified in Chapters 2.1 through 2.15 of the SEIR would also mitigate direct and cumulative impacts related to the construction or expansion of library facilities. Mitigation measures listed in these sections require that the development of new or expanded facilities be evaluated pursuant to the environmental resource(s) potentially affected. In addition, the following mitigation measures would also contribute to reducing impacts related to the construction or expansion of library service facilities to a less than significant level:

- Pub-1.1 is the participation in interjurisdictional reviews to gather information on and review and provide comments on plans for new or expanded governmental facilities in the region. This will ensure that potential environmental impacts associated with new or expanded public services are identified and adequately mitigated.

- Pub-1.2 requires that the County plan and site governmental facilities that are context-specific according to their location in village, semi-rural, or rural lands. This will minimize potential environmental effects that result from incompatible uses (e.g., visual impacts, noise impacts, groundwater impacts, etc.).

- Pub-1.3 is the revision of Board Policy I-63 to minimize leapfrog development and to establish specific criteria for General Plan Amendments proposing expansion of areas designated Village regional category. This is intended to limit unexpected demands for new or expanded public services and the associated governmental facilities.

Cumulative Impact – Other Public Services: The San Diego County Library serves the entire unincorporated County and portions of surrounding incorporated cities. Cumulative projects that involve residential development would increase the population of library users, and result in the need to construct additional or renovate existing library facilities, which would result in a significant environmental impact. The increase in demand for library services from implementation of cumulative projects would result in the need to construct additional or expand existing library facilities, which would create an adverse impact on the environment. While the majority of cumulative projects would undergo environmental review, and would be required to demonstrate compliance with CEQA and/or NEPA prior to project approval, they would incrementally increase the need for library facilities, which could have the potential to result in a significant cumulative impact. Implementation of the General Plan Update result in a potentially significant impact associated with the construction of new or expanded library facilities. However, General Plan policies and mitigation measures listed above and in Sections 2.1 through 2.15 of the SEIR would reduce potentially significant direct and cumulative impacts to a less than significant level. Therefore, the Project would not contribute to a significant cumulative impact associated with library use and other public services.

RECREATION

A-24 **Significant Effect – Deterioration of Parks and Recreational Facilities**: The FEIR identifies potentially significant impacts related to increased use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated. This impact of the Project would be reduced to a less than significant level through implementation of identified General Plan policies and mitigation measures.

Mitigation Measures: Rec-1.1 through Rec-1.11.

Facts in Support of Finding: The General Plan Update would result in an increase in the demand for recreational facilities, which has the potential to result in the deterioration of existing facilities. The current acreage of local park land would not meet projected goals; however, the existing supply of regional park area is expected to adequately meet the projected goals under the General Plan Update. If additional acreages of local park land are not provided in correlation with build-out of the Project, then accelerated deterioration of existing recreational facilities may occur.

The Project includes policies from the General Plan Land Use Element, Housing Element, Mobility Element, and Conservation and Open Space Element that address the deterioration of parks and recreational facilities. The relevant policies are LU-12.1, LU-12.2, M-12.1 through M-12.8, M-12.10, H-2.2, COS-21.1, COS-21.2, COS-22.1, COS-23.1, COS-23.2, COS-24.1, and COS-24.2. These policies require concurrency of infrastructure and services with development, prohibit new development that degrades existing facilities, reduce recreational facility deterioration by requiring fees or the construction of new recreational facilities, encourage the acquisition of new recreational lands and the construction of additional trails, identify trail improvement strategies, encourage funding opportunities for recreational facilities, provide guidance for improving recreational facilities within the County, require certain projects to include on-site common open space, promote the diversity of recreational facilities, encourage the location of new parks into community center areas, promote acquisition of valuable open space resources, provide for additional public access and regional coordination so that additional recreational opportunities can be made to County residents, set recreation contributions for new development, and establishing maximum funding opportunities. Adherence to these policies would minimize physical deterioration of parks or other recreational facilities.

In addition, the Project includes mitigation measures which will mitigate potentially significant impacts to a less than significant level as follows:

- Rec-1.1 is the implementation of Board Policy I-44 to identify park and recreation needs and priorities for communities, and utilize the Community Plans when identifying park and recreation facility requirements. This will help ensure that additional facilities are directed to areas with greatest need, thereby reducing overuse of existing parks and facilities.

- Rec-1.2 requires coordination with communities, agencies and organizations to identify, prioritize and develop park and recreation needs. This shall include pursuing partnership opportunities with school districts and other agencies to develop new park and recreation facilities; on-going support of the Park Advisory Committee and use of community center surveys to solicit input on park and recreation program and

facility needs and issues; and continuing partnerships with other jurisdictions to share operation and maintenance costs for facilities via joint powers agreements.

- Rec-1.3 is a County design manual to provide concepts for park and recreation facility components. This will ensure that parks and recreation facilities are designed to be compatible with their surroundings and to meet community needs, thereby minimizing overuse of other facilities.

- Rec-1.4 requires that residential projects with 50 or more units identify park facility needs and meet Subdivision Ordinance requirements for provision of trail and pathways shown on the Regional Trails Plan or Community Trails Master Plan. In addition, this measure requires the County to develop standards and design guidelines for large residential projects to include common open space amenities, such as tot lots, and the use of universal design features that accommodate both abled and disabled individuals. These steps will help ensure that recreational facility development is correlated with residential development.

- Rec-1.5 requires the County to attain funding for land acquisition and construction of recreational facilities by taking the following actions: implement the PLDO; solicit grants and bonds to fund the operation and maintenance of park and recreation facilities; and form Landscape Improvement Districts and County Service Areas. The acquisition of land and construction of recreational facilities will further prevent potential deterioration of existing facilities.

- Rec-1.6 is the County acquisition of trail routes across private lands through direct purchase, easements, and dedication, or by other means from a willing property owner/seller. This measure will also encourage voluntary dedication of easements and/or gifts of land for trails through private-owned lands, including agricultural and grazing lands. Such acquisitions will allow provision of recreational facilities in unserved communities and reduce deterioration of existing facilities.

- Rec-1.7 prioritizes the acquisition and development of trail segments in a manner to provide maximum environmental and public benefit given available public and private resources and the population served. As part of this effort, the County shall also maintain a database of information on the locations, status of easements, classifications, forms of access, management activities and land ownership relative to trail facilities. These efforts will allow for expanded trail facilities concurrent with increased demand.

- Rec-1.8 is the implementation, and revision as necessary, of the Regional Trails Plan as well as the Community Trails Master Plan. This will ensure that community goals, policies, and implementation criteria are defined for community trails. This measure also requires interjurisdictional coordination for the implementation of these plans.

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- Rec-1.9 requires that the County consult with the appropriate governing tribal council to facilitate the provision of trail connections through tribal land and/or Native American cultural resources. This expansion of trail facilities would minimize deterioration of existing facilities.

- Rec-1.10 requires the County to develop procedures that would coordinate the operation and maintenance of pathways with similar activities for adjacent roads and road rights-of-way. This would prevent deterioration of pathways.

- Rec-1.11 prioritizes open space acquisition needs through coordination with government agencies and private organizations. Once prioritized, the acquisition of open space lands will be facilitated through negotiation with private land owners and through MSCP regulatory requirements. The operation and management of such acquisitions will continue to be achieved by preparing, implementing, and updating Resource Management Plans and MSCP Area Specific Management Directives (ASMDs) for each open space area. This will result in the coordinated acquisition and maintenance of new land which will offset potential physical deterioration of existing facilities.

Cumulative Impact – Deterioration of Parks and Recreational Facilities: The cumulative projects in the San Diego region would have the potential to result in a significant cumulative impact if they would, in combination, result in the deterioration of parks and recreational facilities due to increased usage. The majority of cumulative recreational projects would undergo environmental review, and would be required to demonstrate compliance with CEQA and/or NEPA prior to project approval. Although the proposed Project may also increase demand for parks and recreational facilities outside the County's jurisdiction, including federally or state-owned facilities in the eastern County, the proposed Project is not anticipated to result in significant population growth in these areas. Some cumulative projects, such as buildout of general plans for adjacent jurisdictions, would have the potential to increase the demand for recreational facilities, which could result in deterioration of existing facilities. As a result, the proposed Project could contribute to a potentially significant cumulative impact from the deterioration of parks and recreational facilities. However, implementation of the General Plan Update policies and mitigation measures described above would mitigate the project's direct and cumulative impacts to below a level of significance.

A-25 **Significant Effect – Construction of New Recreational Facilities**: The FEIR identifies potentially significant impacts related to the inclusion of recreational facilities or the construction or expansion of recreational facilities which would have an adverse effect on the environment. This impact of the Project would be reduced to a less than significant level through implementation of identified General Plan policies and mitigation measures.

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Mitigation Measures: Rec-1.1, Rec-1.2, Rec-1.3, Rec-1.4, Rec-1.8, Rec-1.9, and Rec-2.1 through Rec-2.6

Facts in Support of Finding: The General Plan Update includes a number of recreational components. Although the Project does not specifically site or plan recreational facilities, it would allow for the development of parks, trails, athletic fields, and golf courses. The construction of new recreational facilities would have the potential to result in physical environmental effects.

The Project includes policies from the General Plan Land Use Element, Housing Element, Mobility Element, and Conservation and Open Space Element that address the construction or expansion of recreational facilities. The relevant policies are LU-6.4, LU-9.7, LU-18.2, M-12.5, M-12.9, M-12.10, H-2.2, COS-21.2, COS-21.3, COS-21.4, COS-23.1, and COS-23.3. These policies require residential subdivisions to reduce construction impacts to the environment, apply guidelines to maintain the unique character of a community, encourage the co-location of civic uses, guide the future development of trails in the unincorporated County to minimize environmental impacts and highlight existing natural resources, and require some projects to create common open space as a project amenity. Adherence to these policies would reduce the potential for construction and operation of new or expanded recreational facilities to have an adverse effect on the environment.

In addition, the Project includes mitigation measures which will mitigate potentially significant impacts to a less than significant level as follows:

- Rec-1.1 is the implementation of Board Policy I-44 to identify park and recreation needs and priorities for communities, and utilize the Community Plans when identifying park and recreation facility requirements. This will help ensure that additional facilities meet community needs.

- Rec-1.2 requires coordination with communities, agencies and organizations to identify, prioritize and develop park and recreation needs. This shall include pursuing partnership opportunities with school districts and other agencies to develop new park and recreation facilities; on-going support of the Park Advisory Committee and use of community center surveys to solicit input on park and recreation program and facility needs and issues; and continuing partnerships with other jurisdictions to share operation and maintenance costs for facilities via joint powers agreements.

- Rec-1.3 is a County design manual to provide concepts for park and recreation facility components. This will ensure that parks and recreation facilities are designed to be compatible with their surroundings and to meet community needs, thereby minimizing environmental impacts.

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- Rec-1.4 requires that residential projects with 50 or more units identify park facility needs and meet Subdivision Ordinance requirements for provision of trail and pathways shown on the Regional Trails Plan or Community Trails Master Plan. In addition, this measure requires the County to develop standards and design guidelines for large residential projects to include common open space amenities, such as tot lots, and the use of universal design features that accommodate both abled and disabled individuals. These steps will help ensure that impacts associated with recreational facilities are addressed early in project development.

- Rec-1.8 is the implementation, and revision as necessary, of the Regional Trails Plan as well as the Community Trails Master Plan. This will ensure that community goals, policies, and implementation criteria are defined for community trails. This measure also requires interjurisdictional coordination for the implementation of these plans.

- Rec-1.9 requires that the County consult with the appropriate governing tribal council to facilitate the provision of trail connections through tribal land and/or Native American cultural resources. This will help identify and avoid potential environmental impacts.

- Rec-2.1 requires the County to update Community Plans to reflect the character and vision for each individual community; to address civic needs in a community and encourage the co-location of uses; to establish and maintain greenbelts between communities; to prioritize infrastructure improvements and the provision of public facilities for villages and community cores; and to identify pedestrian routes. With these issues addressed in community plans, potential impacts to visual resources, community character, natural resources, cultural resources, and traffic will be substantially lessened should new or expanded recreational facilities be needed in a given community.

- Rec-2.2 requires the use of community design guidelines as a resource when designing park and recreation facilities. This will help ensure that such facilities are consistent with community character.

- Rec-2.3 is an amendment to the Subdivision Ordinance to require new residential development to be integrated with existing neighborhoods by providing connected and continuous road, environmentally-sensitive pathway/trail and recreation/open space networks. This amendment shall also include new conservation-oriented design guidelines for rural lands projects. This measure will assist in the planning for recreational facilities as new development is proposed while minimizing impacts to sensitive resources and community character.

- Rec-2.4 requires the County to develop procedures to consider designating trails that correspond to existing (non-designated) trails, paths, or unpaved roadbeds that

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already have a disturbed tread. This will minimize new impacts to the natural environment and will potentially benefit existing trail users.

- Rec-2.5 requires the County to monitor and manage preserves and trails through implementation of Resource Management Plans such that environmental resources do not become impacted as a result of soil erosion, flooding, fire hazard, or other environmental or man-made effects. Any impacts identified to environmental resources must be restored in accordance with the management directives within the Resource Management Plans.

- Rec-2.6 requires the County to develop procedures that encourage the involvement and input of the agricultural community in matters relating to trails on or adjacent to agricultural lands and place a priority on the protection of agriculture. This will help minimize potential impacts to agricultural resources from expanded recreational facilities.

Cumulative Impact – Construction of New Recreational Facilities: The cumulative projects in the San Diego region would have the potential to result in a significant cumulative impact if they would, in combination, require the construction or expansion of recreational facilities which would have an adverse effect on the environment. While the majority of cumulative projects would be required to demonstrate compliance with CEQA and/or NEPA prior to project approval, they would incrementally increase the need for new or expanded facilities, which would have the potential to result in adverse environmental effects. Therefore, cumulative projects would result in a significant cumulative impact associated with the construction of recreational facilities. However, implementation of the General Plan Update policies and mitigation measures described above would mitigate the project's direct and cumulative impacts to below a level of significance.

TRANSPORTATION AND TRAFFIC

A-26 **Significant Effect – Emergency Access**: The FEIR identifies potentially significant impacts related to inadequate emergency access. This impact of the Project would be reduced to a less than significant level through implementation of identified General Plan policies and mitigation measures.

Mitigation Measures: Tra-1.3, Tra-1.4, Tra-1.6, and Tra-4.1 through Tra-4.4

Facts in Support of Finding: Under the proposed Project, existing inadequate roadway widths, dead end roads, one-way roads, and gated communities, all of which have the potential to impair emergency access, can still occur. Private roads also have the potential to impair emergency access as they are often unpaved and poorly maintained, which poses risks to public safety, especially in high wildfire hazard areas.
Therefore, inadequate emergency access impacts could be significant.

The Project includes policies from the General Plan Land Use Element, Mobility Element, and Safety Element which would reduce the potential for inadequate emergency access. The relevant policies are: LU-2.8, LU-6.10, LU-12.2, M-1.2, M-3.3, M-4.4, S-3.4, S-3.5, and S-14.1. These policies require that development be located and designed to protect property and residents from the risks of natural and man-induced hazards, require development to mitigate significant impacts to existing service levels of public facilities or services for existing residents and businesses, provide for transportation facilities that can be adequately served by emergency services in the case of a transportation hazard, require that development provide multiple ingress/egress routes whenever feasible, require public and private roads to allow fire apparatus and emergency vehicle access while accommodating outgoing vehicles from evacuating residents, require development to be located near available fire and emergency service, and require development provide secondary access when necessary to ensure adequate fire safety. Adherence to these policies will reduce potential impacts associated with inadequate emergency access.

In addition, the Project includes mitigation measures which will mitigate potentially significant impacts to a less than significant level as follows:

- Tra-1.3 requires application of the County Public Road Standards during review of new development projects. In addition, the Public Road Standards shall be revised to include a range of road types according to Regional Category context. This will improve circulation and reduce the need for additional emergency access roads.

- Tra-1.4 requires the County to implement and revise as necessary the County Guidelines for Determining Significance for Transportation and Traffic to evaluate adverse environmental effects of projects and require mitigation when significant impacts are identified. This applies to the issue of emergency access as well as other transportation issues. Implementation of these thresholds will ensure that new development will mitigate or avoid impacts and can have the effect of improving existing conditions.

- Tra-1.6 is the preparation of project review procedures to require large commercial and office development to use Transportation Demand Management Programs to reduce single-occupant vehicle traffic generation and to prepare and forward annual reports to the County on the effectiveness of the program. This will maximize the capacity of road facilities and allow for improved responsiveness of emergency vehicles.

- Tra-4.1 requires the County to update Community Plans to identify local public road and community emergency evacuation route networks and pedestrian routes as appropriate. This will help identify and address areas that have inadequate emergency access.

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- Tra-4.2 is the implementation of Building and Fire Codes to ensure there are adequate service levels in place associated with the construction of structures and their accessibility and egress.

- Tra-4.3 requires the County to implement and revise as necessary the County Guidelines for Determining Significance for Wildland Fire and Fire Protection to evaluate adverse environmental effects of projects. Fire protection plans shall also be required to ensure the County Fire Code and other applicable regulations are being met.

- Tra-4.4 requires the County to implement and revise as necessary the Subdivision Ordinance to ensure that proposed subdivisions meet current design and accessibility standards. This would ensure that new subdivision projects have adequate emergency access.

Cumulative Impact – Emergency Access: The area of analysis for cumulative emergency access impacts includes the County of San Diego and surrounding jurisdictions. Cumulative projects in this area would encounter similar emergency access impairment issues as the General Plan Update. Existing conditions in these jurisdictions include inadequate roadway widths, dead end roads, one-way roads, and gated communities, have the potential to impair emergency access. However, cumulative emergency access impacts would be limited to the immediate vicinity of the impact, such as multiple obstructions to emergency access along the same route to an emergency care facility hospital. In addition, most cumulative projects which propose the construction of new roadways would be required to meet current State and applicable jurisdictional standards, in addition to CEQA requirements. Community plans would also be required to consider local public and fire access roads to fully address emergency access requirements. Therefore, cumulative project impacts would be considered less than significant because emergency access impacts would be limited to the immediate vicinity of a project area and associated impacts would be considered direct, not cumulative. The Project would not contribute to a significant cumulative impact associated with emergency access.

A-27 **Significant Effect – Parking Capacity**: The FEIR identifies potentially significant impacts related to inadequate parking capacity. This impact of the Project would be reduced to a less than significant level through implementation of identified General Plan policies and mitigation measures.

Mitigation Measures: Tra-1.4, Tra-5.1, Tra-5.2, and Tra-5.3

Facts in Support of Finding: Almost all land uses under the proposed Project would require parking facilities when developed. The regulations are intended to require projects to provide adequate off-street parking and loading, thereby reducing traffic

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congestion, allowing more efficient utilization of on-street parking, promoting more efficient loading operations, and reducing the use of public streets for loading purposes.

The Project includes policies from the General Plan Mobility Element which would reduce the potential for inadequate parking capacity. The relevant policies are: M-8.6, M-9.3, M-9.4, and M-10.1 through M-10.4. These policies improve regional opportunities for park-and-ride facilities, encourage preferred parking, require park-and-ride facilities in certain land uses and development, set standards for parking capacity and design, provide for sufficient parking capacity for motor vehicles consistent with development and use type, and require development to maximize on-street parking and minimize parking where it is not needed. Adherence to these policies will reduce the potential for inadequate parking capacity.

In addition, the Project includes mitigation measures which will mitigate potentially significant impacts to a less than significant level as follows:

- Tra-1.4 requires the County to implement and revise as necessary the County Guidelines for Determining Significance for Transportation and Traffic to evaluate adverse environmental effects of projects and require mitigation when significant impacts are identified. This applies to the issue of parking capacity as well as other transportation issues.

- Tra-5.1 requires the County to review and revise parking regulations in the Zoning Ordinance for senior housing and affordable housing, utilizing data from studies conducted for these groups. By using research that identifies the specific transportation and parking needs for these housing types, the County can maximize parking capacity where it is in highest demand and minimize parking where it is not needed.

- Tra-5.2 is the preparation of town center plans for village areas that incorporate shared parking facilities and include in Community Plans or other appropriate documents. This will further ensure that there is sufficient parking capacity in areas of high density.

- Tra-5.3 is the revision of the Public Road Standards to include standards for the provision of parallel and diagonal on-street parking, according to Regional Category. This measure will ensure that additional parking capacity is provided on public roads with increased traffic.

Cumulative Impact – Parking Capacity: The area of analysis for cumulative parking capacity includes the County of San Diego and the immediate vicinity of land uses requiring parking, including those located in surrounding jurisdictions. Cumulative projects in this area would face similar parking capacity issues as the Project. Many jurisdictions surrounding the unincorporated County are densely populated, especially in

the western portion of the unincorporated County. Therefore, the potential exists that existing and proposed high density land uses, designated under surrounding jurisdictions general plans, would not be able to supply adequate parking facilities, due to area constraints. However, cumulative parking impacts would be limited to the immediate vicinity of the impact, such as a specific urban development project. In addition, most future cumulative projects would be required to comply with existing regulations pertaining to parking facilities, such as jurisdictional parking, zoning and road standards. Therefore, cumulative projects would not result in a significant cumulative impact because impacts associated with parking would be limited to the immediate vicinity of a project area and associated impacts would be considered direct, not cumulative. The Project would not contribute to a significant cumulative impact associated with parking capacity.

A-28 **Significant Effect – Alternative Transportation**: The FEIR identifies potentially significant impacts related to conflicts with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks). This impact of the Project would be reduced to a less than significant level through implementation of identified General Plan policies and mitigation measures.

Mitigation Measures: Tra-5.1, Tra-5.2, and Tra-6.1 through Tra-6.9

Facts in Support of Finding: While existing County policies and regulations and 2011 General Plan goals and policies are intended to promote alternative transportation plans and policies, implementation of the proposed Project would require coordination between the County and the agencies responsible for public transportation planning, including the San Diego Association of Governments (SANDAG), Caltrans, transit agencies, and adjacent jurisdictions. Therefore, the proposed Project is concluded to result in a potentially significant direct impact to alternative transportation plans and policies.

The Project contains goals and policies from the General Plan Land Use Element and Mobility Element that address alternative transportation. The relevant policies are: LU-5.1, LU-5.4, LU-5.5, LU-9.8, LU-11.6, M-3.1, M-3.2, M-4.3, M-8.1, M-8.2, M-8.3, M-8.4, M-8.5, M-8.6, M-8.7, , M-9.2, M-9.4, and M-11.1 through M-11.7. The policies in the Land Use Element reduce vehicle trips within communities, promote infill and redevelopment, prohibit projects that impede bicycle or walking access, require development within villages to include pedestrian routes, and direct new office development to be located in areas where public transit and vehicular linkages exist. Within the Mobility Element, these policies require development projects to contribute their fair share toward financing transportation facilities, encourage development that accommodates alternative transportation, require incorporation of alternative modes of transportation in new development, encourage rural roads that safely accommodate multiple types of transportation, promote transit service for transit-dependent populations, provide for transit service to key community facilities and services, provide

for transit stops that facilitate ridership, require transit stops to provide amenities, require and improve transit and park-and-ride facilities, improve inter-regional travel modes, require coordination with large employers to provide shuttles and other means of transportation, facilitate transportation demand management, provide for new and expanded pedestrian and bicycle networks, and improve funding and coordination for bicycle and pedestrian facilities. Adherence to these policies will minimize potential conflicts with programs supporting alternative transportation.

In addition, the Project includes mitigation measures which will mitigate potentially significant impacts a less than significant level as follows:

- Tra-5.1 requires the County to review and revise parking regulations in the Zoning Ordinance for senior housing and affordable housing, utilizing data from studies conducted for these groups. By using research that identifies the specific transportation and parking needs for these housing types and updating the Zoning Ordinance accordingly, the County can maximize opportunities for alternative transportation facilities and ensure consistency with adopted policies, plans, and programs that address alternative transportation.

- Tra-5.2 is the preparation of town center plans for village areas that incorporate shared parking facilities and include in Community Plans or other appropriate documents. This will help identify alternative transportation needs in high density areas.

- Tra-6.1 requires the County to establish policies and design guidelines within community plans that encourage commercial centers in compact walkable configurations and discourage “strip” commercial development. These types of design standards can reduce vehicle trips and promote access to services via alternative modes of transportation such as walking or bicycling.

- Tra-6.2 requires the County to establish comprehensive planning principles for transit nodes such as the SPRINTER Station located in North County Metro. This measure will allow for greater consistency between the County General Plan and plans addressing alternative transportation such as mass transit.

- Tra-6.3 requires the County to locate County facilities near transit facilities, whenever feasible. Implementation of this measure will facilitate use of alternative transportation among County employees as well as among people needing County services.

- Tra-6.4 is the coordination with SANDAG, Caltrans, and tribal governments to maximize opportunities to locate park and ride facilities. This will enhance alternative transportation opportunities for County residents in areas where it would substantially reduce vehicle miles traveled.

- Tra-6.5 is the coordination with SANDAG, Caltrans, and transit agencies to expand the mass transit opportunities in the unincorporated county and to review the location and design of transit stops. This measure also requires the County to establish a Department of Planning and Land Use transit coordinator to ensure land use issues are being addressed. This coordination will further ensure consistency between County land use decisions and adopted policies, plans and programs that support alternative transportation.

- Tra-6.6 requires the County to review the improvement plans for railroad facilities in the unincorporated County. This will further correlate rail planning with land use planning.

- Tra-6.7 requires the County to implement and revise the County Bicycle Transportation Plan every five years, or as necessary, to identify a long range County bicycle network and qualify for State or other funding sources. This also includes coordination with the County Trails Program. By regularly updating the Bicycle Transportation Plan, the County will be able promote alternative transportation while ensuring that conflicts do not occur between adopted land use plans and transportation plans/programs.

- Tra-6.8 is the coordination with SANDAG in the development of a Regional Bicycle Plan to ensure consistency with County transportation plans. This also includes coordination with the County Trails Program. This coordination will prevent potential conflicts between land use plans and the Regional Bicycle Plan, as well as ensuring consistency with the County Trails Program which supports multiple types of alternative transportation.

- Tra-6.9 requires the County to implement and revise as necessary the County Trails Program (CTP) for trail development and management. In addition, the County must implement and revise as necessary the Community Trails Master Plan (CTMP), which incorporates adopted individual community trail and pathway plans, based on community goals, policies, and implementation criteria. This will ensure that the County continues to support and expand upon alternative transportation opportunities through the CTP and CTMP consistent with implementation of the General Plan Update.

Cumulative Impact – Alternative Transportation: The area of analysis for cumulative alternative transportation impacts includes the County of San Diego and immediately surrounding jurisdictions. Cumulative projects in these areas include projects consistent with surrounding jurisdictions' general plans and regional roadway plans. Similar to the General Plan Update, cumulative projects would potentially impair existing alternative transportation plans, policies, or programs. Additionally, if cumulative projects in surrounding jurisdictions are not effectively communicated and planned with agencies

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managing alternative transportation in region, conflicts would occur. However, most cumulative projects would be required to comply with existing federal, State, and local regulations, and any applicable Community plans or jurisdictional standards, such as a zoning ordinance. Implementation of the General Plan Update policies and mitigation measures described above would mitigate the project's direct and cumulative impacts to below a level of significance. Therefore, the Project would not contribute to a significant cumulative impact associated with alternative transportation.

UTILITIES AND SERVICE SYSTEMS

A-29 **Significant Effect – Wastewater Treatment Requirements**: The FEIR identifies potentially significant impacts related to exceedance of wastewater treatment requirements of the Regional Water Quality Control Board (RWQCB). This impact of the Project would be reduced to a less than significant level through implementation of identified General Plan policies and mitigation measures.

Mitigation Measures: USS-1.1 through USS-1.3

Facts in Support of Finding: The demand for wastewater treatment capacity would potentially increase upon implementation of the proposed Project. An increase in wastewater demand would require the need for new or expanded facilities to be constructed. In order to be permitted, new facilities would be required to meet the wastewater treatment requirements for the RWQCB. Yet, if the demand increased at a rate disproportionate to capabilities of wastewater treatment facilities, a violation in wastewater treatment standards could occur.

The Project includes policies from the General Plan Land Use Element that address wastewater treatment requirements. The relevant policies are LU-9.4, LU-12.1, LU-12.2, and LU-14.1 through LU-14.4. These policies prioritize infrastructure improvements and provision of public facilities in community cores and require concurrency of infrastructure and services with development as well as maintenance of adequate services with development. These policies also require adequate wastewater facility plans, disposal, treatment facilities, and sewer facilities. Adherence to these policies will reduce impacts associated with exceedance of RWQCB wastewater treatment requirements.

In addition, the Project includes mitigation measures which will mitigate potentially significant impacts to a less than significant level as follows:

- USS-1.1 requires interjurisdictional reviews to gather information on and review and provide comments on plans of incorporated jurisdictions and public agencies in the region. This will help ensure that wastewater treatment needs are identified and planned to be proportionate to the provision of adequate facilities.

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- USS-1.2 requires the County to implement and revise as necessary Board Policy I-84 to ensure adequate availability of sewer /sanitation service for development projects that require it. This measure also includes revision to Board Policy I-78 to include additional criteria and regulatory requirements restricting the location of small wastewater treatment facilities. This will help ensure that demand for wastewater treatment does not exceed capacity.

- USS-1.3 requires County planning staff participation in the review of wastewater facility long range and capital improvement plans. This measure will ensure that the County is meeting RWQCB requirements and that infrastructure is being planned concurrent with development.

Cumulative Impact – Wastewater Treatment Requirements: Cumulative projects within the region, such as those proposed under adjacent city and county general plans or on tribal land, would result in an increase in residential, commercial and industrial development that would require wastewater treatment services. Similar to the General Plan Update, an increase in wastewater treatment demand that is disproportionate to wastewater treatment capabilities would result in a violation of the treatment requirements. However, compliance with regulations and CEQA would reduce cumulative impacts related to potential wastewater treatment violations to below a significant level and a significant cumulative impact would not occur. For these same reasons, implementation of the project, in combination with the identified cumulative projects, would not result in a significant cumulative impact.

A-30 **Significant Effect – New Water or Wastewater Treatment Facilities**: The FEIR identifies potentially significant impacts associated with new water or wastewater treatment facilities or the expansion of existing facilities, the construction of which could cause significant environmental effects. This impact of the Project would be reduced to a less than significant level through implementation of identified General Plan policies and mitigation measures.

Mitigation Measures: USS-2.1 through USS-2.3

Facts in Support of Finding: Build-out of the General Plan Update would result in the construction of residential, commercial and industrial structures, which would result in an increased need for water and wastewater treatment services. In order to meet the increased demand, new and expanded water and wastewater treatment facilities would need to be constructed. The construction of new or expanded water and/or wastewater facilities would have the potential to cause secondary environmental effects to air quality, cultural resources, noise, hydrology or other environmental issues.

The Project includes policies from the General Plan Land Use Element and Housing Element that address water and wastewater treatment facilities. The relevant policies are LU-1.2, LU-4.3, and H-1.3. These policies prohibit leapfrog development that would

require the construction of new infrastructure facilities, require consideration of the relationship of plans in adjoining jurisdictions, and encourage housing near public infrastructure which would reduce the need for new infrastructure that could have significant effects on the environment. Adherence to these policies will reduce impacts associated with new or expanded water and/or wastewater treatment facilities.

In addition, the Project includes mitigation measures which will mitigate potentially significant impacts to a less than significant level as follows:

- USS-2.1 requires the County to revise Board Policy I-63 to minimize leapfrog development and to establish specific criteria for GPAs proposing expansion of areas designated village regional category. This is intended to limit unexpected demands for new water and wastewater facilities.

- USS-2.2 requires the County to conduct CEQA review on privately initiated water and wastewater facilities and review and comment on water and wastewater projects undertaken by other public agencies to ensure that impacts are minimized and that projects are in conformance with County plans. This will ensure that environmental effects associated with new or expanded facilities are adequately analyzed and mitigated.

- USS-2.3 requires the County to implement, and revise as necessary, the Green Building Program to encourage project designs that incorporate water conservation measures, thereby reducing the potential demand for new water purveyors with the buildout of General Plan Update. This will, in turn, minimize future environmental impacts that would result from new or expanded facilities.

Cumulative Impact – New Water and Wastewater Treatment Facilities: Cumulative projects would result in an increase in residential, commercial and industrial development that would increase the demand for water and wastewater treatment services. An increase in the demand for these services has the potential to require or result in the construction of new water or wastewater treatment facilities or the expansion of existing facilities, the construction of which would cause significant environmental effects. Most future water treatment or wastewater treatment projects would be required to comply with some or all of the following regulations which would also reduce the potential for cumulative impacts: Safe Drinking Water Act, Federal Water Pollution Control Act, California Water Code, California Drinking Water Standards, Porter-Cologne Water Quality Control Act, Water Conservation Projects Act, County of San Diego Uniform Sewer Ordinance, County Code 68.101, County Fee Ordinances, and Board of Supervisors Policies, and to conduct environmental review pursuant to CEQA or NEPA. To the extent feasible, significant environmental impacts would be mitigated to below a level of significant, consistent with CEQA or NEPA. As such, cumulative impacts associated with the development of water and wastewater facilities from cumulative projects would not be significant. Therefore, implementation of the

Project, in combination with the identified cumulative projects, would not result in a significant cumulative impact.

A-31 **Significant Effect – Sufficient Stormwater Drainage Facilities**: The FEIR identifies potentially significant impacts related to new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. This impact of the Project would be reduced to a less than significant level through implementation of identified General Plan policies and mitigation measures.

Mitigation Measures: USS-3.1 through USS-3.5

Facts in Support of Finding: Build-out of the Project would result in an increase in impervious surfaces, which would result in increased stormwater runoff. Such an increase would likely exceed the capacity of existing stormwater drainage systems, requiring the construction of new or expanded facilities. The construction of new or expanded stormwater drainage facilities would have the potential to cause secondary environmental effects to agriculture, biology, cultural resources, noise, or other environmental issues.

The Project includes policies from the General Plan Land Use Element and the Conservation and Open Space Element that address stormwater drainage facilities. The relevant policies are LU-6.5, LU-6.9, and COS-4.3. These policies require sustainable stormwater management and development conformance with topography and require that stormwater filtration development utilize natural drainage patterns in order to reduce environmental impacts from the alteration of existing drainage patterns or construction of new drainage facilities. Adherence to these policies will reduce impacts associated with new or expanded stormwater drainage facilities.

In addition, the Project includes mitigation measures which will mitigate potentially significant impacts to a less than significant level as follows:

- USS-3.1 would result in an amendment of the Subdivision Ordinance to include additional design requirements for subdivisions that encourage conservation oriented design. The amendment would also include regulations that require new residential development to be integrated with existing neighborhoods by providing connected and continuous road, pathway/trail and recreation/open space networks. This will reduce scattered development footprints and increase pervious surfaces in site design, thereby minimizing the need for new stormwater drainage facilities.

- USS-3.2 is the preparation of Subdivision Design Guidelines that establish a process to identify significant resources on a project site, identify the best areas or development and create a conservation oriented design for both the project and open space areas. This will minimize the need for new or expanded stormwater facilities and will minimize impacts if such facilities are included in a project.

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- USS-3.3 requires use of the County Guidelines for Determining Significance for Surface Water Quality and Hydrology to identify adverse environmental effects on water quality. These guidelines provide measures for reducing stormwater runoff.

- USS-3.4 requires the County to implement the LID handbook and establish LID standards for new development to minimize runoff and maximize infiltration.

- USS-3.5 requires the County to evaluate the environmental effects of all proposed stormwater drainage facilities and ensure that significant adverse effects are minimized and mitigated.

Cumulative Impact – Sufficient Stormwater Drainage Facilities: Cumulative projects would result in an increase in impervious surfaces from development which would increase stormwater runoff volumes. To effectively manage the increased runoff, the construction of new stormwater drainage facilities or the expansion of existing facilities would be required, the construction of which would have the potential to result in significant environmental effects. Most future stormwater drainage facilities would be required to comply with some or all of the following regulations which would also reduce the potential for cumulative impacts: Federal Water Pollution Control Act, California Water Code, and Porter-Cologne Water Quality Control Act, and to conduct environmental review pursuant to CEQA or NEPA. To the extent feasible, significant environmental impacts would be mitigated to below a level of significant. As such, impacts associated with the construction of new stormwater drainage facilities from cumulative projects would not be significant. Therefore, the Project, in combination with the identified cumulative projects, would not result in a significant cumulative impact.

A-32 **Significant Effect – Adequate Wastewater Facilities**: The FEIR identifies potentially significant impacts associated with the determination by the wastewater provider which serves or may serve the Project area that it has inadequate capacity to service the Project's projected demand in addition to the provider's existing commitments. This impact of the Project would be reduced to a less than significant level through implementation of identified General Plan policies and mitigation measures.

Mitigation Measures: USS-1.1 through USS-1.3

Facts in Support of Finding: Under the Project, some wastewater service providers would require upgrades or have inadequate capacity to serve projected growth within the County.

The Project includes a policy from the General Plan Land Use Element which would reduce the potential for development with inadequate wastewater capacity. The relevant policy is: LU-4.3 Relationship of Plans in Adjoining Jurisdictions. This policy requires the County to consider the plans and projects of overlapping or neighboring agencies in the

planning of unincorporated lands, and to invite comments and coordination when appropriate. Adherence to this policy will reduce impacts associated with wastewater facilities.

In addition, the Project includes mitigation measures which will mitigate potentially significant impacts to a less than significant level as follows:

- USS-1.1 requires interjurisdictional reviews to gather information on and review and provide comments on plans of incorporated jurisdictions and public agencies in the region. This will help ensure that wastewater treatment needs are identified and planned to be proportionate to the provision of adequate facilities.

- USS-1.2 requires the County to implement and revise as necessary Board Policy I-84 to ensure adequate availability of sewer /sanitation service for development projects that require it. This measure also includes revision to Board Policy I-78 to include additional criteria and regulatory requirements restricting the location of small wastewater treatment facilities. This will help ensure that demand for wastewater treatment does not exceed capacity.

- USS-1.3 requires County planning staff participation in the review of wastewater facility long range and capital improvement plans. This measure will ensure that the County is meeting RWQCB requirements and that infrastructure is being planned concurrent with development.

Cumulative Impact – Adequate Wastewater Facilities: Cumulative projects would have the potential to increase demand for wastewater facilities to the point that the wastewater provider has inadequate capacity to serve the projected demand, in addition to the provider's existing commitments. Therefore, cumulative projects would require new facilities, the construction of which could have significant environmental impacts. However, most development of new facilities would be required to comply with some or all of the following regulations which would also reduce the potential for cumulative impacts: Federal Water Pollution Control Act, Porter-Cologne Water Quality Control Act, and County of San Diego Uniform Sewer Ordinance, and would be subject to CEQA or NEPA review and would be required to mitigate environmental impacts to below a level of significance, to the extent feasible. Therefore, a significant cumulative impact would not occur. The General Plan Update, in combination with the identified cumulative projects, would not contribute to a significant cumulative impact.

A-33 **Significant Effect – Energy**: The FEIR identifies potentially significant impacts related to the construction of new energy production and/or transmission facilities or expansion of existing facilities, the construction of which would cause significant environmental effects. The increase in energy demand would affect energy facilities located within the unincorporated county as well as energy facilities that serve unincorporated areas but are located outside the county. In addition, regional energy projects that will be

constructed within the region to meet future energy demands have been identified in the General Plan Update PEIR and also in the Project Description, subsection 1.9.1.5 (Regional Energy and Utility Projects) of this FCI Lands GPA SEIR. These projects include new energy production facilities, transmission facilities, or expansion of existing facilities. This impact of the Project would be reduced to a less than significant level through implementation of identified General Plan policies and mitigation measures.

Mitigation Measures: USS-8.1 through USS-8.3

Facts in Support of Finding: Build-out of the Project would require energy facilities to be constructed or expanded, which would have the potential to result in significant environmental effects.

The Project includes policies in the Conservation and Open Space Element that address energy use and energy facilities. The relevant policies are COS-14.7, and COS-15.1 through COS-15.5. These policies encourage alternative energy sources, energy efficiency, green building programs, and energy recovery for development. Adherence to these policies will reduce impacts associated with new or expanded energy facilities.

In addition, the Project includes mitigation measures which will mitigate potentially significant impacts to a less than significant level as follows:

- USS-8.1 requires the County to implement, and revise as necessary, the County Green Building Program through incentives for development that is energy efficient and conserves resources. This will reduce the need for new or expanded energy facilities.

- USS-8.2 is the revision of Board Policy F-50 to strengthen the County's commitment and requirement to implement resource-efficient design and operations for County funded renovation and new building projects. This also includes revision of Board Policy G-15 to require County facilities to comply with Leadership in Energy and Environmental Design (LEED) standards or other Green Building rating systems. This will reduce energy usage for government operations and further minimize the need for additional energy facilities.

- USS-8.3 is the revision of Board Policy G-16 to require the County to adhere to the same or higher standards it would require from the private sector when locating and designing facilities concerning environmental issues and sustainability. The revision to the policy would also require government contractors to use low emission construction vehicles and equipment. This will reduce energy usage for government operations and further minimize the need for additional energy facilities.

Cumulative Impact – Energy: Multiple cumulative projects relating to energy are considered in the analysis: the California Energy Commission has identified energy

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projects within the region that will be constructed to meet future energy demands; the Wide-west Energy Corridor project would establish electric and multi-modal transmission corridors within Bureau of Land Management and National Forest Service lands in San Diego and surrounding counties; the Sunrise Powerlink Transmission Project would be constructed to meet the energy demands of the region; and both SDG&E and Southern California Edison have procurement plans that identify energy projects to be constructed in the future. Cumulative projects would result in the construction of new energy production facilities, transmission facilities, or expansion of existing facilities. Any future energy project would be required to conduct environmental review pursuant to CEQA or NEPA prior to approval. Identified significant environmental impacts would be mitigated to below a level of significance, to the extent feasible. However, due to the large scale nature of these projects, it is reasonably foreseeable that the construction of these facilities would cause significant and unavoidable environmental impacts, such as those associated with air quality, aesthetics, noise, or climate change, that in combination with other cumulative projects would result in a significant cumulative impact. Additionally, the General Plan Update would result in a cumulatively considerable contribution to significant cumulative impact. However, implementation of the General Plan policies and mitigation measures, in addition to the California Energy Efficiency Standards for residential and non-residential buildings, would reduce direct and cumulative impacts related to the need for the expansion or construction of energy facilities to a level below significance.

Section B – Finding (2)

Pursuant to Section 15091(a)(2) of the State CEQA Guidelines, the County Board of Supervisors finds that, for each of the following significant effects as identified in the FEIR, changes or alterations which would avoid or substantially lessen these significant effects are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency. The significant effects (Impacts) and Mitigation Measures are stated fully in the FEIR. The following are brief explanations of the rationale for this finding for each Impact:

BIOLOGICAL RESOURCES

B-1 **Significant Effect – Special Status Species**: The FEIR identifies significant impacts, either directly or through habitat modifications, on species identified as candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the CDFG or USFWS.

Mitigation Measures: The mitigation measures identified in the FEIR partially mitigate the significant impact as follows:

- Bio-1.1 is the preparation of a Conservation Subdivision Program that facilitates conservation-oriented project design through changes to the Subdivision Ordinance, Resource Protection Ordinance, Zoning Ordinance, and Groundwater Ordinance. This program will promote conservation of natural resources and open space while improving mechanisms for flexibility in project design so that production of housing stock is not negatively impacted. Additionally, any such allowances of flexibility must be done with consideration of community character through planning group coordination and/or findings required for project approval.

- Bio-1.2 requires the County to implement and revise existing Habitat Conservation Plans/Policies to preserve sensitive resources within a cohesive system of open space; and to continue preparation of Multiple Species Conservation Program (MSCP) Plans for North County and East County. Implementation of the existing South County MSCP has been very effective in preserving candidate species and their habitat as intended; and this measure will ensure that this success is continued and carried forward to future MSCP efforts.

- Bio-1.3 requires the County to implement conservation agreements through Board Policy I-123, as this will facilitate preservation of high-value habitat in the County's MSCP Subarea Plan. This measure will benefit sensitive species by preserving sizeable areas of habitat in the unincorporated County.

- Bio-1.4 requires the County to coordinate with nonprofit groups and other agencies to acquire preserve lands. This measure will help continue the County's success with acquiring large areas of open space that are utilized by resident and migratory special status species throughout the region.

- Bio-1.5 directs the County to utilize County Guidelines for Determining Significance for Biological Resources to identify adverse impacts to biological resources, and to utilize the County's Geographic Information System (GIS) records and the Comprehensive Matrix of Sensitive Species to locate special status species populations on or near project sites. This information will be used to avoid or mitigate potential project impacts in the County as appropriate.

- Bio-1.6 is the implementation of the Resource Protection Ordinance (RPO), the Biological Mitigation Ordinance (BMO), and the Habitat Loss Permit (HLP) Ordinance to protect wetlands, wetland buffers, sensitive habitat lands, biological resource core areas, linkages, corridors, high-value habitat areas, subregional coastal sage scrub focus areas, and populations of rare, or endangered plant or animal species. These ordinances are part of the County regulatory code and explicitly mandate preservation of sensitive biological resources.

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- Bio-1.7 requires the County to minimize edge effects from development projects located near sensitive resources by implementing the County Noise Ordinance, the County Groundwater Ordinance, the County's Landscaping Regulations (currently part of the Zoning Ordinance), and the County Watershed Protection, Storm Water Management, and Discharge Control Ordinance. Implementation of these ordinances reduces potential indirect impacts to special status species and their habitats.

The Project also includes policies from the General Plan Conservation and Open Space Element and the Land Use Element that address special status species and their habitats. The relevant policies are: COS-1.3, COS-1.6 through COS-1.11, COS-2.1, COS-2.2, LU-6.1, LU-6.2, LU-6.3, LU-6.4, LU-6.6, LU-6.7, and LU-10.2. These policies require monitoring, management and maintenance of a regional preserve system, facilitate preserve assembly and funding, help minimize edge effects, facilitate preparation of habitat conservation plans and resource management plans, direct development to avoid and/or preserve habitat, provide for long-term sustainability of the natural environment, and encourage contiguous open space areas that protect wildlife habitat and corridors. Adherence to these policies will further reduce impacts to special status species from future development.

Facts in Support of Finding: The Project would have the potential to result in direct and/or indirect impacts to special status plant and wildlife species and their habitat from the development of land uses proposed under this alternative. As shown in Draft Final SEIR, Volume I, Table 4.2-1, the Project could result in 12,528 acres of direct impacts to habitats that would have the potential to support special status plant and wildlife species. General Plan Update policies and mitigation measures would reduce impacts to special status species, but not to below a level of significance.

The following measure was also considered to reduce impacts to special status species to below significant. However, the County has determined that this measure would be infeasible, as described below. Therefore, the following mitigation measure will not be implemented.

(1) Measure: Adopt MSCP Plans for North County and East County that provide coverage for special status species as well as protections for wildlife corridors, habitat linkages, and core habitat areas in those regions.

Rationale for Rejection: This measure is feasible and attainable as the County is currently in the process of preparing such plans. However, these conservation plans require approval at the federal and State levels, which the County cannot be assured of. In addition, the timing of these programs (i.e., MSCP adoption and implementation) may not coincide with General Plan Update impacts in these areas. While MSCP Plans or similar programs can be implemented without concurrence from other agencies, some of the primary benefits associated with these Habitat Conservation Plans (HCPs) and Natural Community Conservation Planning (NCCP)

programs would be lost by doing so. This is because HCPs/NCCPs allow for take of specified federal and state listed species. These "take permits" benefit private landowners in the County as well as numerous public projects which could not be accomplished without a comprehensive conservation plan that addresses multiple species. Given the costs associated with such plans, as well as the public support needed to get them approved and implemented, it is not feasible to adopt MSCP or similar plans for North County and East County without achieving the maximum benefit possible for the public. Therefore, to implement similar plans that would effectively mitigate General Plan Update impacts to special status species in North County and East County to a level below significance without the included assurances from federal and State permitting agencies would not be feasible for economic and political reasons.

None of the Project alternatives would reduce impacts associated with special status species to below significant. While the Environmentally Superior alternative would further reduce the impacts to special status species, this alternative still allows development that would result in impacts that are not mitigated to a level below significant without adopting the measure noted above. In addition, this alternative would not meet the Project objective of recognizing community and stakeholder interests while striving for consensus.

Conclusion: Because the measure listed above has been found to be infeasible; because application of all feasible mitigation and project design measures would not achieve a level of less than significant; and because there are no feasible project alternatives that would achieve a level of less than significant; impacts to special status species would remain significant and unavoidable.

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Cumulative Impact – Special Status Species: As described above, implementation of the proposed General Plan Update would have the potential to impact, either directly or through habitat modifications, species identified as candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the CDFG or USFWS. In combination with other cumulative projects, the General Plan Update would have the potential to result in a significant cumulative impact.

Facts in Support of Finding: Cumulative projects located in the San Diego region would have the potential to result in impacts to special status plant and wildlife species, including loss of habitat. Without a comprehensive NCCP in place for the long-term protection of special status plant and wildlife species for the entire southern California region, a cumulative loss of habitat supporting special status plant and wildlife species would occur, even after mitigation has been implemented for individual projects. Therefore, a significant cumulative impact associated with special status plant and wildlife species would occur.

General Plan Update policies and mitigation measures would reduce cumulative impacts to special status species, but not to below a level of significance. The County has adopted an MSCP South County Subarea Plan for the southwestern portion of the County, but is still developing MSCP Plans for North County and East County areas. Therefore, until the County has adopted the North County and East County Plans with concurrence from State and federal agencies, the Project's contribution, in combination with other cumulative projects, would be cumulatively considerable.

B-2 **Significant Effect – Riparian Habitat and Other Sensitive Natural Communities**: The FEIR identifies significant impacts on riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by CDFG or USFWS.

Mitigation Measures: The mitigation measures identified in the FEIR partially mitigate the significant impact as follows:

- Bio-1.1 is the preparation of a Conservation Subdivision Program that facilitates conservation-oriented project design through changes to the Subdivision Ordinance, Resource Protection Ordinance, Zoning Ordinance, and Groundwater Ordinance. This program will promote conservation of natural resources and open space while improving mechanisms for flexibility in project design so that production of housing stock is not negatively impacted. Additionally, any such allowances of flexibility must be done with consideration of community character through planning group coordination and/or findings required for project approval.

- Bio-1.2 requires the County to implement and revise existing Habitat Conservation Plans/Policies to preserve sensitive resources within a cohesive system of open space; and to continue preparation of Multiple Species Conservation Program (MSCP) Plans for North County and East County. Implementation of the existing South County MSCP has been very effective in preserving riparian habitat and other sensitive natural communities; and this measure will ensure that this success is continued and carried forward to future MSCP efforts.

- Bio-1.3 requires the County to implement conservation agreements through Board Policy I-123, as this will facilitate preservation of high-value habitat in the County's MSCP Subarea Plan. This measure preserves riparian habitat and other sensitive natural communities in the unincorporated County.

- Bio-1.4 requires the County to coordinate with nonprofit groups and other agencies to acquire preserve lands. This measure will help continue the County's success with acquiring large areas of open space that contain riparian habitat and other sensitive natural communities throughout the region.

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- Bio-1.5 directs the County to utilize County Guidelines for Determining Significance for Biological Resources to identify adverse impacts to biological resources, and to utilize the County's Geographic Information System (GIS) records and the Comprehensive Matrix of Sensitive Species to locate special status species populations on or near project sites. This information will be used to avoid or mitigate potential project impacts to sensitive habitats in the County as appropriate.

- Bio-1.6 is the implementation of the Resource Protection Ordinance (RPO), the Biological Mitigation Ordinance (BMO), and the Habitat Loss Permit (HLP) Ordinance to protect wetlands, wetland buffers, sensitive habitat lands, biological resource core areas, linkages, corridors, high-value habitat areas, subregional coastal sage scrub focus areas, and populations of rare, or endangered plant or animal species. These ordinances are part of the County regulatory code and explicitly mandate preservation of sensitive biological resources.

- Bio-1.7 requires the County to minimize edge effects from development projects located near sensitive resources by implementing the County Noise Ordinance, the County Groundwater Ordinance, the County's Landscaping Regulations (currently part of the Zoning Ordinance), and the County Watershed Protection, Storm Water Management, and Discharge Control Ordinance. Implementation of these ordinances reduces potential indirect impacts to riparian habitat and other sensitive natural communities.

- Bio-2.1 requires the County to revise the Ordinance Relating to Water Conservation for Landscaping to incorporate appropriate plant types and regulations requiring planting of native or compatible non-native, non-invasive plant species in new development. For applicable projects subject to this ordinance, this measure will prevent indirect impacts to riparian habitat and other sensitive natural communities associated with invasive plant species.

- Bio-2.2 is the requirement that development projects obtain Clean Water Act (CWA) Section 401/404 permits issued by the California Regional Water Quality Control Board and U.S. Army Corps of Engineers for all project-related disturbances of waters of the U.S. and/or associated wetlands. It further requires that projects obtain Fish and Game Code Section 1602 Streambed Alteration Agreements from the California Department of Fish and Game for all project-related disturbances of streambeds. By identifying the need for these permits, the County can ensure that applicable mitigating measures required or requested by these agencies can be included for such projects.

- Bio-2.3 is the requirement that wetlands and wetland buffer areas are adequately preserved whenever feasible to maintain biological functions and values. While this preservation requirement is applied to project permits subject to the Resource Protection Ordinance, this mitigation measure ensures that the same level of

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protection is applied whenever feasible to other projects. As such, potential impacts to riparian habitat and other sensitive natural communities will be reduced.

- Bio-2.4 is the implementation of the Watershed Protection, Storm Water Management, and Discharge Control Ordinance to protect wetlands. By applying these provisions to development projects, potential indirect impacts to riparian habitat and other sensitive natural communities from stormwater runoff will be reduced.

The Project also includes policies from the General Plan Conservation and Open Space Element and the Land Use Element that address riparian habitat and other sensitive natural communities. The relevant policies are: COS-1.3, COS-1.6 through COS-1.11, COS-2.1, COS-2.2, COS-3.1, LU-6.1, LU-6.2, LU-6.3, LU-6.4, LU-6.6, LU-6.7, and LU-10.2. These policies require monitoring, management and maintenance of a regional preserve system, facilitate preserve assembly and funding, help minimize edge effects, facilitate preparation of habitat conservation plans and resource management plans, direct development to avoid and/or preserve habitat, provide for long-term sustainability of the natural environment, and encourage contiguous open space areas that protect wildlife habitat and corridors. Adherence to these policies will further reduce impacts to riparian habitat and other sensitive natural communities from future development.

Facts in Support of Finding: The Project would have the potential to result in direct and/or indirect loss of riparian habitat and other sensitive natural communities by the removal or destruction of such habitat for new development or infrastructure. Potential indirect impacts include adverse effects to water quality in riparian habitat from pollutants in runoff and sedimentation during construction, and fugitive dust produced by construction that would have the potential to disperse onto sensitive vegetation adjacent to construction sites. Draft Final SEIR, Volume I, Table 2.4-1 estimates that the Project could result in 12,528 acres of direct impacts to habitats, approximately 458 acres of which would qualify as riparian habitat. General Plan Update policies and mitigation measures would reduce impacts to special status species, but not to below a level of significance.

The following measure was also considered to reduce impacts to riparian habitat and other sensitive natural communities to below significant. However, the County has determined that this measure would be infeasible, as described below. Therefore, the following mitigation measure will not be implemented.

(1) Measure: Adopt MSCP Plans for North County and East County that provide coverage for special status species as well as protections for wildlife corridors, habitat linkages, and core habitat areas in those regions.

Rationale for Rejection: This measure is feasible and attainable as the County is currently in the process of preparing such plans. However, these conservation plans

require approval at the federal and State levels, which the County cannot be assured of. In addition, the timing of these programs (i.e., MSCP adoption and implementation) may not coincide with General Plan Update impacts in these areas. While MSCP Plans or similar programs can be implemented without concurrence from other agencies, some of the primary benefits associated with these Habitat Conservation Plans (HCPs) and Natural Community Conservation Planning (NCCP) programs would be lost by doing so. This is because HCPs/NCCPs allow for take of specified federal and state listed species. These "take permits" benefit private landowners in the County as well as numerous public projects which could not be accomplished without a comprehensive conservation plan that addresses multiple species. Given the costs associated with such plans, as well as the public support needed to get them approved and implemented, it is not feasible to adopt MSCP or similar plans for North County and East County without achieving the maximum benefit possible for the public. Therefore, to implement similar plans that would effectively mitigate General Plan Update impacts to riparian habitat and other sensitive natural communities in North County and East County to a level below significance without the included assurances from federal and State permitting agencies would not be feasible for economic and political reasons.

None of the Project alternatives would reduce impacts to riparian habitat and other sensitive natural communities to below significant. While the Environmentally Superior alternative would further reduce the impacts to riparian habitat and other sensitive natural communities, this alternative still allows development that would result in impacts that are not mitigated to a level below significant without adopting the measure noted above. In addition, this alternative would not meet the Project objective of recognizing community and stakeholder interests while striving for consensus.

Conclusion: Because the measure listed above has been found to be infeasible; because application of all feasible mitigation and Project design measures would not achieve a level of less than significant; and because there are no feasible project alternatives that would achieve a level of less than significant; impacts to riparian habitat and other sensitive natural communities would remain significant and unavoidable.

Cumulative Impact – Riparian Habitat and Other Sensitive Natural Communities: As described above, implementation of the proposed General Plan Update would have the potential to result in significant impacts to riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by CDFG or USFWS. In combination with other cumulative projects, the Project would have the potential to result in a significant cumulative impact.

Facts in Support of Finding: Cumulative projects located in the San Diego region have the potential to result in impacts to riparian habitat and other sensitive natural communities if in combination they would cause direct and/or indirect loss or degradation. State regulations such as the California Lake and Streambed Alteration

Program or the California NCCP Act provide protections for riparian and other sensitive habitats. In addition, many projects that affect riparian or other protected habitat types require approval from the USFWS and the CDFG. If potentially significant impacts would occur from particular cumulative projects, then mitigation measures would be implemented to reduce impacts to the extent feasible. However, without a comprehensive NCCP in place for the long-term protection of sensitive natural communities for the entire southern California region, a cumulative loss of riparian and other sensitive habitat would occur, even after mitigation has been implemented for individual projects.

General Plan Update policies and mitigation measures would reduce cumulative impacts to riparian habitat and other sensitive natural communities, but not to below a level of significance. The County has adopted an MSCP South County Subarea Plan for the southwestern portion of the County, but is still developing MSCP Plans for North County and East County areas. Therefore, until the County has adopted the North County and East County Plans with concurrence from State and federal agencies, the project's contribution, in combination with other cumulative projects, would be cumulatively considerable.

B-3 **Significant Effect – Wildlife Movement Corridors and Nursery Sites**: The FEIR identifies significant impacts that would interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.

Mitigation Measures: The mitigation measures identified in the FEIR partially mitigates the significant impact as follows:

- Bio-1.1 is the preparation of a Conservation Subdivision Program that facilitates conservation-oriented project design through changes to the Subdivision Ordinance, Resource Protection Ordinance, Zoning Ordinance, and Groundwater Ordinance. This program will promote conservation of natural resources and open space while improving mechanisms for flexibility in project design so that production of housing stock is not negatively impacted. Additionally, any such allowances of flexibility must be done with consideration of community character through planning group coordination and/or findings required for Project approval.

- Bio-1.2 requires the County to implement and revise existing Habitat Conservation Plans/Policies to preserve sensitive resources within a cohesive system of open space; and to continue preparation of Multiple Species Conservation Program (MSCP) Plans for North County and East County. Implementation of the existing South County MSCP has been very effective in preserving wildlife movement corridors and nursery sites; and this measure will ensure that this success is continued and carried forward to future MSCP efforts.

- Bio-1.3 requires the County to implement conservation agreements through Board Policy I-123, as this will facilitate preservation of high-value habitat in the County's MSCP Subarea Plan. This measure preserves wildlife movement corridors and nursery sites in the unincorporated County.

- Bio-1.4 requires the County to coordinate with nonprofit groups and other agencies to acquire preserve lands. This measure will help continue the County's success with acquiring large areas of open space that contain wildlife movement corridors and nursery sites throughout the region.

- Bio-1.5 directs the County to utilize County Guidelines for Determining Significance for Biological Resources to identify adverse impacts to biological resources, and to utilize the County's Geographic Information System (GIS) records and the Comprehensive Matrix of Sensitive Species to locate special status species populations on or near project sites. This information will be used to avoid or mitigate potential project impacts to wildlife movement corridors and nursery sites in the County as appropriate.

- Bio-1.6 is the implementation of the Resource Protection Ordinance (RPO), the Biological Mitigation Ordinance (BMO), and the Habitat Loss Permit (HLP) Ordinance to protect wetlands, wetland buffers, sensitive habitat lands, biological resource core areas, linkages, corridors, high-value habitat areas, subregional coastal sage scrub focus areas, and populations of rare, or endangered plant or animal species. These ordinances are part of the County regulatory code and explicitly mandate preservation of sensitive biological resources.

- Bio-1.7 requires the County to minimize edge effects from development projects located near sensitive resources by implementing the County Noise Ordinance, the County Groundwater Ordinance, the County's Landscaping Regulations (currently part of the Zoning Ordinance), and the County Watershed Protection, Storm Water Management, and Discharge Control Ordinance. Implementation of these ordinances reduces potential indirect impacts wildlife movement corridors and nursery sites.

- Bio-2.3 is the requirement that wetlands and wetland buffer areas are adequately preserved whenever feasible to maintain biological functions and values. While this preservation requirement is applied to project permits subject to the Resource Protection Ordinance, this mitigation measure ensures that the same level of protection is applied whenever feasible to other projects. As such, potential impacts to wildlife movement corridors and nursery sites will be reduced.

The Project also includes policies from the General Plan Conservation and Open Space Element and Land Use Element that address wildlife movement corridors and/or nursery sites. The relevant policies are: COS-1.1 through COS-1.5, LU-6.1, LU-6.7. These policies allow creation, protection, maintenance and management of a coordinated

biological preserve system that includes Biological Resource Core Areas, wildlife corridors, and linkages to allow wildlife to travel throughout their habitat ranges. Policy COS-1.2 prohibits private development within established preserves. Adherence to these policies will further reduce impacts to wildlife movement corridors and nursery sites from future development.

Facts in Support of Finding: The Project would have the potential to result in impacts to wildlife movement corridors and the use of native wildlife nursery sites. Development associated with the designated land uses would have potentially significant direct and indirect impacts to sensitive habitats, including habitats that currently function as a wildlife movement corridor or a nursery site. General Plan Update policies and mitigation measures would reduce impacts to wildlife movement corridors and nursery sites, but not to below a level of significance.

The following measure was also considered to reduce impacts to wildlife movement corridors and nursery sites to below significant. However, the County has determined that this measure would be infeasible, as described below. Therefore, the following mitigation measure will not be implemented.

(1) Measure: Adopt MSCP Plans for North County and East County that provide coverage for special status species as well as protections for wildlife corridors, habitat linkages, and core habitat areas in those regions.

Rationale for Rejection: This measure is feasible and attainable as the County is currently in the process of preparing such plans. However, these conservation plans require approval at the federal and State levels, which the County cannot be assured of. In addition, the timing of these programs (i.e., MSCP adoption and implementation) may not coincide with General Plan Update impacts in these areas. While MSCP Plans or similar programs can be implemented without concurrence from other agencies, some of the primary benefits associated with these Habitat Conservation Plans (HCPs) and Natural Community Conservation Planning (NCCP) programs would be lost by doing so. This is because HCPs/NCCPs allow for take of specified federal and state listed species. These “take permits” benefit private landowners in the County as well as numerous public projects which could not be accomplished without a comprehensive conservation plan that addresses multiple species. Given the costs associated with such plans, as well as the public support needed to get them approved and implemented, it is not feasible to adopt MSCP or similar plans for North County and East County without achieving the maximum benefit possible for the public. Therefore, to implement similar plans that would effectively mitigate General Plan Update impacts to wildlife movement corridors and nursery sites in North County and East County to a level below significance without the included assurances from federal and State permitting agencies would not be feasible for economic and political reasons.

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None of the Project alternatives would reduce impacts to wildlife movement corridors and nursery sites to below significant. While the Environmentally Superior alternative would further reduce the impacts to riparian habitat and other sensitive natural communities, this alternative still allows development that would result in impacts that are not mitigated to a level below significant without adopting the measure noted above. In addition, this alternative would not meet the Project objective of recognizing community and stakeholder interests while striving for consensus.

Conclusion: Because the measure listed above has been found to be infeasible; because application of all feasible mitigation and Project design measures would not achieve a level of less than significant; and because there are no feasible Project alternatives that would achieve a level of less than significant; impacts to wildlife movement corridors and nursery sites would remain significant and unavoidable.

Cumulative Impact – Wildlife Movement Corridors and Nursery Sites: As described above, implementation of the proposed General Plan Update would have the potential to result in significant impacts that would interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. In combination with other cumulative projects, the Project would have the potential to result in a significant cumulative impact.

Facts in Support of Finding: Cumulative projects located in the San Diego region would have the potential to result in a cumulative impact associated with wildlife movement corridors and nursery sites. Applicable federal and/or State regulations such as the California NCCP Act provide protections for wildlife movement corridors and nursery sites. However, without a comprehensive NCCP in place for the long-term protection of wildlife movement corridors and nursery sites for the entire southern California region, a cumulative loss of wildlife movement corridors and nursery sites would occur, even after mitigation has been implemented for individual projects. Therefore, a significant cumulative impact associated with wildlife movement corridors and nursery sites would occur.

General Plan Update policies and mitigation measures would reduce cumulative impacts to wildlife movement corridors and nursery sites, but not to below a level of significance. The County has adopted an MSCP South County Subarea Plan for the southwestern portion of the County, but is still developing MSCP Plans for North County and East County areas. Therefore, until the County has adopted the North County and East County Plans with concurrence from State and federal agencies, the Project's contribution, in combination with other cumulative projects, would be cumulatively considerable.

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PUBLIC SERVICES

B-4 **Significant Effect – School Services**: The FEIR identifies significant impacts associated with the provision of new or physically altered school facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for schools.

Mitigation Measures: The mitigation measures identified in the FEIR partially mitigate the significant impact as follows:

- Pub-1.1 requires the County to participate in interjurisdictional reviews to gather information on and review and provide comments on plans for new or expanded governmental facilities in the region. This will ensure that potential environmental impacts associated with new or expanded school services are identified and adequate mitigation is requested.

- Pub-1.2 requires that the County plan and site governmental facilities that are context-specific according to their location in village, semi-rural, or rural lands. This will minimize potential environmental effects that result from incompatible uses (e.g., visual impacts, noise impacts, groundwater impacts, etc.).

- Pub-1.3 is the revision of Board Policy I-63 to minimize leapfrog development and to establish specific criteria for General Plan Amendments proposing expansion of areas designated Village regional category. This is intended to limit unexpected demands for new or expanded public services and the associated governmental facilities.

- Pub-3.1 requires the County to coordinate with school districts to encourage siting new facilities in accordance with the County's General Plan and encourage implementing feasible mitigation measures to mitigate environmental impacts. This will help prevent or reduce significant impacts associated with the construction or expansion of school facilities.

- Pub-3.2 requires the County to implement, and revise as necessary, Board Policy I-84 requiring that discretionary project applications include commitments from available school districts. This measure ensures that provision of school facilities is considered prior to new discretionary projects such as residential subdivisions that would potentially necessitate construction or expansion of such services.

The Project also includes policies in the Land Use Element that address the provision of new or expanded school services. The relevant policies are: LU-1.4, LU-9.4, LU-9.7, LU-12.3, LU-12.4, LU-17.1 through LU-17.4, LU-18.1, and LU-18.2. These policies limit village expansions subject to public services availability, encourage the placement of new schools development within town centers and villages, guide development with

compatibility of infrastructure and services, set standards for new school development in a manner that would reduce hazardous, transportation and visual impacts, and encourage the co-location of civic uses such as libraries, community centers, parks and schools. Adherence to these policies will further reduce impacts associated with school services.

Facts in Support of Finding: School districts offer education to all school-age residents of the region, but operate entirely independent of the County of San Diego government. School districts were created by the State and are subject to the overview of the State Legislature. Elected governing school boards are responsible for budgeting and decision-making. The State Department of Education establishes school site and construction standards. It is anticipated that the majority of school districts serving unincorporated San Diego County will experience growth under the General Plan Update, thereby necessitating the construction or expansion of school facilities.

The County does not have the authority to plan, design, approve or construct school facilities; that is the responsibility of individual school districts that serve as their own lead agency under CEQA. However, the County may have permit or land use authority if it is a responsible agency. Due to the County's limited authority over the construction or expansion of school facilities, the County would not be able to ensure that the construction of new facilities would have a less than significant impact on the environment. Therefore, even with the implementation of the above policies and mitigation measures, impacts would be significant and unavoidable.

None of the Project alternatives would reduce impacts associated with school services to below significant. While the Environmentally Superior alternative would further reduce demand for school facilities, this alternative still allows development that would result in impacts that are not mitigated to a level below significant without adopting the measures noted above. In addition, this alternative would not meet the Project objective of recognizing community and stakeholder interests while striving for consensus.

Conclusion: Because the County does not have authority to ensure impacts are mitigated below significant; because application of all feasible mitigation and Project design measures would not necessarily achieve a level of less than significant; and because there are no feasible Project alternatives that would achieve a level of less than significant; impacts associated with school services would remain significant and unavoidable.

Cumulative Impact – School Services: As described above, implementation of the General Plan Update would have the potential to necessitate provision of new or physically altered school facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for schools. In combination with other cumulative projects, the Project would have the potential to result in a significant cumulative impact.

Facts in Support of Finding: Cumulative projects located in the San Diego region that involve residential development would have the potential to increase the public school population in the region and require the construction or expansion of school facilities so that adequate service ratios are maintained. The General Plan Update would increase demand for school facilities requiring the provision of new or physically altered school facilities, which would have a cumulatively considerable contribution to this impact.

General Plan Update policies and mitigation measures would reduce cumulative impacts associated with school services, but not to below a level of significance. Additional mitigation measures as described above for project-level impacts were considered but found to be infeasible. School districts would act as the lead agency to approve school related construction projects, and therefore the County would not be able to ensure that the construction of new school facilities would not have significant impacts to the environment. Therefore, Project impacts associated with school services would remain cumulatively considerable.

Section C – Finding (3)

Pursuant to Section 15091(a)(3) of the State CEQA Guidelines, the County Board of Supervisors finds that, for each of the following significant effects identified in the FEIR, specific economic, legal, social, technological, or other considerations make the mitigation measures or Project alternatives infeasible:

AESTHETICS

C-1 Significant Effect – Visual Character or Quality: The FEIR identifies significant impacts from future development that would substantially degrade the existing visual character or quality of the areas of the Project and its surroundings by introducing features that would detract from or contrast with the existing visual character and/or quality of a neighborhood, community, or localized area.

Mitigation Measures: The mitigation measures identified in the FEIR partially mitigate the significant impact as follows:

- Aes-1.1 is the adoption of a General Plan Regional Category Map and Land Use Maps which locate land uses of less density or intensity on lands that contribute to scenic vistas. This will reduce potential contrasts that future development in proximity to scenic vistas may have with the surrounding setting.

- Aes-1.2 requires protection of sensitive biological habitats and species through regulations that require avoidance and mitigation of impacts, such as through the Biological Mitigation Ordinance, the Resource Protection Ordinance, and Habitat Loss Permit Ordinance. By conserving natural resources, these regulations also preserve the visual character and quality of a large portion of the Project area.

- Aes-1.3 is the update of community plans with improved vision and community character statements to ensure that new development reflects the character and visions for each individual unincorporated community. This will better clarify what developments need to do to maintain community character and visual quality of an area.

- Aes-1.4 is the revision of the Design Review process to streamline the process, improve consistency in implementation, and update design criteria as necessary. Current components of that process include Special Area Designators, Design Review Guidelines, and the Site Plan review and approval process. This will allow a more current and consistent approach to a subjective issue, thereby ensuring that surrounding visual quality and character are considered during the site design process to minimize potential impacts.

- Aes-1.5 is the preparation and implementation of a Conservation Subdivision Program that facilitates conservation-oriented project design. Under this program, future subdivisions will be encouraged to use preserve design standards to conserve resources on site and minimize impacts to natural resources. Such a program would guide preservation adjacent to other open space areas. Thus, new subdivisions will be less likely to degrade existing visual character or quality.

- Aes-1.6 requires community review and specific compatibility findings for development projects that may have significant adverse effects on the scenic quality of the community. This will ensure that project designs are compatible with the surrounding context.

- Aes-1.7 is the development and implementation of programs and regulations that preserve agricultural lands. Agricultural lands are often key components of scenic vistas and community character. Therefore, preservation of these lands will help to minimize potential impacts to scenic resources.

- Aes-1.8 is the continuation and implementation of programs and regulations that minimize landform alteration and preserve ridgelines and steep slopes where appropriate. This measure will protect the County's unique topography which adds to the visual quality of the unincorporated area.

- Aes-1.9 requires that the County work with communities and other stakeholders to identify key scenic vistas, viewsheds of County scenic roads and highways, and

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other areas of specific scenic value. It further requires application of Resource Conservation Area designations or other special area designators, guidelines, and tools to guide future development of parcels within these viewsheds to avoid impacts to scenic vistas. This cooperative effort among stakeholders and the subsequent changes in land use regulations will ensure that future development near important visual resources will avoid or mitigate potential impacts to the surrounding visual character.

- Aes-1.10 requires the County to participate in local and regional planning efforts with other agencies. This includes participation in SANDAG and other regional planning forums, reviewing and commenting on planning and environmental documents issued by other agencies, and ongoing collaboration with Native American tribes and adjacent jurisdictions. In so doing, the County will be able to better identify important visual resources within or near its land use jurisdiction and ensure that future development be designed or screened such that it will not adversely affect the nearby visual character or quality.

- Aes-1.11 requires implementation of the Wireless Communications Ordinance and BOS Policies I-92 and J-17 to encourage the undergrounding of utilities. Combined with the on-going effort to convert existing overhead utilities, this measure will substantially reduce potential impacts to scenic resources from overhead utilities throughout the County unincorporated area.

- Aes-3.1 is the update of County road standards to provide standards related to road design, parking, landscaping, and elements of the public realm that are critical to the character of a community. These standards would reduce or prevent potential visual impacts associated with road improvements that would otherwise conflict with the character of the surrounding community or setting.

- Aes-3.2 is the implementation of existing, and preparation of new, community right-of-way development standards, as appropriate, that supplement the County road standards in order to recognize the unique constraints and character of different communities. These standards will further provide setting-specific guidance that would minimize potential community character impacts from future road improvements.

The Project also incorporates General Plan policies in the Land Use, Mobility and Housing Elements which would reduce the potential for visual character and quality impacts. The relevant policies are: LU-1.4, LU-2.1, LU-2.2, LU-2.3, LU-2.5, LU-4.1, LU-4.2, LU-4.3, LU-4.4, LU-11.2, LU-12.4, M-10.6, and H-2.1. These policies require community plans to be maintained, guide development to reflect community character, assign appropriate densities and minimum lot sizes, limit expansions of village densities unless consistent with community character, require regional coordination, plan for infrastructure to match community character, limit and guide parking in rural areas, and

require that development in existing residential areas respect the surrounding character. Adherence to these policies will further reduce impacts associated with visual character or quality from future development.

Facts in Support of Finding: Implementation of the Project has the potential to result in the degradation of, or substantial change in, the existing visual character or quality of communities throughout the unincorporated County. General Plan Update policies and mitigation measures (described above), have been identified that would reduce these impacts, but not to below a level of significance.

The following measures were also considered to reduce impacts to visual character or quality to below significant. However, the County has determined that these measures would be infeasible, as described below. Therefore, the following mitigation measures will not be implemented.

(1) Measure: Require revised goals and policies to be prepared and incorporated into community plans that would severely limit the potential for development growth in order to maintain the existing visual character or quality of each community.

Rationale for rejection: Severe restrictions on the type or amount of development within a community would conflict with areas identified for increased growth under the General Plan Update and with one of the primary Plan Objectives to support a reasonable share of projected regional population growth. In addition, such restrictions would not permit the plan to accomplish the goal of reinforcing the vitality, local economy and individual character of existing communities while balancing housing, employment and recreational opportunities because it would restrict any form of development . Therefore, this measure is rejected as not meeting the goals of the Project. . The measure would also conflict with goals of the Housing Element to provide sufficient housing stock.

(2) Measure: Comprehensively expand the Zoning Ordinance to specifically dictate the exact development type and design allowed in the various areas of the County to avoid impacts to community character. This measure would be the equivalent of preparing detailed land development master plans for the entire County.

Rationale for rejection: This measure is infeasible because of the extent and diversity of communities that exist within the County. While the County intends to improve the Zoning Ordinance and associated Design Review Guidelines for some areas, as well as prepare town center plans where appropriate, comprehensive coverage of all unincorporated areas in this manner is not feasible.

(3) Measure: Approve only development that is comparable in size, scope, and use as existing development in order to avoid impacts to the visual character and quality of the County's communities.

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Rationale for rejection: This measure would be infeasible because it would result in restrictions on future development in areas identified for increased growth in the General Plan Update and/or areas where existing land uses are not the same as the land uses proposed by the General Plan Update. In addition, in some areas, the existing size, scope and use are not environmentally sensitive and this would not allow more innovative land use approaches. Therefore, this measure would also conflict with goals of the Housing Element to provide sufficient housing stock and would not achieve one of the primary objectives of the Project which is to accommodate a reasonable share of regional growth.

None of the Project alternatives would completely eliminate impacts to visual character or quality. While the Environmentally Superior alternative would reduce the impacts to visual character and quality, this alternative still allows development that would result in impacts that are not mitigated to a level below significant without adopting the measures noted above. In addition, this alternative would not meet the Project objective of recognizing community and stakeholder interests while striving for consensus.

Conclusion: Because the measures listed above have been found to be infeasible; because application of all feasible mitigation and Project design measures would not achieve a level of less than significant; and because there are no feasible Project alternatives that would achieve a level of less than significant; impacts to visual character and quality would remain significant and unavoidable.

Cumulative Impact – Visual Character or Quality: As described above, implementation of the Project would have the potential to degrade the existing visual character or quality of a community. In combination with other cumulative projects, the Project would have the potential to result in a significant cumulative impact.

Facts in Support of Finding: Cumulative projects located in the San Diego region would have the potential to result in a cumulative impact to visual character or quality if, in combination, they would substantially degrade the existing visual character or quality of the site and its surroundings by introducing features that would detract from or contrast with the existing visual character and/or quality of a neighborhood, community, or localized area. A cumulative impact to community character may occur from projects already in process in the County that would not be consistent with the General Plan Update. Additionally, projects in Mexico or on tribal lands may not be subject to regulations protecting community character, or they may have different standards. Therefore, the cumulative projects in the region would have the potential to result in a significant cumulative impact related to visual character or quality. The General Plan Update would have a cumulatively considerable contribution to this impact.

General Plan Update policies and mitigation measures would reduce cumulative impacts to visual character and quality, but not to below a level of significance. Additional

mitigation measures as described above for project-level impacts were considered but found to be infeasible. Therefore, Project impacts to visual character or quality would remain cumulatively considerable for the reasons noted above. .

C-2 **Significant Effect – Light or Glare:** The FEIR identifies significant impacts from future development that would create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

Mitigation Measures: The mitigation measures identified in the FEIR partially mitigate the significant impact as follows:

The proposed Project would have the potential to result in increased light within the County that would adversely affect day or nighttime views. The Project incorporates General Plan Update policies and mitigation measures that would reduce direct impacts associated with increased light, but not to below a level of significance.

- Aes-4.1 requires the County to coordinate with communities and stakeholders to review light pollution controls and consider amendments or expansions to those controls as determined necessary to reduce impacts to dark skies that are important to community character. This will ensure that potential artificial lighting impacts from development are monitored and controlled as needed to preserve community character.

- Aes-4.2 requires the County to maintain light and glare regulations that minimize impacts to adjacent properties, sensitive areas, community character, observatories, and dark skies. These regulations are currently found in the Light Pollution Code and Zoning Ordinance. Additional reviews are implemented on discretionary projects in accordance with CEQA and the County's CEQA guidelines. These efforts will help protect the existing unincorporated area and surrounding environment from excessive artificial lighting impacts.

- Aes-4.3 is the participation in local and regional planning to the extent practicable. This includes participation in SANDAG and other regional planning forums, reviewing and commenting on planning and environmental documents issued by other agencies, and ongoing collaboration with Native American tribes and adjacent jurisdictions. This inter-agency coordination will help identify any needed adjustments to lighting controls among jurisdictions to maintain dark skies and community character.

The Project also includes policies from the General Plan Conservation and Open Space Element which would reduce the potential for light or glare impacts. The relevant policies are: COS-13.1, COS-13.2, and COS-13.3. These policies promote the preservation of dark skies that is necessary for local observatories and that contributes to the rural character of a community as well as restrict outdoor lighting and glare from

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development projects in semi-rural and rural areas. In addition, Policy COS-13.2 requires that development in areas surrounding the Palomar Mountain and Mount Laguna Observatories be designed to maintain dark skies to the maximum extent feasible. As such, adherence to these policies will further reduce impacts associated with light or glare from future development.

Facts in Support of Finding: The Project would have the potential to result in a substantial new source of light or glare from future development that requires night lighting, such as security lighting in commercial areas, or from the use of materials that would result in glare, such as expanses of glass on office buildings. Most of the General Plan Update land use designations would be consistent with existing conditions, though intensified development would be accommodated in several town centers.

The following measure was also considered to reduce lighting impacts to below significant. However, the County has determined that this measure would be infeasible, as described below. Therefore, the following mitigation measure will not be implemented.

(1) Measure: Expand the Light Pollution Code (County of San Diego Code of Regulatory Ordinances sections 59.101-59.115) Zone A designation to encompass all of the unincorporated areas and create more stringent standards, including, but not limited to:

- Nighttime lighting curfew of 10:00 p.m. for certain areas
- Prohibit development requiring any night lighting within certain areas

Rationale for rejection: This measure would result in restrictions on future development in areas identified for increased growth because night lighting is required for safety or other reasons for development accommodated within Zone A areas. The resulting restrictions could pose safety concerns, increase development costs, and in some cases, pose restrictions so great that a particular use may not be possible. Therefore, this measure could conflict with goals of the Housing Element to provide sufficient housing stock and would not achieve one of the primary objectives of the Project which is to accommodate a reasonable amount of regional growth. This measure could also impede attainment of other objectives such as minimizing public costs of infrastructure and services and reinforcing the vitality and local economy of communities.

None of the Project alternatives would reduce impacts associated with lighting or glare to below significant. While the Environmentally Superior alternative would further reduce lighting and glare impacts, this alternative still allows development that would result in impacts that are not mitigated to a level below significant without adopting the measure noted above. In addition, this alternative would not meet the Project objective of recognizing community and stakeholder interests while striving for consensus.

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Conclusion: Because the measure listed above has been found to be infeasible; because application of all feasible mitigation and Project design measures would not achieve a level of less than significant; and because there are no feasible Project alternatives that would achieve a level of less than significant; impacts associated with light would remain significant and unavoidable.

Cumulative Impact – Light or Glare: The Project would have a cumulatively considerable contribution to a significant cumulative impact in the region associated with increased light. The General Plan policies and mitigation measures would reduce cumulative impacts to nighttime lighting, but not to below a level of significance.

Facts in Support of Finding: The construction and operation of cumulative projects located in the San Diego region would have the potential to result in a new source of glare from new development or redevelopment that requires night lighting, such as security lighting in commercial areas, or is constructed with materials that would result in glare, such as expanses of glass on office buildings. Impacts from glare are generally localized and not cumulative in nature; therefore, a significant cumulative impact related to glare would not occur. However, any new sources of nighttime light pollution in the San Diego region would result in a potential lighting impact to the Palomar Mountain and Mount Laguna Observatories. Therefore, the cumulative projects in the region would have the potential to result in a significant cumulative impact associated with nighttime lighting. An additional mitigation measure as described above for project-level impacts was considered but found to be infeasible. Therefore, Project impacts associated with light and glare would remain cumulatively considerable.

AGRICULTURAL RESOURCES

C-3 Significant Effect – Conversion of Farmland: The FEIR identifies significant impacts related to the conversion of San Diego County Agricultural Resources (including, but not limited to, Prime Farmland, Unique Farmland, Farmland of Statewide or Local Importance, pursuant to the FMMP of the California Resources Agency), or other agricultural resources, to non-agricultural use.

Mitigation Measures: The mitigation measures identified in the FEIR partially mitigate the significant impacts as follows:

- Agr-1.1 is the implementation of the General Plan Regional Category map and Land Use Maps which protect agricultural lands with lower density land use designations that will support continued agricultural operations. This measure is a substantial change in allowable uses where agricultural and other natural resources occur. By lowering density in rural areas, the potential conversion of agriculture to development will be considerably reduced.

- Agr-1.2 requires the County to develop and implement programs and regulations that protect agricultural lands, as well as those that support implementation of the Williamson Act. Implementation programs include County CEQA guidelines, Zoning Ordinance, Subdivision Ordinance, Right to Farm Act, Open Space Subvention Act, Farm and Ranch Lands Protection Program, San Diego County Agricultural Enterprises and Consumer Information Ordinance, BOS Policy I-133, and the San Diego County Farming Program. Each of these programs or regulations places limits on allowable impacts to agriculture, thereby substantially reducing the amount of conversion to non-agricultural uses.

- Agr-1.3 requires the County to create a Conservation Subdivision Program that facilitates conservation-oriented project design through changes to the Subdivision Ordinance, Resource Protection Ordinance, Zoning Ordinance, Groundwater Ordinance, and other regulations as necessary with the goal of promoting conservation of natural resources and open space (including agricultural lands) while improving mechanisms for flexibility in project design so that the production of housing is not negatively impacted. This program will provide sufficient area on subdivision project sites to continue agricultural production while still creating new parcels.

- Agr-1.4 requires the County to develop and implement the PACE program which compensates landowners for voluntarily limiting future development on their land. This program will incentivize the placement of agricultural conservation easements on farmland, thereby increasing preservation and reducing conversion of agricultural resources in San Diego County.

- Agr-1.5 is the revision of community plans to identify important agricultural areas, specific compatible uses, and desired buffers necessary to maintain the viability of agriculture in that area. Since community plans are used to review development projects, these revisions will limit future conversion of farmland identified as important for each community.

The Project also includes policies in the Land Use and Conservation and Open Space Elements which would reduce the potential for direct conversion of farmland. The relevant policies are: LU-6.4, LU-7.1, LU-7.2, and COS-6.4. These policies will guide development to preserve existing agricultural resources, encourage acquisition and voluntary dedication of conservation easements and programs, and promote the agricultural industry within the County to ensure the long term-viability of agricultural resources. Adherence to these policies will further reduce impacts associated with the direct conversion of agricultural resources from future development.

Facts in Support of Finding: Implementation of the Project could result in the direct conversion of 48.5 acres (Draft Final SEIR, Volume I, Table 2.2-1) of agricultural resources to non-agricultural land uses. The Project has incorporated General Plan

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Update policies and mitigation measures (described above) that would reduce these impacts, but not to below a level of significance.

The following measures were considered to reduce impacts associated with the direct conversion of agricultural resources within the unincorporated County to below a level of significance. However, the County has determined that these measures would be infeasible, as described below. Therefore, these measures will not be implemented.

(1) Measure: Restrict any development of land with densities of 1 du/acre or more, due to potential incompatibilities with agricultural resources.

Rationale for Rejection: This measure would be infeasible because it would result in restrictions on future development in areas identified for increased growth under the proposed Project. Agricultural operations occur throughout the County unincorporated area. Restricting land use densities of 1 du/acre or more in areas that support agriculture would result in a greater concentration of lower density land uses distributed throughout the unincorporated County and would discourage sustainable growth, an objective of the Project. Infrastructure costs, vehicle miles traveled and environmental impacts associated with development would be increased. This mitigation measure would conflict with the Project objective of promoting sustainability by locating new development near existing infrastructure, services and jobs and would conflict with the goal of supporting a reasonable share of projected regional population growth.

(2) Measure: Create a land use designation solely for agricultural resources, within which no other land uses would be allowable.

Rationale for Rejection: This measure would be infeasible because it would result in restrictions on future development in areas identified for increased growth under the proposed Project and/or areas where existing land uses are not the same as the land uses proposed by the Project. Additionally, many agricultural operations throughout the unincorporated County are unique in that they operate on small lots, located adjacent to a variety of land uses, such as residential. Creating an agriculture-resource-only land use designation would negatively impact many existing County agricultural operations located in non-agricultural land uses. Therefore, this measure would conflict with the Project's objective to preserve agriculture as an integral component of the region's economy, character, and open space network.

None of the Project alternatives would reduce impacts associated with conversion of farmland to below significant. While the Environmentally Superior alternative would further reduce these agricultural resource impacts, this alternative still allows development that would result in impacts that are not mitigated to a level below significant without adopting the measures noted above. In addition, this alternative

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would not meet the Project objective of recognizing community and stakeholder interests while striving for consensus.

Conclusion: Because the measures listed above have been found to be infeasible; because application of all feasible mitigation and Project design measures would not achieve a level of less than significant; and because there are no feasible Project alternatives that would achieve a level of less than significant; impacts associated with the conversion of farmland would remain significant and unavoidable.

Cumulative Impact – Conversion of Farmland: As described above, implementation of the proposed Project would have the potential to convert San Diego County agricultural resources to non-agricultural use. In combination with other cumulative projects, the Project would have a cumulatively considerable contribution to a regionally significant impact to the direct conversion of agricultural land.

Facts in Support of Finding: Cumulative projects located in the San Diego region would have the potential to result in a cumulative impact to agricultural resources if, in combination, they would convert existing agriculture to non-agricultural uses. A cumulative impact to agricultural resources can occur from adjacent jurisdictions due to placement of incompatible uses near agriculture. The General Plan Update would have a cumulatively considerable contribution to this impact.

The Project incorporates General Plan Update policies and mitigation measures that would reduce cumulative impacts to agricultural resources, but not to below a level of significance. Additional mitigation measures as described above for project-level impacts were considered but found to be infeasible. Therefore, Project impacts associated with the direct conversion of farmland would remain cumulatively considerable.

C-4 **Significant Effect – Indirect Conversion of Farmland:** The FEIR identifies significant impacts involving other changes in the existing environment which, due to their location or nature, could result in conversion of a San Diego County agricultural resource to non-agricultural use.

Mitigation Measures: The mitigation measures identified in the FEIR partially mitigate the significant impacts as follows:

- Agr-1.1 is the implementation of the General Plan Regional Category map and Land Use Maps which protect agricultural lands with lower density land use designations that will support continued agricultural operations. This measure is a substantial change in allowable uses where agricultural and other natural resources occur. By lowering density in rural areas, the potential for indirect conversion of agriculture, through compatibility conflicts between existing agriculture and new development, will be considerably reduced.

- Agr-1.2 requires the County to develop and implement programs and regulations that protect agricultural lands, as well as those that support implementation of the Williamson Act. Implementation programs include County CEQA guidelines, Zoning Ordinance, Subdivision Ordinance, Right to Farm Act, Open Space Subvention Act, Farm and Ranch Lands Protection Program, San Diego County Agricultural Enterprises and Consumer Information Ordinance, BOS Policy I-133, and the San Diego County Farming Program. Each of these programs or regulations places limits on allowable impacts to agriculture, thereby substantially reducing the amount of indirect conversion to non-agricultural uses.

- Agr-1.3 requires the County to create a Conservation Subdivision Program that facilitates conservation-oriented project design through changes to the Subdivision Ordinance, Resource Protection Ordinance, Zoning Ordinance, Groundwater Ordinance, and other regulations as necessary with the goal of promoting conservation of natural resources and open space (including agricultural lands) while improving mechanisms for flexibility in project design so that the production of housing is not negatively impacted. This program will provide sufficient area on subdivision project sites to continue agricultural production while still creating new parcels. Moreover, it will lead to a more cohesive network of agriculture rather than a distribution pattern of development mixed with intense agriculture. This will reduce potential compatibility conflicts and indirect conversion of farmland.

- Agr-1.4 requires the County to develop and implement the Purchase of Agricultural Conservation Easement (PACE) program which compensates landowners for voluntarily limiting future development on their land. This program will incentivize the placement of agricultural conservation easements on farmland, thereby increasing preservation and reducing indirect conversion of agricultural resources in San Diego County.

- Agr-1.5 is the revision of community plans to identify important agricultural areas, specific compatible uses, and desired buffers necessary to maintain the viability of agriculture in that area. Community-level planning that identifies important areas for agriculture will minimize potential compatibility conflicts between agriculture and other uses, thereby reducing indirect conversion of farmland.

The Project also includes policies from the General Plan Land Use and Conservation and Open Space Elements which would reduce the potential for indirect conversion of farmland. The relevant policies are: LU-6.4, LU-7.1, LU-7.2, COS-6.2, COS-6.3, and COS-6.4. These policies minimize indirect conversion of farmland by requiring conservation of agricultural lands and operations, and by limiting conflicts from incompatible uses adjacent to farmland. Adherence to these policies will further minimize impacts associated with indirect conversion of agricultural resources from future development.

Facts in Support of Finding: The Project proposes lower densities in many areas with existing agriculture or prime conditions for future agriculture. The Project also redirects growth into areas that may contain agricultural resources, which would potentially cause some indirect conversion of agricultural resources to non-agricultural use because of incompatibility between development accommodated by the Project and existing agricultural activity. Therefore, this would be considered a potentially significant impact. General Plan Update policies and mitigation measures would reduce impacts, but not to below a level of significance.

The following measure was also considered to reduce impacts associated with indirect conversion of farmland to below significant. However, the County has determined that this measure would be infeasible, as described below. As such, the following mitigation measure will not be implemented.

(1) Measure: Within 0.5-mile of any agricultural resource, approve development that is compatible in size and scope with the existing agricultural resource.

Rationale for Rejection: This measure would be infeasible because it would restrict future development in areas identified for increased growth. Small farming operations are typical in the County, and many existing and potential agricultural operations are located on small parcels with intermixed surrounding land uses. This measure would restrict certain types of incompatible development in these areas, which would have the potential to conflict with the land uses proposed under the Project. This measure would also conflict with the Project objective of promoting sustainability by locating new development near existing infrastructure, services and jobs because many existing agricultural resources within the unincorporated County are located in areas where existing infrastructure, services and jobs already exist.

None of the Project alternatives would reduce impacts associated with indirect conversion of farmland to below significant. While the Environmentally Superior alternative would further reduce the indirect impacts to agricultural resources, this alternative still allows development that would result in impacts that are not mitigated to a level below significant without adopting the measure noted above. In addition, this alternative would not meet the Project objective of recognizing community and stakeholder interests while striving for consensus.

Conclusion: Because the measure listed above has been found to be infeasible; because application of all feasible mitigation and project design measures would not achieve a level of less than significant; and because there are no feasible project alternatives that would achieve a level of less than significant; impacts associated with the indirect conversion of farmland would remain significant and unavoidable.

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Cumulative Impact – Indirect Conversion of Farmland: As described above, implementation of the Project would have the potential to involve other changes in the existing environment which, due to their location or nature, could result in conversion of a San Diego County agricultural resource to non-agricultural use. In combination with other cumulative projects, the Project would have the potential to result in a significant cumulative impact.

Facts in Support of Finding: Cumulative projects located in the San Diego region would have the potential to result in a cumulative impact associated with indirect conversion of farmland if, in combination, they would create compatibility conflicts that ultimately result in changes from existing agricultural uses to non-agricultural use. Within the San Diego region, the indirect conversion of farmland is increasing due to population growth and the subsequent development required to support this growth. Land use conflicts often arise from increased agricultural/urban interface areas, high operating costs, and escalating property values. These conflicts have the potential to occur between jurisdictions such as cities, counties, tribal lands, state lands, and federal lands. The Project also has the potential to result in an indirect conversion of agricultural resources to non-agricultural uses from conflicts arising from proposed General Plan Update designations. In combination with other cumulative projects such as development projects allowable under surrounding jurisdictions' authority, the Project would have a cumulatively considerable contribution to a regionally significant impact to the indirect conversion of agricultural land.

General Plan Update policies and mitigation measures would reduce cumulative impacts associated with indirect conversion of agricultural resources to non-agricultural uses, but not to below a level of significance. An additional mitigation measure as described above for project-level impacts was considered but found to be infeasible. Therefore, project impacts associated with indirect conversion of farmland would remain cumulatively considerable.

C-5 Significant Effect – Direct and Indirect Loss or Conversion of Forestry Resources: Since the certification of the 2011 General Plan Update PEIR, the CEQA Guidelines Appendix G Thresholds regarding agricultural resources was expanded to include impacts to forest lands. Since this component was added to Appendix G after the adoption of the PEIR, potential impacts to forestry resources were not analyzed.

While the General Plan Update PEIR did not directly evaluate forest resources in the context of a timber resource; however, forest resources were indirectly evaluated in terms of the habitat types that are also considered forestry resources. The Biological Resources Chapter 2.4, Section 2.4.3.1 of the PEIR discusses habitat impacts, including impacts to the forestry and woodland habitat categories. The PEIR concluded that impacts to the special status plant and wildlife species and their habitats would be significant and unavoidable due to the impacts from future development.

Facts in Support of Finding: The Project area includes approximately 14,320 acres of forest vegetation and 14,291 acres of woodland vegetation, for a total of 28,611 acres of forest resources. Implementation of the Project could result in direct impacts to approximately 3,000 of the 28,611 acres of forest resources (see SEIR Volume I, subsection 2.4.3.2). In addition, a majority of the Project area is adjacent to or surrounded by the CNF lands. Development on lands that contain forestry resources or development near CNF lands could impact forestry resources due to direct conversion of forestry resources and the introduction of incompatible land uses that would restrict future forestry or timber production activities.

While 27,518 of the 28,611 acres are designated as Rural Lands 40 (one dwelling per 40 acres), Rural Lands 80 (one dwelling per 80 acres) or Public Agency and/or Open Space Lands, future development within the Project area could impact forest lands, resulting in a significant impact.

The following measure was considered to reduce or minimize impacts related to the direct loss or conversion of forestry resources within the unincorporated County to below a level of significance. However, the County has determined that this measure would be infeasible, as described below. Therefore, this measure will not be implemented.

(1) Measure: Require that all development proposed within the Project area evaluate and mitigate the direct loss or conversion of forestry resources. This measure would not be feasible because most future development in the Project areas will be permitted with ministerial permits that will not be subject to environmental review.

    Rationale for Rejection: The measure has been found to be infeasible because a majority of development proposed within the Project areas will not be subject to environmental review in which the direct loss or conversion of forestry resources can be quantified. Development will be permitted with ministerial permits and thus is not subject to environmental review. Therefore, even with implementation of the applicable 2011 General Plan policies and mitigation measures listed below, any direct conversion of forestry resources due to private development of parcels within the Project areas addressed in this SEIR would remain significant and unavoidable.

Mitigation Measures: The mitigation measures identified in the FEIR partially mitigate the significant impacts as follows:

- Bio-1.1 creates a Conservation Subdivision Program that facilitates conservation-oriented project design through changes to the Subdivision Ordinance, Resource Protection Ordinance, Zoning Ordinance, Groundwater Ordinance, and other regulations as necessary. It is intended that these changes will promote conservation of natural resources and open space while improving mechanisms for flexibility in project design so that production of housing stock is not negatively impacted. Additionally, any such allowances of flexibility must be done with consideration of

community character through planning group coordination and/or findings required for project approval.

- Bio-1.3 implement conservation agreements through Board Policy I-123, as this will facilitate preservation of high-value habitat in the County's MSCP Subarea Plan.

- Bio-1.6 implements the RPO, BMO, and HLP Ordinance to protect wetlands, wetland buffers, sensitive habitat lands, biological resource core areas, linkages, corridors, high-value habitat areas, sub-regional coastal sage scrub focus areas, and populations of rare, or endangered plant or animal species.

The Project also includes policies in the Land Use and Conservation and Open Space Elements that would reduce impacts to loss or conversion of forestry resources. The relevant policies are: LU-6.1, COS-1.10, and COS-2.2. These policies require monitoring, management and maintenance of a regional preserve system, facilitate preserve assembly and funding, help minimize edge effects, facilitate preparation of habitat conservation plans and resource management plans, direct development to avoid and/or preserve habitat, provide for long-term sustainability of the natural environment, and encourage contiguous open space areas that protect wildlife habitat and corridors. Adherence to these policies will further reduce impacts to special status species from future development.

AIR QUALITY

C-6 **Significant Effect – Air Quality Violations:** The FEIR identifies significant impacts associated with exceedance of quantitative screening-level thresholds (SLTs) for attainment pollutants (NO2, SO2, and CO) and exceedance of SLTs for nonattainment pollutants (O3 precursors and particulate matter).

Mitigation Measures: The mitigation measures identified in the FEIR partially mitigate the significant impacts as follows:

- Air-2.1 is the provision of incentives such as preferential parking for hybrids or alternatively fueled vehicles. This measure also requires the County to establish programs for priority or free parking on County streets or in County parking lots for hybrids or alternatively fueled vehicles. This would encourage use of low-emission vehicles by increasing the benefits of such use for the public.

- Air-2.2 requires replacement of existing vehicles in the County fleet as needed with the cleanest vehicles commercially available that are cost-effective and meet vehicle use needs. This effort would ensure that on-going County municipal operations result in minimal carbon emissions associated with vehicle usage.

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- Air-2.3 is the implementation of transportation fleet fueling standards to improve the number of alternatively fueled vehicles in the County fleet. As with Air-2.2, this measure would ensure County municipal operations result in minimal carbon emissions from vehicle usage.

- Air-2.4 is the provision of incentives to promote the siting or use of clean air technologies where feasible. These technologies shall include, but not be limited to, fuel cell technologies, renewable energy sources, and hydrogen fuel. By increasing the benefits to using or developing such alternatives, potential impacts from pollutants will be substantially reduced.

- Air-2.5 requires mitigation on all construction projects where emissions are above the SLTs. Requirements may include:
    - Multiple applications of water during grading between dozer/scraper passes
    - Paving, chip sealing or chemical stabilization of internal roadways after completion of grading
    - Use of sweepers or water trucks to remove "track-out" at any point of public street access
    - Termination of grading if winds exceed 25 miles per hour
    - Stabilization of dirt storage piles by chemical binders, tarps, fencing or other erosion control
    - Use of low-sulfur fuels in construction equipment
    - Use of low-VOC paints
    - Projects exceeding SLTs will require ten percent of the construction fleet to use any combination of diesel catalytic converters, diesel oxidation catalysts, diesel particulate filters and/or CARB certified Tier I, II, III, IV equipment. Equipment is certified if it meets emission standards established by the EPA for mobile non-road diesel engines of almost all types. Standards established for hydrocarbons, oxides of nitrogen (NOX), carbon monoxide, and particulate matter. Tier I standards are for engines over 50 hp (such as bulldozers) built between 1996 and 2000, and engines under 50 hp (such as lawn tractors) built between 1999 and 2000. Tier II standards are for all engine sizes from 2001 to 2006, and Tier III standards are for engines rated over 50 hp from 2006 to 2008 (EPA 1998). Tier IV standards apply to engines of all sizes built in 2008 or later. Standards are increasingly stringent from Tier I to Tier IV (EPA 2004).

  Application of these types of standards will prevent release of construction-related pollutants, thereby substantially reducing the potential for air quality violations from new development under the General Plan Update.

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- Air-2.6 requires the use of County Guidelines for Determining Significance – Air Quality to identify and mitigate adverse environmental effects on air quality. Use of these guidelines will ensure that discretionary projects under the General Plan Update identify and mitigate significant impacts to air quality.

- Air-2.7 is the implementation of County Air Pollution Control District (APCD) regulations for air emissions from all sources under its jurisdiction. Enforcement of these regulations ensures that development pursuant to the General Plan Update will not violate air quality standards.

- Air-2.8 is the requirement for New Source Reviews to prevent permitting projects that are "major sources." The purpose of these reviews is to allow continued industrial growth in non-attainment areas and, at the same time, ensure that new and modified sources do not aggravate existing air quality problems and/or negate emissions reductions from other sources.

- Air-2.9 is the implementation of the Grading, Clearing, and Watercourses Ordinance, which requires all clearing and grading to be conducted with dust control measures. These measures minimize particulate matter emissions from construction and prevent nuisance to nearby persons or public or private property. Clearing, grading or improvement plans shall require that measures such as the following be undertaken to achieve this result: watering, application of surfactants, shrouding, control of vehicle speeds, paving of access areas, or other operational or technological measures to reduce dispersion of dust.

- Air-2.10 is the revision of Board Policy F-50 to strengthen the County's commitment and requirement to implement resource-efficient design and operations for County-funded renovation and new building projects. This could be achieved by making the guidelines within the policy mandatory rather than voluntary. This will substantially reduce emissions associated with County operations.

- Air-2.11 is the implementation of County Regional Air Quality Strategy (RAQS) to attain State air quality standards for O3. Currently, San Diego County does not meet State and federal health standards for O3.

- Air-2.12 Revise Board Policy G-15 to require County facilities to comply with Silver Leadership in Energy and Environmental Design (LEED) standards or other equivalent Green Building rating systems.

- Air-2.13 Revise Board Policy G-16 to require the County to:

    - Adhere to the same or higher standards it would require from the private sector when locating and designing facilities concerning environmental issues and sustainability; and

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- Require government contractors to use low emission construction vehicles and equipment.

The Project also includes policies from the General Plan Conservation and Open Space Element that address air quality violations. The relevant policies are: COS-14.1, COS-14.2, COS-14.8, COS-14.9, COS-14.10, COS-15.1, COS-15.3, COS-15.4, COS-15.5, COS-16.2, COS-16.3, and COS-20.3. These policies encourage mixed uses and alternative transportation to reduce emissions, reduce land use conflicts that expose people to air pollutants, and apply renewable energy and energy-efficiency practices to future development and to County facilities. Adherence to these policies will further reduce impacts associated with air quality violations from future development.

Facts in Support of Finding: The Project would have the potential to result in a significant impact associated with violation of an air quality standard because emissions of criteria pollutants associated with new residential development under the Project would exceed the screening-level thresholds for air pollutants. The General Plan policies and mitigation measures would reduce direct impacts to air quality violations, but not to below a level of significance.

The following measures were also considered to reduce impacts associated with air quality violations to below significant. However, the County has determined that these measures would be infeasible, as described below. Therefore, the following mitigation measures will not be implemented.

(1) Measure: Require all construction activities to use equipment that is CARB certified Tier 3 or better.

Rationale for Rejection: This measure could not be accomplished because it would require all construction contractors working within the County to turn over their existing equipment which remains usable, and would require a more stringent emissions standard than implemented by CARB. The CARB is in the process of implementing regulations that will require turnover of equipment to meet its regulatory standards starting in 2010 for large vehicle fleets. The measure would limit which construction contractors would be allowed to work within the County and could result in significantly increased costs to project applicants. Therefore, it is infeasible due to legal and economic limitations.

(2) Measure: Prohibit new development that would result in emissions from new vehicle trips that would exceed the screening level thresholds.

Rationale for Rejection: This measure would result in restrictions on future development in areas identified for increased growth because, with current vehicle emissions standards, it would severely limit development densities. This measure is infeasible because it would conflict with the Project's objective to support a

reasonable share of projected regional population growth, because it would prohibit new development in the unincorporated County. In addition, if vehicle trips exceed screening level thresholds but a project is not proposing densities greater than what was expected by the general plan, those trips are accounted for in the RAQS and does not automatically mean the actual ambient air quality standards will be exceeded.

(3) Measure Prohibit use of architectural coatings or other building materials that may result in emissions of VOCs. Only zero-VOC coatings and building materials would be allowed for use in the County.

Rationale for Rejection: This measure would result in undue hardship on the building industry and would unduly limit development, frustrating the goal of supporting a reasonable share of future population growth because most architectural coatings contain some VOCs and the measure would restrict the types of coatings that could be used to a limited type and number of formulations that may not be feasible for all applications. The VOC content in architectural coatings is regulated by the APCD, which has established a phase-in schedule for reduction of VOCs in accordance with the SIP requirements. The measure would also require the County to monitor and enforce the use of architectural coatings at all construction projects within its jurisdiction, which it does not have the funding or staffing available to accomplish.

(4) Measure: Require the construction of new development that would result in a reduction of vehicle trips because developers are able to demonstrate that they tie into an existing or planned alternative transportation network, such as transit (bus, train, trolley), bicycle network, walkways, and trails.

Rationale for Rejection: This measure would result in restrictions on future development in areas identified for increased growth because not all areas of planned growth have an existing or planned alternative transportation network that new development could tie into. Implementation of this mitigation measure would conflict with the Project's objective to reinforce the vitality, local economy and individual character of existing communities by restricting future development to areas with existing alternative transportation networks, which excludes many rural areas.

(5) Measure: Require all applicants to provide on-site renewable energy systems, including solar, wind, geothermal, low-impact hydro power, biomass, and bio-gas.

Rationale for Rejection: This measure would not be feasible for several reasons. All applicants may not be able to provide renewable energy systems at all proposed locations. In addition, some energy systems may trigger additional regulatory requirements from the CPUC or CEC that would make individual projects infeasible to construct. Implementation of this measure would potentially increase

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infrastructure costs, which would conflict with the Project's objective to minimize public costs of infrastructure and services. This measure is therefore infeasible for economic reasons. However, in circumstances where feasible, applicants will be encouraged to provide on-site renewable energy systems.

(6) Measure: Install vegetated roofs that cover at least 50 percent of roof area.

Rationale for Rejection: This measure would be infeasible because residential and commercial buyers may find vegetated roofs to be undesirable, and it places the burden of developing the vegetated roof on the project applicant. The measure may also add additional monitoring requirements on the County to verify that vegetated roofs are properly maintained.

(7) Measure: Provide a spur at nonresidential projects to use nearby rail for goods movement.

Rationale for Rejection: This measure would not be feasible because it would depend on the rail system and the availability of rail transit to individual projects, most of which would not be located near railroad networks. Implementation of this measure would conflict with the Project's objective to ensure that development accounts for physical constraints, since much of the unincorporated County has limited access to the existing rail system.

(8) Measure: Require the use of locally made building materials for construction projects.

Rationale for Rejection: This measure would not be feasible because it would severely limit development projects as some specialized building materials for projects may not be available locally. In addition, the County has neither the legal nor the financial authority to monitor and enforce building material purchases at construction projects within its jurisdiction.

None of the Project alternatives would reduce impacts associated with air quality violations to below significant. While the Environmentally Superior alternative would further reduce the impacts to air quality, this alternative still allows development that would result in impacts that are not mitigated to a level below significant without adopting the measures noted above. In addition, this alternative would not meet the Project objective of recognizing community and stakeholder interests while striving for consensus. As such, there are no known feasible alternatives or mitigation measures that would lessen air quality violation impacts to a level below significant.

Conclusion: Because the measures listed above have been found to be infeasible; because application of all feasible mitigation and project design measures would not achieve a level of less than significant; and because there are no feasible project

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alternatives that would achieve a level of less than significant; impacts associated with air quality violations would remain significant and unavoidable.

Cumulative Impact – Air Quality Violations: As described above, implementation of the project would have the potential to result in a significant violation of an air quality standard. In combination with other cumulative projects, the Project would have the potential to result in cumulatively considerable impacts.

Facts in Support of Finding: Cumulative projects located in the San Diego region would have the potential to result in a significant cumulative air quality violation if, in combination, they would violate any air quality standard or contribute to an existing or projected air quality violation. New stationary sources of criteria pollutants or projects that would increase vehicle trips may result in increases in pollutant emissions. Cumulative projects in other jurisdictions may not be required to comply with set standards or may have significant unavoidable air quality impacts. The Project would potentially have a cumulatively considerable contribution to this impact.

General Plan Update policies and mitigation measures would reduce cumulative impacts to air quality violations, but not to below a level of significance. Additional mitigation measures as described above for project-level impacts were considered but found to be infeasible. Therefore, Project impacts to air quality violations would remain cumulatively considerable.

C-7 **Significant Effect – Non-Attainment Criteria Pollutants:** The FEIR identifies significant impacts related to a cumulatively considerable net increase of any criteria pollutant for which the San Diego Air Basin (SDAB) is non-attainment under applicable federal or State ambient air quality standards (AAQS).

Mitigation Measures: The mitigation measures identified in the FEIR partially mitigate the significant impact as follows:

- Air-2.1 is the provision of incentives such as preferential parking for hybrids or alternatively fueled vehicles. This measure also requires the County to establish programs for priority or free parking on County streets or in County parking lots for hybrids or alternatively fueled vehicles. This would encourage use of low-emission vehicles by increasing the benefits of such use for the public.

- Air-2.2 requires replacement of existing vehicles in the County fleet as needed with the cleanest vehicles commercially available that are cost-effective and meet vehicle use needs. This effort would ensure that on-going County municipal operations result in minimal carbon emissions associated with vehicle usage.

- Air-2.3 is the implementation of transportation fleet fueling standards to improve the number of alternatively fueled vehicles in the County fleet. As with Air-2.2, this

measure would ensure County municipal operations result in minimal carbon emissions from vehicle usage.

- Air-2.4 is the provision of incentives to promote the siting or use of clean air technologies where feasible. These technologies shall include, but not be limited to, fuel cell technologies, renewable energy sources, and hydrogen fuel. By increasing the benefits to using or developing such alternatives, potential impacts from pollutants will be substantially reduced.

- Air-2.5 requires mitigation on all construction projects where emissions are above the SLTs. Requirements may include:
    - Multiple applications of water during grading between dozer/scraper passes
    - Paving, chip sealing or chemical stabilization of internal roadways after completion of grading
    - Use of sweepers or water trucks to remove "track-out" at any point of public street access
    - Termination of grading if winds exceed 25 miles per hour
    - Stabilization of dirt storage piles by chemical binders, tarps, fencing or other erosion control
    - Use of low-sulfur fuels in construction equipment
    - Use of low-VOC paints
    - Projects exceeding SLTs will require ten percent of the construction fleet to use any combination of diesel catalytic converters, diesel oxidation catalysts, diesel particulate filters and/or CARB certified Tier I, II, III, IV equipment. Equipment is certified if it meets emission standards established by the EPA for mobile non-road diesel engines of almost all types. Standards established for hydrocarbons, oxides of nitrogen (NOX), carbon monoxide, and particulate matter. Tier I standards are for engines over 50 hp (such as bulldozers) built between 1996 and 2000, and engines under 50 hp (such as lawn tractors) built between 1999 and 2000. Tier II standards are for all engine sizes from 2001 to 2006, and Tier III standards are for engines rated over 50 hp from 2006 to 2008 (EPA 1998). Tier IV standards apply to engines of all sizes built in 2008 or later. Standards are increasingly stringent from Tier I to Tier IV (EPA 2004).

  Application of these types of standards will prevent release of construction-related pollutants, thereby substantially reducing the potential for pollutants from new development under the Project.

- Air-2.6 requires the use of County Guidelines for Determining Significance – Air Quality to identify and mitigate adverse environmental effects on air quality. Use of

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these guidelines will ensure that discretionary projects under the General Plan Update identify and mitigate significant impacts to air quality.

- Air-2.7 is the implementation of County Air Pollution Control District (APCD) regulations for air emissions from all sources under its jurisdiction. Enforcement of these regulations ensures that development pursuant to the General Plan Update will not violate air quality standards.

- Air-2.8 is the requirement for New Source Reviews to prevent permitting projects that are "major sources." The purpose of these reviews is to allow continued industrial growth in non-attainment areas and, at the same time, ensure that new and modified sources do not aggravate existing air quality problems and/or negate emissions reductions from other sources.

- Air-2.9 is the implementation of the Grading, Clearing, and Watercourses Ordinance, which requires all clearing and grading to be conducted with dust control measures. These measures minimize particulate matter emissions from construction and prevent nuisance to nearby persons or public or private property. Clearing, grading or improvement plans shall require that measures such as the following be undertaken to achieve this result: watering, application of surfactants, shrouding, control of vehicle speeds, paving of access areas, or other operational or technological measures to reduce dispersion of dust.

- Air-2.10 is the revision of Board Policy F-50 to strengthen the County's commitment and requirement to implement resource-efficient design and operations for County-funded renovation and new building projects. This could be achieved by making the guidelines within the policy mandatory rather than voluntary. This will substantially reduce emissions associated with County operations.

- Air-2.11 is the implementation of County Regional Air Quality Strategy (RAQS) to attain State air quality standards for O3. Currently, San Diego County does not meet State and federal health standards for O3.

- Air-2.12 Revise Board Policy G-15 to require County facilities to comply with Silver Leadership in Energy and Environmental Design (LEED) standards or other equivalent Green Building rating systems.

- Air-2.13 Revise Board Policy G-16 to require the County to:

    - Adhere to the same or higher standards it would require from the private sector when locating and designing facilities concerning environmental issues and sustainability; and

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- o Require government contractors to use low emission construction vehicles and equipment.

The Project also includes policies from the General Plan Conservation and Open Space Element that address non-attainment criteria pollutants. The relevant policies are: COS-14.1, COS-14.2, COS-14.8, COS-14.9, COS-14.10, COS-15.1, COS-15.3, COS-15.4, COS-15.5, COS-16.2, COS-16.3, and COS-20.3. These policies encourage mixed uses and alternative transportation to reduce emissions, reduce land use conflicts that expose people to air pollutants, and apply renewable energy and energy-efficiency practices to future development and to County facilities. Adherence to these policies will further reduce impacts associated with non-attainment criteria pollutants from future development.

Facts in Support of Finding: Emissions of criteria pollutants associated with future development under the Project would result in a cumulatively significant impact associated with PM10 and PM2.5, and O3 precursors under California Ambient Air Quality Standards (CAAQS). Future development under the General Plan Update would be required to comply with the San Diego County Regional Air Quality Strategy (RAQS), the State Implementation Plan (SIP), California Air Resources Board (CARB) motor vehicle standards, Air Pollution Control District (APCD) regulations for stationary sources and architectural coatings, Title 24 energy efficiency standards, and the General Plan Update goals and policies. While existing County policies and regulations and the incorporated General Plan Update goals and policies are intended to minimize impacts associated with non-attainment criteria pollutants, implementation of the Project would allow for the development of land uses that would increase County-wide emissions of PM_{10} and $PM_{2.5}$. Therefore, the Project would result in a cumulatively significant impact on air quality. General Plan Update policies and mitigation measures would reduce impacts associated with non-attainment criteria pollutants, but not to below a level of significance.

The following measures were also considered to reduce impacts associated with non-attainment criteria pollutants to below significant. However, the County has determined that these measures would be infeasible, as described below. Therefore, the following mitigation measures will not be implemented.

(1) Measure: Require all construction activities to use equipment that is CARB certified Tier 3 or better.

Rationale for Rejection: This measure could not be accomplished because it would require all construction contractors working within the County to turn over their existing equipment which remains usable, and would require a more stringent emissions standard than implemented by CARB. The CARB is in the process of implementing regulations that will require turnover of equipment to meet its regulatory standards starting in 2010 for large vehicle fleets. The measure would

limit which construction contractors would be allowed to work within the County and could result in significantly increased costs to project applicants. Therefore, it is infeasible due to legal and economic limitations.

(2) Measure: Prohibit new development that would result in emissions from new vehicle trips that would exceed the screening level thresholds.

Rationale for Rejection: This measure would result in restrictions on future development in areas identified for increased growth in the General Plan Update because, with current vehicle emissions standards, it would severely limit development densities. This measure is infeasible because it would conflict with the Project's objective to support a reasonable share of projected regional population growth, because it would prohibit new development in the unincorporated County. In addition, if vehicle trips exceed screening level thresholds but a project is not proposing densities greater than what was expected by the general plan, those trips are accounted for in the RAQS and does not automatically mean the actual ambient air quality standards will be exceeded.

(3) Measure: Prohibit use of architectural coatings or other building materials that may result in emissions of VOCs. Only zero-VOC coatings and building materials would be allowed for use in the County.

Rationale for Rejection: This measure would result in undue hardship on the building industry and would unduly limit development, frustrating the goal of supporting a reasonable share of future population growth because most architectural coatings contain some VOCs and the measure would restrict the types of coatings that could be used to a limited type and number of formulations that may not be feasible for all applications. The VOC content in architectural coatings is regulated by the APCD, which has established a phase-in schedule for reduction of VOCs in accordance with the SIP requirements. The measure would also require the County to monitor and enforce the use of architectural coatings at all construction projects within its jurisdiction, which it does not have the funding or staffing available to accomplish.

(4) Measure: Require the construction of new development that would result in a reduction of vehicle trips because developers are able to demonstrate that they tie into an existing or planned alternative transportation network, such as transit (bus, train, trolley), bicycle network, walkways, and trails.

Rationale for Rejection: This measure would result in restrictions on future development in areas identified for increased growth because not all areas of planned growth have an existing or planned alternative transportation network that new development could tie into. Implementation of this mitigation measure would conflict with the Project's objective to reinforce the vitality, local economy and individual character of existing communities by restricting future development to

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areas with existing alternative transportation networks, which excludes many rural areas.

(5) Measure: Require all applicants to provide on-site renewable energy systems, including solar, wind, geothermal, low-impact hydro power, biomass, and bio-gas.

Rationale for Rejection: This measure would not be feasible for several reasons. All applicants may not be able to provide renewable energy systems at all proposed locations. In addition, some energy systems may trigger additional regulatory requirements from the CPUC or CEC that would make individual projects infeasible to construct. Implementation of this measure would potentially increase infrastructure costs, which would conflict with the Project's objective to minimize public costs of infrastructure and services. This measure is therefore infeasible for economic reasons. However, in circumstances where feasible, applicants will be encouraged to provide on-site renewable energy systems.

(6) Measure: Install vegetated roofs that cover at least 50 percent of roof area.

Rationale for Rejection: This measure would be infeasible because residential and commercial buyers may find vegetated roofs to be undesirable, and it places the burden of developing the vegetated roof on the project applicant. The measure may also add additional monitoring requirements on the County to verify that vegetated roofs are properly maintained.

(7) Measure: Provide a spur at nonresidential projects to use nearby rail for goods movement.

Rationale for Rejection: This measure would not be feasible because it would depend on the rail system and the availability of rail transit to individual projects, most of which would not be located near railroad networks. Implementation of this measure would conflict with the Project's objective to ensure that development accounts for physical constraints, since much of the unincorporated County has limited access to the existing rail system.

(8) Measure: Require the use of locally made building materials for construction projects.

Rationale for Rejection: This measure would not be feasible because it would severely limit development projects as some specialized building materials for projects may not be available locally. The measure would also require the County to monitor and enforce building material purchases at construction projects within its jurisdiction, which it does not have the funding or staffing available to accomplish.

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None of the Project alternatives would reduce impacts associated with non-attainment criteria pollutants to below significant. While the Environmentally Superior alternative would further reduce the impacts to air quality, this alternative still allows development that would result in impacts that are not mitigated to a level below significant without adopting the measures noted above. In addition, this alternative would not meet the Project objective of recognizing community and stakeholder interests while striving for consensus. As such, there are no known feasible alternatives or mitigation measures that would lessen impacts associated with non-attainment criteria pollutants to a level below significant.

Conclusion: Because the measures listed above have been found to be infeasible; because application of all feasible mitigation and project design measures would not achieve a level of less than significant; and because there are no feasible Project alternatives that would achieve a level of less than significant; impacts associated with non-attainment criteria pollutants would remain significant and unavoidable.

Cumulative Impact – Non-Attainment Criteria Pollutants: As described above, implementation of the proposed General Plan Update would have the potential to result in significant impacts associated with non-attainment criteria pollutants. In combination with other cumulative projects, the Project would have the potential to result in a significant cumulative impact.

Facts in Support of Finding: Cumulative projects located in the San Diego region would have the potential to result in a significant cumulative impact associated with non-attainment criteria pollutants if, in combination, they would result in a net increase of any criteria pollutant for which the SDAB is non-attainment. The Project would result in a potentially significant direct impact associated with non-attainment criteria pollutants. Therefore, the General Plan Update would have a cumulatively considerable contribution to this impact.

General Plan Update policies and mitigation measures would reduce cumulative impacts associated with non-attainment criteria pollutants, but not to below a level of significance. Additional mitigation measures as described above for project-level impacts were considered but found to be infeasible. Therefore, Project impacts associated with non-attainment criteria pollutants would remain cumulatively considerable.

C-8 **Significant Effect – Sensitive Receptors:** The FEIR identifies significant impacts to sensitive receptors from exposure to diesel particulate matter.

Mitigation Measures: The mitigation measure identified in the FEIR partially mitigates the significant impact as follows:

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- Air-4.1 requires the County to use the policies set forth in the CARB's Land Use and Air Quality Handbook (CARB 2005) as a guideline for siting sensitive land uses. Implementation of this measure will ensure that sensitive land uses such as residences, schools, day care centers, playgrounds, and medical facilities are sited appropriately to minimize exposure to emissions of TACs.

Facts in Support of Finding: Future development would result in potentially significant emissions of diesel particulate matter. Heavy-duty trucks that utilize diesel as a fuel emit diesel particulate matter. Diesel particulate matter from diesel-fueled engines is responsible for most of the airborne cancer risk from TACs in California. Land development projects are required to comply with AB 2588, APCD Rule 1210, and CARB standards for diesel engines. CARB programs designed to reduce emissions, as well as phase-out of older vehicles, would reduce emissions of these pollutants, but not to less than significant levels. Furthermore, growth would result in the need to develop and expand transportation corridors to allow for the movement of goods within the County; therefore, it is projected that truck trips would increase in the County. Mitigation would reduce impacts to associated with sensitive receptors, but not to below a level of significance.

The following measures were also considered to reduce impacts to sensitive receptors to below significant. However, the County has determined that these measures would be infeasible, as described below. Therefore, the following mitigation measures will not be implemented.

(1) Measure: Require that all off-road or non-road diesel engines, such as those associated with construction or extraction operations, be replaced by an alternative power source, such as electricity.

Rationale for Rejection: This measure would limit which construction contractors would be allowed to work within the County because not all contractors have alternative power source equipment available and the measure could result in a significant increase in the costs of development within San Diego County. Limiting the construction contractors allowed to work within the County would conflict with the Project's objective to reinforce the vitality, local economy, and individual character of existing communities while balancing housing, employment and recreational opportunities. In addition, the County has neither the legal nor the financial authority to monitor and enforce all construction activities within its jurisdiction. In addition, this measure would conflict with CARB's responsibility of regulating emissions from off-road construction equipment.

(2) Measure: Require all diesel trucks that travel on County roads to be equipped with filters or other devices that would limit diesel emissions to below a significant level.

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Rationale for Rejection: This measure is considered to be infeasible because the County cannot monitor all diesel traffic within its jurisdiction due to funding and staffing deficiencies. This would also conflict with CARB's responsibility of regulating emissions from vehicles. Implementing this measure would result in increased public costs, which would conflict with the Project's objective to minimize public costs of infrastructure and services.

None of the Project alternatives would reduce impacts associated to sensitive receptors from exposure to diesel particulate matter to below significant. While the Environmentally Superior alternative would further reduce the impacts to sensitive receptors, this alternative still allows development that would result in impacts that are not mitigated to a level below significant without adopting the measures noted above. In addition, this alternative would not meet the Project objective of recognizing community and stakeholder interests while striving for consensus.

Conclusion: Because the measures listed above have been found to be infeasible; because application of all feasible mitigation and project design measures would not achieve a level of less than significant; and because there are no feasible Project alternatives that would achieve a level of less than significant; impacts to sensitive receptors would remain significant and unavoidable.

Cumulative Impact – Sensitive Receptors: As described above, implementation of the Project would have the potential to significantly impact sensitive receptors due to exposure to diesel particulate matter. In combination with other cumulative projects, the Project would have the potential to result in a significant cumulative impact.

Facts in Support of Finding: Cumulative projects located in the San Diego region would have the potential to result in a cumulative impact to sensitive receptors if, in combination, they would they would expose sensitive receptors to a substantial concentration of TACs or HAPs that would significantly increase cancer risk. Cumulatively, projects in the region would have the potential to result in diesel particulate matter from truck trips. In general, construction of cumulative projects would result in a temporary increase in truck trips to haul construction materials to and from the site. In addition, new industrial or commercial developments would have the potential to result in permanent increases in truck trips to an area due to project operation. The Project would have a cumulatively considerable contribution to this impact.

Mitigation would reduce cumulative impacts to sensitive receptors, but not to below a level of significance. Additional mitigation measures as described above for project-level impacts were considered but found to be infeasible. Therefore, Project impacts to sensitive receptors would remain cumulatively considerable.

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GLOBAL CLIMATE CHANGE

C-9 Significant Direct and Cumulative Effect – Global Climate Change: The FEIR identifies significant impacts associated with the effects of global climate change.

Mitigation Measures: The mitigation measures identified in the FEIR partially mitigate the significant impact as follows:

In addition, the Project includes mitigation measures which will mitigate potentially significant impacts to below significant as follows:

- CC-1.1 is the update of the County Green Building Program to increase the effectiveness of development incentives for resource conservation and energy efficiency through education. Under this program, development will result in less greenhouse gas emissions, which will help the County achieve AB 32 goals.

- CC-1.3 requires that the County work with SANDAG to achieve regional goals in reducing GHG emissions associated with land use and transportation. Although the County has no jurisdiction over vehicle emissions, certain land use decisions can contribute to a reduction in vehicle miles traveled (VMT). By working with SANDAG as it incorporates sustainable communities strategies in its 2050 Regional Transportation Plan, measurable GHG reductions will be achieved consistent with AB 32 strategies.

- CC-1.4 is the review of traffic operations to implement measures that improve flow and reduce idling such as improving traffic signal synchronization and decreasing stop rate and time Vehicle idling leads to unnecessary fuel consumption and GHG emissions. Idling reduction can substantially reduce GHG emissions generated by vehicles on County roads.

- CC-1.5 is the coordination with the San Diego County Water Authority and other water agencies to better link land use planning with water supply planning with specific regard to potential impacts from climate change and continued implementation and enhancement of water conservation programs to reduce demand. This measure also includes County support of water conservation pricing (e.g., tiered rate structures) to encourage efficient water use. The embodied energy in water supply and usage equals 0.0085 kilowatt hours per gallon. Therefore, efficient water usage results in energy savings which has a direct reduction in GHG emissions.

- CC-1.6 requires the County to implement and expand County-wide recycling and composting programs for residents and businesses, and to require commercial and industrial recycling. Landfills are a substantial source of methane emissions in the County. This measure will divert solid waste from landfills in the region and potential GHG produced from landfills. Furthermore, recycling material consumes less energy

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than does the production of raw materials, further contributing to GHG reductions in accordance with AB 32.

- CC-1.7 requires the County incorporate the California ARB's recommendations for climate change CEQA thresholds into the County Guidelines for Determining Significance for Climate Change. These recommendations will include energy, waste, water, and transportation performance measures for new discretionary projects in order to reduce GHG emissions. These thresholds will ensure that future development under the General Plan Update incorporate design features and mitigation measures that minimize or reduce GHG emissions and support achievement of AB 32 goals.

- CC-1.8 is the revision of the County Guidelines for Determining Significance based on the Climate Change Action Plan. The revisions will include guidance for proposed discretionary projects to achieve greater energy, water, waste, and transportation efficiency. This measure will ensure that future development under the General Plan Update is consistent with the Climate Change Action Plan which identifies the County's GHG reduction strategies for achieving AB 32 goals.

- CC-1.9 requires the County to coordinate with APCD, SDG&E, and the California Center for Sustainable Energy to research and possibly develop a mitigation credit program. Under this program, mitigation funds will be used to retrofit existing buildings for energy efficiency and to reduce GHG emissions.

- CC-1.10 is the implementation of the County Groundwater Ordinance, Watershed Protection Ordinance (WPO), Resource Protection Ordinance (RPO), and Multiple Species Conservation Program (MSCP), as well as preparation of the MSCP Plans for North and East County, in order to further preserve wildlife habitat and corridors, wetlands, watersheds, groundwater recharge areas and other open space that provide carbon sequestration benefits. The implementation of these regulations will also restrict the use of water for cleaning outdoor surfaces and vehicles. The WPO also implements low-impact development practices that maintain the existing hydrologic character of the site to manage storm water and protect the environment. (Retaining storm water runoff on-site can drastically reduce the need for energy-intensive imported water at the site.) These regulations serve to minimize development footprint and maximize natural resource preservation, thereby resulting in less GHG emissions and better capture/storage of carbon.

- CC-1.11 revises the Water Conservation Ordinance Landscape Section to further promote water conservation. These measures include:
    - The creation of water-efficient landscapes and use water-efficient irrigation systems and devices, such as soil moisture-based irrigation controls.
    - The use of reclaimed water for landscape irrigation.

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- Restricting watering methods (e.g., prohibit systems that apply water to non-vegetated surfaces) and control runoff.
- Providing education about water conservation and available programs and incentives.

Water usage in this region is extremely energy intensive; therefore, implementation of water conservation requirements such as these will result in direct energy and GHG reductions in accordance with AB 32 strategies.

- CC-1.12 requires the County coordinate with resource agencies, CALFIRE, and fire districts throughout the County to minimize current wildfire risks and to plan for the potential increase in future risk that may result from Climate Change. Wildlands fires are sources of methane and are also considered to be a product of the changing climate. Loss of trees and vegetation also eliminates natural means for reducing GHG emissions through photosynthesis. This measure ensures that the County will continue efforts to prevent wildfires both for human safety and for the health of the environment.

- CC-1.13 requires the County implement and revise as necessary, the Regional Trails Plan and Community Trails Master Plan, connecting parks and publicly accessible open space through shared pedestrian/bike paths and trails which encourage and facilitate walking and bicycling. By expanding opportunities for alternative transportation, the County can reduce GHG emissions associated with vehicle miles traveled.

- CC-1.14 requires the County to provide public education and information about options for reducing greenhouse gas emissions. In addition to addressing land development, education should also address purchasing, conservation, and recycling. Through public awareness and education, more people can be made aware of how GHG emissions are created at home. With this knowledge, much can be done to reduce day to day emissions which will help in the County's goal to achieve AB 32 targets.

- CC-1.15 is the reduction of VMT and encouragement of alternative modes of transportation through implementation of the following measures:
  - During Community Plan updates, establish policies and design guidelines that: encourage commercial centers in compact walkable configurations and discourage "strip" commercial development
  - Expand community bicycle infrastructure.
  - Revise the Off-Street Parking Design Manual to include parking placement concepts that encourage pedestrian activity and concepts for providing shared parking facilities.
  - Establish comprehensive planning principles for transit nodes such as the Sprinter Station located in North County Metro.
  - Continue to locate County facilities near transit facilities whenever feasible.

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- Coordinate with SANDAG, Caltrans, and tribal governments to maximize opportunities to locate park and ride facilities.
- Continue to coordinate with SANDAG, Caltrans, and transit agencies to expand the mass transit opportunities in the unincorporated county and to review the location and design of transit stops. Establish a DPLU transit coordinator to ensure land use issues are being addressed.
- Update the Zoning Ordinance to require commercial, office, and industrial development to provide preferred parking for carpools, vanpools, electric vehicles, and flex cars.
- By incorporating more alternative transportation methods, including both public and private, and designing development with the emphasis on walkability and transit nodes, less VMT will be necessary to conduct day to day activities. This will reduce daily VMT and thus, will reduce GHG emissions in accordance with AB 32 strategies.

- CC-1.16 requires the County to develop and implement a Strategic Energy Plan to increase energy efficiency in existing County buildings and set standards for any new County facilities that will ultimately reduce GHG emissions. This will include implementation of the following measures as will be detailed within the Plan:
  - Improve energy efficiency within existing operations through retrofit projects, updated purchasing policies, updated maintenance/operations standards, and education.
  - Improve energy efficiency of new construction and major renovations by applying design criteria and participating in incentive programs.
  - Provide energy in a reliable and cost-effective manner and utilize renewable energy systems where feasible.
  - Monitor and reduce energy demand through metering, building controls, and energy monitoring systems.
  - Increase County fleet fuel efficiency by acquiring more hybrid vehicles, using alternative fuels, and by maintaining performance standards for all fleet vehicles.
  - By implementing the Strategic Energy Plan, an umbrella practice towards energy efficiency throughout County facilities can be achieved. By improving existing facilities with energy efficiency retrofits and incorporating them in new construction, the County can achieve an overall greenhouse gas emissions reduction. Furthermore, by implementing such standard best practices, the efficiency mechanisms may further extend to all areas of the region and to County staff who will continue these practices at home. This will improve the County's overall GHG reduction and help to achieve AB 32 targets.

- CC-1.17 is the preparation and implementation of a County Operations Recycling Program. This will include implementation of the following measures as will be detailed within the Program:

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- Reuse and recycle construction and demolition waste (including, but not limited to, soil, vegetation, concrete, lumber, metal, and cardboard).
- Provide interior and exterior storage areas for recyclables and green waste and adequate recycling containers located in public areas.
- Recover by-product methane to generate electricity.
- Provide education and publicity about reducing waste and available recycling services.
- Providing recycling collection containers throughout County facilities reduces the difficulty for collection. Requiring construction and demolition waste to be alternatively disposed of further reduces waste put in the landfills, which reduces the production of methane. In addition, recycling efforts reduce the quantity of energy necessary to produce goods from a raw state. All of these steps taken by the County will reduce GHG emissions, helping to achieve AB 32 goals.

- CC-1.18 is the preparation and implementation of a County Operations Water Conservation Program. Reductions in water usage result in direct reductions of GHG

- CC-1.19 requires the County to make revisions to the Zoning Ordinance to facilitate recycling salvaged concrete, asphalt, and rock. Such recycling efforts reduce GHG emissions and help ensure that AB 32 goals are met.

While there are already a significant number of federal, state, and local regulations, policies, and programs to reduce GHG emissions, the Project includes policies in the Conservation and Open Space Element that further address greenhouse gas emissions. The relevant policies are COS-10.7, COS-15.1, COS-15.2, COS-15.3, COS-17.1, COS-17.5, COS-18.2, COS-20.1, COS-20.2, and COS-20.4. Policy COS-10.7 encourages the installation and operation of construction and demolition (C&D) debris recycling facilities as an accessory use permitted (or otherwise authorized) mining facilities to increase the supply of available mineral resources. Policy COS-15.1 requires that new buildings be designed and constructed to incorporate techniques and materials that maximize energy efficiency, incorporate the use of sustainable resources and recycled materials, and reduce emissions of GHGs and toxic air contaminants. Policy COS-15.2 encourages retrofit of existing buildings to incorporate architectural features, heating and cooling, water, energy, and other design elements that improve their environmental sustainability and reduce GHG emissions. Policy COS-15.3 requires all new County facilities, as well as renovation and expansion of existing County buildings, to meet identified "green building" programs that demonstrate energy efficiency, energy conservation, and renewable technologies. Policy COS-17.1 promotes sustainable solid waste management by requiring reduction, reuse, or recycling of all types of solid waste that is generated. Policy COS-17.5 promotes efficient methods for methane recapture in landfills and other sustainable strategies to reduce the release of GHG emissions from waste disposal or management sites and to generate additional energy such as

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electricity. Policy COS-18.2 encourages use of methane sequestration and other sustainable strategies to produce energy and/or reduce GHG emissions from waste disposal or management sites. Policy COS-20.1 requires preparation, maintenance, and implementation of a climate change action plan with a baseline inventory of GHG emissions from all sources, GHG emissions reduction targets and deadlines, and enforceable GHG emissions reduction measures. Policy COS-20.2 is the preparation and implementation of a program to monitor GHG emissions attributable to development, transportation, infrastructure, and municipal operations and periodically review the effectiveness of and revise existing programs as necessary to achieve GHG emission reduction objectives. Policy COS-20.4 promotes public education by requiring the County to furnish materials and programs that educate and provide technical assistance to the public, development professionals, schools, and other parties regarding the importance and methods for sustainable development and the reduction of GHG emissions. Adherence to these policies will reduce impacts associated with greenhouse gas emissions.

Facts in Support of Finding: Compliance with General Plan policies and General Plan Update PEIR mitigation measures would reduce the extent and severity of climate change-related impacts to the land uses developed under the proposed Project. However, the Project areas provide a greater number of natural, physical, and environmental constraints than urbanized areas in the County, a higher occurrence of sensitive plant or animal species, and limitations in adequate provision of infrastructure and utilities or public services (e.g., fire protection, water supply). Some of these impacts, such as those related to water supply, wildland fires and ecosystems are expected to be more severe for the proposed Project as compared to the 2011 General Plan due to the proposed development in and around the Cleveland National Forest which is comprised of more abundant sensitive natural resources in comparison to urbanized areas of the County.

The General Plan Update policies and mitigation measures incorporated into the Project would reduce impacts, but not to below a level of significance.

The following measures were also considered to reduce impacts associated with wildland fires to below significant. However, the County has determined that these measures would be infeasible, as described below. Therefore, the following mitigation measures will not be implemented.

(1) Measure: Require both discretionary and ministerial projects, within the FCI Lands GPA areas, to exceed 2013 Title 24 building standards and other GHG emission reduction design features to meet quantitative reduction targets consistent with California GHG reduction goals.

Rationale for Rejection: As explained below, this measure has been deemed infeasible due to its social and economically inequitable implementation, and because it conflicts

with the Project objective to minimize public costs and infrastructure: The measure would be socially and economically inequitable because the FCI Lands GPA significantly reduces the overall development potential; however, this measure would require that discretionary and ministerial projects within the Project area comply with additional requirements, beyond those of projects outside the Project area. Therefore, while the development potential of a parcel would be reduced under the FCI GPA, discretionary and ministerial projects within the Project area would be subject to more onerous restrictions than other projects.

Current land use designations for the FCI lands (the No Project alternative) are projected to result in 15,094 dwelling units. The proposed Project land use designations are projected to result in 6,245 dwelling units. The reduction in dwelling units (8,849 fewer dwelling units at buildout of the land use maps) that result from the proposed Project General Plan Amendment is unique in this regard because most GPAs seek to increase development potential.

As shown in Table 1 below, the proposed Project suggests a more intensive land use designation for only 207 of the 4,083 parcels included within the Project areas compared to current designations. There is no change in land use designation for 2,496 parcels and a reduction in land use intensity for the remaining 1,380 parcels. Therefore, the proposed Project either does not change or would reduce the land use intensity for 95% of parcels (95.9% of the Project area acreage) within the Project area. That is, without any additional development potential, projects would be required to implement costly building and design standards that exceed current state recommendations and requirements, and the effectiveness of which to further reduce greenhouse gas emissions has not been conclusively determined, without realizing increased development. In fact, over one-third of the parcels within the Project areas would lose development potential due to the amended (less intense) land use designations of the proposed Project.

TABLE 1. COMPARISON OF INTENSITY OF LAND USE DESIGNATIONS PROPOSED PROJECT TO NO PROJECT ALTERNATIVES

Dwelling Units (DUs) at Buildout: ***Existing General Plan compared to Proposed Project***	**# Parcels**	**% Total (Parcels)**	**Acres**	**% Total (Acreage)**
Proposed Project allows more DUs	207	5.1%	2,950	4.1%
Same number of DUs at buildout	2,496	61.1%	9,688	13.5%
Proposed Project allows less DUs	1,380	33.8%	59,077	82.4%
TOTAL	**4,083**	**100.0%**	**71,715**	**100.0%**

Source: County Planning & Development Services

The annual 900 metric ton carbon dioxide equivalent (MT CO2e) screening level referenced in the CAPCOA white paper (http://www.capcoa.org/wp-content/

uploads/downloads/2010/05/CAPCOA-White-Paper.pdf) is being used by the County as a conservative criterion for determining the size of projects that would require further analysis and development of project-specific mitigation with regard to climate change. The CAPCOA white paper reports that the 900 metric ton screening level would capture more than 90% of development projects, allowing for mitigation towards achieving the State's GHG reduction goals. Table 2 shows the sizes of projects that would generally require a climate change analysis and mitigation.

TABLE 2 PROJECT SIZES THAT WOULD TYPICALLY REQUIRE A CLIMATE CHANGE ANALYSIS[1]

Project Type[2]	Project Size Equivalency
Single Family Residential	≥50 units
Apartments/Condominiums	≥70 units
General Commercial Office Space	≥35,000 square feet
Retail Space	≥11,000 square feet
Supermarket/Grocery Space	≥6,300 square feet

1) A determination on the need for a climate change analysis for project types not included in the table will be made on a case-by-case basis considering the 900 metric ton criterion.

2) A project with a combination of types may demonstrate compliance with the screening threshold through addition of the ratios of each contribution by the associated equivalency threshold.

As can be seen in Table 2 above, only residential projects resulting in over 50 residential dwelling units (barring unique circumstances) are required to conduct a climate change analysis thereby quantifying project emissions and determining impact significance for the target emission horizon years of 2020, 2030 and 2050.

Table 3 shows the number of parcels and acreage that would be required to prepare a climate change analysis based on the proposed Project land use designations in accordance with the criteria established by Table 2.15-5.

As shown in Table 3, only five parcels (132 acres), or 1.0% of the total number of parcels is proposed for a land use intensity that would allow subdivision into 50 or more lots. Three of those five parcels would allow 70 dwelling units or more, which would require a climate change analysis for projects constructing apartments or condominiums.

Office, retail, and supermarket/grocery spaces would be allowed only in parcels with a Rural Commercial designation. The criteria for commercial spaces in Table 2.15-5 are based on square feet rather than acres. Specific Floor Area Ratios (FAR) are used to convert the acreage of each parcel into the applicable square footage. Based on the criteria that County uses to require a climate change analysis for commercial uses, 6,300 SF (supermarket/grocery space) is the smallest structure that triggers the need for a climate change analysis. As shown in Table 2.15-6, 29 parcels would allow supermarket/grocery spaces of 6,300 square feet or larger—17 parcels in areas where imported water infrastructure is either available or planned and 12 parcels in areas where imported water is not currently available, or planned to be available. This equates to 0.7 percent of total parcels.

The remaining 4,061 parcels (if imported water is required) or 4,049 parcels (if imported water is not required) do not possess the development potential that would trigger the 900 metric ton screening level.

TABLE 3. PARCELS THAT WOULD ALLOW PROJECT SIZES THAT WOULD REQUIRE A CLIMATE CHANGE ANALYSIS PER TABLE 2 CRITERIA[1]

Development Process	# Parcels	% Total (Parcels)	Acres	% Total (Acreage)
Single Family Residential				
Climate Change Analysis (TM > 50 lots)	5	0.1%	132	0.2%
No Climate Change Analysis (TM < 50 lots)	4,078	99.9%	71,583	99.8%
Apartments / Condominiums				
Climate Change Analysis (TM > 70 units)	3	0.1%	115	0.2%
No Climate Change Analysis (TM < 70 units)	4,080	99.9%	71,600	99.8%
General Commercial Office Space[2]				
Climate Change Analysis (≥ 35,000 SF)				
Imported water (available/planned)	15	0.4%	142	0.2%
No Imported water is available	6	0.1%	30	0.0%
No Climate Change Analysis (< 35,000 SF)	4,062	99.5%	71,543	99.8%
Retail Space[1]				
Climate Change Analysis (≥ 11,000 SF)				
Imported water (available/planned)	17	0.4%	146	0.2%
No Imported water is available	11	0.3%	39	0.1%
No Climate Change Analysis (< 11,000 SF)	4,055	99.3%	71,530	99.7%
Supermarket / Grocery Space[3]				
Climate Change Analysis (≥ 6,300 SF)				
Imported water (available/planned)	17	0.4%	146	0.2%
No Imported water is available	12	0.3%	39	0.1%
No Climate Change Analysis (< 6,300 SF)	4,054	99.3%	71,530	99.7%

Source: County Planning & Development Services

Notes:

1) Based on proposed Project land use designations
2) Assumes a 0.35 Floor Area Ratio (FAR)
3) Assumes a 0.25 FAR

2) Measure: Mitigation requiring project-specific reduction percentages for projects identified using the CAPCOA white paper criteria.

   Rationale for Rejection: As explained below, this measure has been determined to be infeasible for the following reasons:

   - Requiring project-specific reductions would add development costs and requirements, which could potentially make development, although allowed by the Land Use Map, infeasible. This would not be consistent with General Plan Land Use Policy LU-1.9, Achievement of Planned Densities. For example, reductions in land

use intensity are frequently advocated to reduce emissions or vehicle miles, and such reductions would impact the feasibility of development, which would be inconsistent with Policy LU-1.9.

LU-1.9 Achievement of Planned Densities*. Recognizing that the General Plan was created with the concept that subdivisions will be able to achieve densities shown on the Land Use Map, planned densities are intended to be achieved through the subdivision process except in cases where regulations or site specific characteristics render such densities infeasible*.

- Effectual mitigation to reduce GHG emissions to less than a significant level for the horizon years of 2030 and 2050 would need to be implemented for all projects within the Project areas, even those project applications that would normally be processed as ministerial actions. Furthermore, the State has not established a 'project-level emission reduction' threshold to determine the project-specific emission reduction percentage necessary for individual projects to meet the 2030 statewide emission reduction target of 40% below 1990 emissions.

- Requiring additional mitigation and analysis for future development projects beyond what is currently required for like projects outside the Project areas is not socially or economically equitable for those properties located within the Project areas because property owners within the Project area would be subject to development costs and requirements beyond those imposed on other property owners. Further, the proposed Project would either decrease, or retain the current development potential for 95% of the parcels (refer to Table 2.15-4). The reduction of development potential translates into a reduction of future projected GHG emissions.

    - 34% of the Project area parcels would lose development potential under the proposed Project, and

    - 61% of Project area properties would not receive any change in development potential under the proposed Project.

Because the measure listed above has been found to be infeasible by the County and would not be implemented, impacts related to compliance with California GHG reduction goals would remain significant and unavoidable.

It should be noted that the County is undertaking the preparation of a Climate Action Plan (CAP) that will address long-term GHG emissions County-wide. The CAP will accommodate future growth under the proposed Project and other reasonably foreseeable GPAs in the County. The CAP is anticipated to provide streamlining opportunities for projects that are determined to be consistent with a "plan for the reduction of greenhouse gases" (CEQA Guidelines Section 15183.5).

Implementation of the proposed Project will reduce the GHG emissions in comparison to the current land use designations. However, important factors are not currently known: the effectiveness of regulatory actions already adopted as part of the implementation of the Global Warming Solutions Act of 2006; and the potential for application of new

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regulations and their effectiveness; the cost and feasibility of certain policies that may be mandated as mitigation are not known. Therefore, GHG impacts would not be feasibly mitigated to adopted GHG reduction target levels for 2020, 2030 and 2050.

None of the Project alternatives would reduce impacts associated with climate change to below a significant level. While the Environmentally Superior alternative would reduce the impacts, this alternative still allows development that would result in impacts that are not mitigated to a level below significant without adopting the measures noted above. In addition, this alternative would not meet the Project objective of recognizing community and stakeholder interests while striving for consensus.

Conclusion: Because the measures listed above have been found to be infeasible; because application of all feasible mitigation and Project design measures would not achieve a level of less than significant; and because there are no feasible Project alternatives that would achieve a level of less than significant; impacts associated with global climate change would remain significant and unavoidable.

HAZARDS AND HAZARDOUS MATERIALS

C-10 Significant Effect – Wildland Fires: The FEIR identifies significant impacts associated with exposure of people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.

Mitigation Measures: The mitigation measures identified in the FEIR partially mitigate the significant impact as follows:

- Haz-4.1 requires the County to identify and minimize potential fire hazards for future development by using and maintaining a database that identifies fire prone areas, locating development away from Fire Hazard areas whenever practicable, and adhering to the County Guidelines for Determining Significance for Wildland Fires & Fire Protection and applying appropriate mitigation when impacts are significant. Implementation of these measures will typically prevent future placement of people and structures near wildland fire hazards.

- Haz-4.2 requires the County to conduct effective and environmentally sensitive brush management measures such as: addressing habitat-specific fire controls within Resource Management Plans; implementation of the Weed Abatement Ordinance and enforcing proper techniques for maintaining defensible space around structures; coordination with the local fire authority having jurisdiction to ensure that district goals for fuel management and fire protection are being met; and recognizing the Memorandum of Understanding between the wildlife agencies and fire authorities that guides the abatement of flammable vegetation without violating environmental regulations for habitat protection. These actions will help minimize fire hazard losses while also avoiding significant impacts to environmental resources.

- Haz-4.3 requires the County to enforce and comply with Building and Fire Code to ensure there are adequate fire service levels; and require site and/or building designs that incorporate features that reduce fire hazards. It also includes implementation of General Plan Regional Category map and Land Use Maps, which typically show lower densities in wildland areas. This effort can substantially reduce potential losses in the event of wildland fire.

- Haz-4.4 requires the County to create a Conservation Subdivision Program that facilitates conservation-oriented, fire-safe, project design through changes to the Subdivision Ordinance, Resource Protection Ordinance, Zoning Ordinance, Groundwater Ordinance, and other regulations as necessary. This program is included in the Project and will result in subdivision designs with improved fire protection.

The Project also includes policies in the Land Use, Safety and Conservation and Open Space Elements that address wildland fire impacts. The relevant policies are: LU-6.11, LU-11.2, S-3.1, S-3.2, S-3.3, S-3.4, S-3.6, S-4.1, and COS-18.3. These policies would direct development away from hazardous wildfire areas as much as possible. For unavoidable development in wildland areas, the policies require that development be located, sited, designed and constructed to enhance defensibility, to minimize the risk of structural loss and life safety resulting from wildland fires, and to be located near available emergency services. Adherence to these policies will further reduce impacts associated with wildland fires.

Facts in Support of Finding: In addition to the potential loss of life and property, wildfires may result in the loss or permanent change of natural resources. Although natural conditions make wildfires common in San Diego County, locating residential land uses adjacent to or within a wildland-urban interface can result in increased fire related risk to people and structures. The vast majority of unincorporated San Diego County is ranked as having High or Very High fire hazard severity. Approximately 575,434 acres of the unincorporated County are considered to be within wildland-urban interface areas. Approximately 47,737 acres of land within the Project area are designated as Wildland Urban Interface Areas.

The General Plan Update policies and mitigation measures incorporated into the Project would reduce impacts associated with wildland fires, but not to below a level of significance.

The following measures were also considered to reduce impacts associated with wildland fires to below significant. However, the County has determined that these measures would be infeasible, as described below. Therefore, the following mitigation measures will not be implemented.

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(1) Measure: Require development guidelines to be prepared and incorporated into all community plans that would limit the amount of future development in order to reduce hazards associated with wildland fires.

Rationale for Rejection: Restrictions on the type or amount of development within a community would conflict with areas identified for increased growth under the proposed Project. Therefore, this measure would be infeasible because community plans are required to be consistent with the adopted 2011 General Plan. The measure would also conflict with goals of the Housing Element to provide sufficient housing stock, and would not achieve one of the primary objectives of the proposed Project, which is to accommodate a reasonable amount of growth.

(2) Measure: Substantially reduce planned densities in areas of concern.

Rationale for Rejection: This measure would be considered infeasible because it would result in significant growth restrictions in areas identified for increased growth under the proposed Project. As such, this measure would conflict with goals of the Housing Element to provide sufficient housing stock, and would not achieve one of the primary objectives of the proposed Project which is to accommodate a reasonable amount of growth.

(3) Measure: Approve development only within unincorporated County areas that are considered to have a moderate fire hazard.

Rationale for Rejection: This measure would be infeasible because the majority of the unincorporated County is classified as having a higher than moderate risk for wildland fires. This measure would result in significant growth restrictions in areas identified for increased growth under the proposed Project. As such, this measure would conflict with goals of the Housing Element to provide sufficient housing stock, and would not achieve one of the primary objectives of the proposed Project, which is to accommodate a reasonable amount of growth.

(4) Measure: Require extensive fuel modification around existing and future development in wildland areas.

Rationale for Rejection: This measure would be infeasible because it would substantially impact the environment by damaging biological resources, altering drainage patterns, causing erosion, and modifying the visual landscape. This would conflict with the objective to protect natural resources and habitat that uniquely define the County's character and ecological importance.

None of the Project alternatives would reduce impacts associated with wildland fires to below significant. While the Environmentally Superior alternative would further reduce the wildfire hazard impacts, this alternative still allows development that would result in

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impacts that are not mitigated to a level below significant without adopting the measures noted above. In addition, this alternative would not meet the Project objective of recognizing community and stakeholder interests while striving for consensus.

Conclusion: Because the measures listed above have been found to be infeasible; because application of all feasible mitigation and Project design measures would not achieve a level of less than significant; and because there are no feasible Project alternatives that would achieve a level of less than significant; impacts associated with wildland fires would remain significant and unavoidable.

Cumulative Impact – Wildland Fires: As described above, implementation of the Project would have the potential to result in significant impacts associated with wildland fires. In combination with other cumulative projects, the Project would have the potential to result in a significant cumulative impact.

Facts in Support of Finding: Southern California has a history of experiencing frequent and intensive wildland fires, which have exposed people and structures to a potentially significant loss of life and property. Some cumulative projects would occur in areas that are considered high or very high fire hazard severity zones. Implementation of the proposed Project would result in land uses that allow residential, commercial and industrial development in areas that are prone to wildland fires. Implementation of the Project would result in a potentially significant impact from the exposure of people or structures to a significant risk or loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residents are intermixed with wildlands.

General Plan policies and Project mitigation measures would reduce cumulative impacts associated with wildland fires, but not to below a level of significance. Additional mitigation measures as described above for Project-level impacts were considered but found to be infeasible. Therefore, Project impacts associated with wildland fires would remain cumulatively considerable.

HYDROLOGY AND WATER QUALITY

C-11 Significant Effect – Water Quality Standards and Requirements: The FEIR identifies significant impacts that potentially contribute to violation of water quality standards or otherwise degrade water quality.

Mitigation Measures: The mitigation measures identified in the FEIR partially mitigate the significant impact as follows:

- Hyd-1.1 requires the County to update and implement the County of San Diego's Jurisdictional Urban Runoff Management Program (JURMP). The JURMP ensures

the County's compliance with the Municipal Stormwater Permit, thereby minimizing potential violation of standards or degradation of water quality.

- Hyd-1.2 requires the County to implement, and revise as necessary, the Watershed Protection Ordinance. In addition, the County must encourage the removal of invasive species and restore natural drainage systems. This measure reduces potential adverse effects of polluted runoff discharges on waters.

- Hyd-1.3 requires the County to establish and implement low impact development (LID) standards for new development to minimize runoff and maximize infiltration. This will reduce potential impacts to the quality of surface or groundwater.

- Hyd-1.4 requires the County to implement, and revise as necessary, the Stormwater Standards Manual. This manual requires application of appropriate measures for land use with a high potential to contaminate surface water or groundwater resources. As such, this measure will reduce potential contribution to any violations of water quality standards from land use projects permitted by the County.

- Hyd-1.5 is the utilization of the County Guidelines for Determining Significance for Surface Water Quality, Hydrology, and Groundwater Resources to identify adverse environmental effects. Application of these guidelines help County staff to identify and mitigate potential water quality impacts associated with public or private projects in the County.

- Hyd-1.6 requires the County to implement, and revise as necessary, Board Policy I-84 requiring that discretionary project applications include commitments from available water and sanitation districts. This measure ensures early coordination with utility providers and helps identify water quality standards and regulations that must be met.

- Hyd-1.7 is the County planning staff participation in the review of wastewater facility long range and capital improvement plans. This will reduce potential violation of water quality standards in place or being updated by planning staff and will also allow for identification of land use conflicts that may result in water quality impacts.

- Hyd-1.8 is the requirement for a Major Use Permit when projects propose wastewater facilities. This will ensure that such facilities are adequately sized and that they meet applicable standards and regulations for waste discharge.

- Hyd-1.9 requires the County to review septic system design, construction, and maintenance in cooperation with the Regional Water Quality Control Board (RWQCB) through the Septic Tank Permit Process. This coordination will minimize potential violation of water quality standards or waste discharge requirements since the RWQCP oversees the County's permitting process.

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- Hyd-1.10 requires the County to coordinate with the State Water Resources Control Board to develop statewide performance and design standards for conventional and alternative On-site Wastewater Treatment Systems (OWTS). When alternative OWTS are permitted, this step will help prevent potential conflicts with applicable standards and regulations.

The Project also includes policies in the Land Use and Conservation and Open Space Elements that address water quality standards. The relevant policies are: LU-6.5, LU-6.9, LU-14.1, LU-14.2, LU-14.3, LU-14.4, COS-4.2, COS-4.3, COS-4.4, COS-5.2, COS-5.3, and COS-5.5. These policies will require that future development implement sustainable stormwater management techniques and conform with topography, require coordination with wastewater agencies or districts, require adequate disposal of wastewater, require wastewater treatment facilities serving more than one private property owner to be operated and maintained by a public agency, prohibit sewer facilities that would induce unplanned growth, require drought efficient landscaping for certain use types, and require minimization of impervious surfaces. Adherence to these policies will further reduce impacts associated with water quality standards and waste discharge requirements from future development.

Facts in Support of Finding: The development of future land uses as designated in the proposed Project would contribute pollutants such as sediments, hydrocarbons and paints in quantities that would otherwise significantly degrade surface water quality. It is also anticipated that non-point source pollutants, caused from the development of future land uses as designated in the proposed Project, would otherwise degrade surface water quality. General Plan Update policies and mitigation measures would reduce impacts to water quality standards, but not to below a level of significance.

The following measures were also considered to reduce impacts to water quality standards to below significant. However, the County has determined that these measures would be infeasible, as described below. Therefore, the following mitigation measures will not be implemented.

(1) Measure: Provide a water treatment system that reduces constituents to below the maximum contaminant level (MCL) in all groundwater impaired areas.

Rationale for Rejection: This measure would require treatment plants in many areas of the County, which would potentially result in numerous environmental impacts and conflict with the Project objective to minimize public costs and infrastructure.

(2) Measure: In groundwater quality impaired areas, require water to be imported from other sources.

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Rationale for Rejection: This measure would not be feasible based on the extensive infrastructure needed to import water to impaired areas. To provide such infrastructure would conflict with the Project objectives to minimize public costs of infrastructure and services and correlate their timing with new development.

(3) Measure: In groundwater quality impaired areas, place a moratorium on building permits and development applications.

Rationale for Rejection: This measure would be inconsistent with the land use designations proposed for the Project. It would also conflict with goals of the Housing Element to provide sufficient housing stock and would not achieve one of the primary objectives of the Project which is to accommodate a reasonable amount of growth.

None of the Project alternatives would reduce impacts associated with water quality standards and requirements to below significant. While the Environmentally Superior alternative would further reduce water quality impacts, this alternative still allows development that would result in impacts that are not mitigated to a level below significant without adopting the measures noted above. In addition, this alternative would not meet the Project objective of recognizing community and stakeholder interests while striving for consensus.

Conclusion: Because the measures listed above have been found to be infeasible; because application of all feasible mitigation and Project design measures would not achieve a level of less than significant; and because there are no feasible Project alternatives that would achieve a level of less than significant; impacts to water quality standards would remain significant and unavoidable.

Cumulative Impact – Water Quality Standards and Requirements: As described above, implementation of the proposed Project would have the potential to contribute pollutants that affect the quality of surface water or groundwater. In combination with other cumulative projects, the Project would have the potential to result in a significant cumulative impact.

Facts in Support of Finding: Construction and development associated with cumulative regional land use projects would contribute both point and non-point source pollutants to downstream receiving waters that have the potential to violate water quality standards. For example, projects proposed in Mexico are not subject to water quality discharge requirements and would result in water quality violations in shared watershed management areas. Such projects may result in a potentially significant cumulative impact to water quality standards and requirements.

As discussed above, the Project would contribute both non-point and point source pollutants in quantities that have the potential to violate water quality standards. General

Plan Update policies and mitigation measures would reduce cumulative impacts to water quality, but not to below a level of significance. Additional mitigation measures as described above for project-level impacts were considered but found to be infeasible. Therefore, Project impacts to water quality standards and requirements would remain cumulatively considerable.

C-12 Significant Effect – Groundwater Supplies and Recharge: The FEIR identifies significant impacts that would substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level.

Mitigation Measures: The mitigation measures identified in the FEIR partially mitigate the significant impact as follows:

- Hyd-1.1 requires the County to update and implement the County of San Diego's Jurisdictional Urban Runoff Management Program (JURMP). The JURMP ensures the County's compliance with the Municipal Stormwater Permit. This compliance with the permit will minimize impervious surfaces that may interfere with groundwater recharge.

- Hyd-1.2 requires the County to implement, and revise as necessary, the Watershed Protection Ordinance. In addition, the County must encourage the removal of invasive species and restore natural drainage systems. This measure reduces potential impervious area which would interfere with groundwater recharge.

- Hyd-1.3 requires the County to establish and implement low impact development (LID) standards for new development to minimize runoff and maximize infiltration. This will reduce potential impacts to groundwater recharge.

- Hyd-1.4 requires the County to implement, and revise as necessary, the Stormwater Standards Manual. This manual requires application of appropriate measures to facilitate infiltration of stormwater and allow groundwater recharge.

- Hyd-1.5 is the utilization of the County Guidelines for Determining Significance for Surface Water Quality, Hydrology, and Groundwater Resources to identify adverse environmental effects. Application of these guidelines help County staff to identify and mitigate potential groundwater impacts associated with public or private projects in the County.

- Hyd-2.1 is the implementation, and revision when necessary, of Board Policy I-84 requiring that discretionary project applications include commitments from available water districts. This measure helps reduce unnecessary reliance on groundwater for land use projects. Hyd-2.1 also requires implementation of Board Policy G-15, which directs the conservation of water at County facilities.

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- Hyd-2.2 is the implementation of the Groundwater Ordinance to balance groundwater resources with new development. This ordinance minimizes impacts to groundwater supplies from applicable projects. Hyd-2.2 also includes revision of the Ordinance Relating to Water Conservation for Landscaping (currently Zoning Ordinance Sections 6712 through 6725) to further water conservation through the use of recycled water.

- Hyd-2.3 requires the County to establish a water credits program between the County and the Borrego Water District to provide a streamlined and consistent process for the permanent cessation of outdoor water intensive uses such as irrigated agricultural or golf course land. This will help reduce impacts to groundwater supplies in the Borrego community.

- Hyd-2.4 requires the County to coordinate with the San Diego County Water Authority and other water agencies to correlate land use planning with water supply planning and implementation and enhancement of water conservation programs. This cooperation can help minimize adverse effects of future development on water supplies.

- Hyd-2.5 is the implementation, and revision when necessary, of the Resource Protection Ordinance and Policy I-68 Proposed Projects in Flood Plains / Floodways to restrict development in flood plains / floodways. Such development could otherwise substantially interfere with groundwater recharge.

The Project also includes policies in the Land Use and Conservation and Open Space Elements that address groundwater supplies and recharge. The relevant policies are: LU-8.1, LU-8.2, LU-13.1, LU-13.2, COS-4.1 through COS-4.4, and COS-5.2. These policies require that land use densities relate to groundwater sustainability and resources, facilitate coordination between land use planning and water infrastructure planning, require water-supply commitments for new development, and encourage water conservation and groundwater recharge. Adherence to these policies will further reduce impacts associated with groundwater supply from future development.

Facts in Support of Finding: There are multiple areas in the unincorporated County that are currently experiencing groundwater supply impacts. Implementation of the Project would allow land uses and development to occur in these areas, thereby worsening an already unsustainable groundwater supply. At maximum build-out of land uses proposed in the Project, groundwater supply impacts would occur in: 1) areas that experience a 50 percent reduction of groundwater in storage; 2) areas that may be currently impacted by the combined drawdown of existing wells; and 3) areas that experience a high frequency of low well yield. General Plan Update policies and mitigation measures would reduce potential impacts to groundwater supplies and recharge, but not to below a level of significance.

The following measures were also considered to reduce impacts to groundwater supplies and recharge to below significant. However, the County has determined that these measures would be infeasible, as described below. Therefore, the following mitigation measures will not be implemented.

(1) Measure: In areas with potentially impacted groundwater supplies, require all proposed discretionary projects to share well water through a well sharing agreement.

Rationale for Rejection: This mitigation measure would prove infeasible or enforceable because such agreements would only apply to current developers and would not be binding on existing groundwater uses or future owners of the affected properties. In addition, the County lacks authority and control over groundwater rights.

(2) Measure: In areas with inadequate groundwater supply, project proponents shall be required to secure water contracts with other groundwater providers to import water through the construction of new infrastructure from another groundwater basin that is not impacted, prior to the issuance of discretionary permits.

Rationale for Rejection: This mitigation measure is considered to be infeasible because piping in groundwater from an off-site source would be a complex and costly process which would involve any number of issues, including: 1) water rights issues; 2) need to obtain proper permits to encroach on public roadways or other private properties to convey the water; 3) potential need to the create a new water district/water company; and 4) accelerated deterioration of the groundwater basin that is providing the imported water. Additionally, requiring complex piping to import groundwater from an alternative location has the potential to result in multiple secondary environmental impacts, including growth induction, cultural resources, biological resources, and hydrology/water quality. Although some water districts within the unincorporated County have imported water from another groundwater basin in the past, requiring that all development obtain water contracts, as described above, would result in significant cost increases for developers and water districts. Implementing this mitigation measure would also contradict the proposed objective to promote environmental stewardship that protects the range of natural resources and habitats that uniquely define the County's character and ecological importance because it would result in multiple secondary environmental impacts to both unincorporated County groundwater and surface resources. In addition, this solution may not be sustainable for all projects in the long-term. Implementation of this mitigation measure would also conflict with the Project objective to minimize costs of infrastructure and services because this mitigation measure would require extensive infrastructure costs to implement.

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(3) Measure: In groundwater dependent areas with inadequate groundwater supply, project proponents shall be required to secure water contracts with other water providers to truck in water from local water districts or other sources such as an off-site well, prior to the issuance of discretionary permits.

Rationale for Rejection: This mitigation measure is considered to be infeasible because trucked water is not a guaranteed, sustainable, long-term source of water since a water district can rescind or preclude the selling of trucked water in times of drought and limited water supplies. Additionally, implementation of this mitigation measure would conflict with the Project objective to maintain environmentally sustainable communities and reduce greenhouse gas emissions that contribute to climate change because it would require extensive vehicle travel and is not a sustainable solution. Therefore, this would not be a feasible mitigation measure.

(4) Measure: In groundwater dependent areas with inadequate groundwater supply, project proponents shall be required to secure water contracts with the SDCWA in order to import water from SDCWA facilities.

Rationale for Rejection: This mitigation measure is considered to be infeasible due to the lack of infrastructure in place to convey the water, the limited availability of water within the desert southwest, the cost of providing these services, and the discretionary approval to extend the SDCWA boundary, which is outside of the County's jurisdiction. Implementation of this mitigation measure would also conflict with the Project objective to minimize costs of infrastructure and services because the implementation of this mitigation measure would result in extensive infrastructure costs.

(5) Measure: Implement a Countywide moratorium on building permits and development applications in any areas of the County that would have the potential to adversely impact groundwater supplies and recharge.

Rationale for Rejection: This would effectively result in no new impacts to groundwater supplies and recharge within the unincorporated County; however, due to the size and complexity of the groundwater dependent portion of the County, it is not possible to specifically identify at a parcel by parcel scale where significant impacts to groundwater resources would occur. Site-specific groundwater investigations are necessary to provide details of impacts that cannot be provided at the scale in which the 2011 General Plan Groundwater Study was conducted. Therefore, there is not enough technical evidence in which to impose a moratorium. This mitigation measure would also conflict with the Project objective to support a reasonable share of projected regional population growth. Therefore, for the reasons listed above, this mitigation measure would not be implemented.

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None of the Project alternatives would reduce impacts associated with groundwater supplies and recharge to below significant. While the Environmentally Superior alternative would further reduce groundwater impacts, this alternative still allows development that would result in impacts that are not mitigated to a level below significant without adopting the measures noted above. In addition, this alternative would not meet the Project objective of recognizing community and stakeholder interests while striving for consensus.

Conclusion: Because the measures listed above have been found to be infeasible; because application of all feasible mitigation and Project design measures would not achieve a level of less than significant; and because there are no feasible Project alternatives that would achieve a level of less than significant; impacts to groundwater supplies and recharge would remain significant and unavoidable.

Cumulative Impact – Groundwater Supplies and Recharge: As described above, implementation of the proposed Project would have the potential to substantially deplete groundwater supplies or interfere substantially with groundwater recharge. In combination with other cumulative projects, the Project would have the potential to result in a significant cumulative impact.

Facts in Support of Finding: Groundwater basins typically serve localized areas and, therefore, any cumulative impacts would generally be localized. The area of cumulative analysis for groundwater supplies and recharge includes the groundwater dependent areas of the unincorporated County and the immediately adjacent jurisdictional areas that share groundwater basins with County areas. As discussed in the Groundwater Study, significant cumulative impacts associated with adjacent jurisdictional projects are not anticipated. However, the impacts to basins evaluated for the Project are cumulative in nature because they represent the combined influence of numerous past, present, and future users of the groundwater aquifers.

General Plan Update policies and mitigation measures have been incorporated into the Project that would reduce cumulative impacts to groundwater supplies, but not to below a level of significance. Additional mitigation measures as described above for Project-level impacts were considered but found to be infeasible. Therefore, Project impacts to groundwater supplies and recharge would remain cumulatively considerable.

MINERAL RESOURCES

C-13 Significant Effect – Mineral Resource Availability: The FEIR identifies significant impacts related to the loss of availability of a known mineral resource that would be of value to the region and the residents of the State.

Mitigation Measures: The mitigation measures identified in the FEIR partially mitigate the significant impact as follows:

- Min-1.1 requires the County to assess the impact of new development on mineral resources as stated in the County Guidelines for Determining Significance for Mineral Resources. It is also required that these guidelines be updated to require evaluation of whether access is being maintained to existing mining sites. This measure will ensure that known mineral resource areas are considered during future planning and development.

- Min-1.2 is the revision of County ordinances to designate areas of known importance for mineral resources as follows:
    - Update the Zoning Ordinance with the addition of a Mining Compatibility Designator or Overlay that identifies parcels with a high potential for mineral resources. The purpose is to take into account the potential mineral resources and that the potential mining use would not be precluded. In addition, specify that notification of potential mining use is provided to all parcels within a 1,500 foot radius of parcels with a Mining Compatibility Designator/Overlay.
    - Revise the Zoning Ordinance to facilitate recycling of salvaged concrete, asphalt, and rock at permitted mining facilities.
    - Revise the Zoning Ordinance and Grading Ordinance to authorize surface mining operations with a Surface Mining Permit rather than a Major Use Permit. Incorporate findings of approval that reflect Mineral Compatibility Designator, SMARA Sections 2762 and 2763, and the inherent nature of surface mining operations. Parcels with a high potential for mineral resources could include those areas designated as MRZ-2 or other areas identified as containing mineral resources that are located where a sufficient buffer is available so that extraction activities are feasible.

  Implementation of these changes will allow better protection of known valuable mineral resource areas from incompatible uses.

- Min-1.3 is the request that the State Geologist identify mineral resources in previously unmapped areas of East and North County. The mapping of additional valuable mineral resources zones will provide the County with more opportunity to make areas available for mineral extraction.

The Project also includes policies in the Conservation and Open Space Element that address mineral resources. The relevant policies are: COS-10.1 through COS-10.4, COS-10.6, COS-10.8, and COS-10.9. These policies facilitate protection of mineral resource areas from incompatible land uses, require that road access to mining facilities be maintained, and provide for special (less-time consuming) permitting of mining operations. Adherence to these policies will further reduce impacts associated with mineral resource availability.

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Facts in Support of Finding: The Project proposes land uses in areas designated MRZ-2, MRZ-3, or those areas underlain by Quaternary alluvium that would be incompatible with these resources and would result in the loss of availability of known or suspected mineral resources that would be of value to the region and the residents of the State. General Plan Update policies and mitigation measures would reduce impacts to mineral resource availability, but not to below a level of significance.

The following measures were also considered to reduce impacts to mineral resource availability to below significant. However, the County has determined that these measures would be infeasible, as described below. Therefore, the following mitigation measures will not be implemented.

(1) Measure: Prohibit incompatible uses that would be located on or near significant mineral resource sites.

Rationale for Rejection: This measure would result in restrictions on future development in areas identified for increased growth in the Project because significant or potentially significant mineral resources sites have been identified throughout the western portion of the unincorporated County, where the majority of development under the Project would take place. Thus, this measure would conflict with goal of the Housing Element to provide sufficient housing stock and would not achieve one of the primary objectives of the Project which is to accommodate a reasonable amount of growth.

(2) Measure: For projects that propose incompatible uses near significant mineral resource sites, require the applicants to mine the site prior to project development.

Rationale for Rejection: This measure would result in significant cost increases and processing timeframes for developers since extraction activities often take decades to complete and may make the site unusable for the proposed land use. In some cases, incompatible land uses may already exist in the vicinity of the mineral resource site that would make extraction at the site infeasible. Moreover, the mandated mineral extraction can cause numerous other site-specific environmental impacts associated with mining that cannot be known at this time. This measure is therefore infeasible for economic reasons as well as because of potential physical and land use constraints.

(3) Measure: Use public funds to initiate new mineral extraction operations.

Rationale for Rejection: This measure would require voter or Board of Supervisors approval to appropriate funds toward mineral extraction operations, which cannot be guaranteed. Moreover, this would initiate extraction sites in many areas of the County, which would potentially result in numerous environmental impacts and conflict with the Project objective to minimize public costs and infrastructure.

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None of the Project alternatives would reduce impacts associated with mineral resource availability to below significant. While the Environmentally Superior alternative would further reduce mineral resource impacts, this alternative still allows development that would result in impacts that are not mitigated to a level below significant without adopting the measures noted above. In addition, this alternative would not meet the Project objective of recognizing community and stakeholder interests while striving for consensus.

Conclusion: Because the measures listed above have been found to be infeasible; because application of all feasible mitigation and Project design measures would not achieve a level of less than significant; and because there are no feasible Project alternatives that would achieve a level of less than significant; impacts associated with mineral resource availability would remain significant and unavoidable.

Cumulative Impact – Mineral Resource Availability: As described above, implementation of the proposed Project would have the potential to result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State. In combination with other cumulative projects, the Project would have the potential to result in a significant cumulative impact.

Facts in Support of Finding: Construction and operation of cumulative projects in the region would have the potential to result in the loss of availability of known mineral resources. Urbanization and growth in the jurisdictions adjacent to the unincorporated County would have the potential to result in land uses that are incompatible with mining and resource recovery and would result in a cumulative loss of available resources. Project policies and mitigation measures would reduce cumulative impacts to the availability of known mineral resource areas, but not to below a level of significance. Additional mitigation measures as described above for Project-level impacts were considered but found to be infeasible. Therefore, Project impacts to mineral resource availability would remain cumulatively considerable.

C-14 **Significant Effect – Mineral Resource Recovery Sites:** The FEIR identifies significant impacts related to the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan.

Mitigation Measures: The mitigation measures identified in the FEIR partially mitigate the significant impact as follows:

- Min-1.1 requires the County to assess the impact of new development on mineral resources as stated in the County Guidelines for Determining Significance for Mineral Resources. It is also required that these guidelines be updated to require evaluation of whether access is being maintained to existing mining sites. This

measure will ensure that known mineral resource recovery sites are considered during future planning and development.

- Min-1.2 is the revision of County ordinances to designate areas of known importance for mineral resources as follows:
    - Update the Zoning Ordinance with the addition of a Mining Compatibility Designator or Overlay that identifies parcels with a high potential for mineral resources. The purpose is to take into account the potential mineral resources and that the potential mining use would not be precluded. In addition, specify that notification of potential mining use is provided to all parcels within a 1,500 foot radius of parcels with a Mining Compatibility Designator/Overlay.
    - Revise the Zoning Ordinance to facilitate recycling of salvaged concrete, asphalt, and rock at permitted mining facilities.
    - Revise the Zoning Ordinance and Grading Ordinance to authorize surface mining operations with a Surface Mining Permit rather than a Major Use Permit. Incorporate findings of approval that reflect Mineral Compatibility Designator, SMARA Sections 2762 and 2763, and the inherent nature of surface mining operations. Parcels with a high potential for mineral resources could include those areas designated as MRZ-2 or other areas identified as containing mineral resources that are located where a sufficient buffer is available so that extraction activities are feasible.

  Implementation of these changes will allow better protection of known mineral resource recovery sites from incompatible uses.

- Min-1.3 is the request that the State Geologist identify mineral resources in previously unmapped areas of East and North County. The mapping of additional valuable mineral resources zones will provide the County with more opportunity to make areas available for mineral extraction.

The Project also includes policies in the Conservation and Open Space Element that address mineral resources. The relevant policies are: COS-10.1 through COS-10.4, COS-10.6, COS-10.8, and COS-10.9. These policies facilitate protection of mineral resource areas from incompatible land uses, require that road access to mining facilities be maintained, and provide for special (less-time consuming) permitting of mining operations. Adherence to these policies will further reduce impacts associated with mineral resource recovery sites from future development.

Facts in Support of Finding: The Project proposes potentially incompatible land uses that would have the potential to encroach on areas where mines are active or where future resource recovery sites would have otherwise been permitted. General Plan Update policies and mitigation measures would reduce impacts to mineral resource recovery sites, but not to below a level of significance.

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The following measures were also considered to reduce impacts to mineral resource recovery sites to below significant. However, the County has determined that these measures would be infeasible, as described below. Therefore, the following mitigation measures will not be implemented.

(1) Measure: Prohibit incompatible uses that would be located on or near significant mineral resource sites.

Rationale for Rejection: This measure would result in restrictions on future development in areas identified for increased growth in the Project because significant or potentially significant mineral resources sites have been identified throughout the western portion of the unincorporated County, where the majority of development under the Project would take place. Thus, this measure would conflict with goal of the Housing Element to provide sufficient housing stock and would not achieve one of the primary objectives of the Project which is to accommodate a reasonable amount of growth.

(2) Measure: For projects that propose incompatible uses near significant mineral resource sites, require the applicants to mine the site prior to project development.

This measure would result in significant cost increases and processing timeframes for developers since extraction activities often take decades to complete and may make the site unusable for the proposed land use. In some cases, incompatible land uses may already exist in the vicinity of the mineral resource site that would make extraction at the site infeasible. Moreover, the mandated mineral extraction can cause numerous other site-specific environmental impacts associated with mining that cannot be known at this time. This measure is therefore infeasible for economic reasons as well as because of potential physical and land use constraints.

(3) Measure: Use public funds to initiate new mineral extraction operations.

Rationale for Rejection: This measure would require voter or Board of Supervisors approval to appropriate funds toward mineral extraction operations, which cannot be guaranteed. Moreover, this would initiate extraction sites in many areas of the County, which would potentially result in numerous environmental impacts and conflict with the Project objective to minimize public costs and infrastructure.

None of the Project alternatives would reduce impacts associated with mineral resource recovery sites to below significant. While the Environmentally Superior alternative would further reduce mineral resource impacts, this alternative still allows development that would result in impacts that are not mitigated to a level below significant without adopting the measures noted above. In addition, this alternative would not meet the Project

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objective of recognizing community and stakeholder interests while striving for consensus.

Conclusion: Because the measures listed above have been found to be infeasible; because application of all feasible mitigation and Project design measures would not achieve a level of less than significant; and because there are no feasible Project alternatives that would achieve a level of less than significant; impacts to mineral resource recovery sites would remain significant and unavoidable.

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Cumulative Impact – Mineral Resource Recovery Sites: As described above, implementation of the proposed Project would have the potential to result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. In combination with other cumulative projects, the Project would have the potential to result in a significant cumulative impact.

Facts in Support of Finding: Urbanization and growth in the jurisdictions adjacent to the unincorporated County would have the potential to result in land uses that are incompatible with mineral resource recovery. Projected growth in the region would result in a reasonably foreseeable loss of mineral resource recovery sites due to the encroachment of incompatible uses that would preclude the extraction of mineral resources. General Plan Update policies and mitigation measures would reduce cumulative impacts to mineral resource recovery sites, but not to below a level of significance. Additional mitigation measures as described above for project-level impacts were considered but found to be infeasible. Therefore, Project impacts to mineral resource recovery sites would remain cumulatively considerable.

NOISE

C-15 Significant Effect – Permanent Increase in Ambient Noise Levels: The FEIR identifies significant impacts associated with the substantial permanent increase in ambient noise which would exceed the sound level limits specified in San Diego County Code Section 36.404, Sound Level Limits, at the property line of the property on which the noise is produced or at any location on a property that is receiving the noise.

Mitigation Measures: The mitigation measures identified in the FEIR partially mitigate the significant impact as follows:

- Noi-1.3 requires that an acoustical study be done for projects proposing amendments to the County General Plan Land Use Element and/or Mobility Element when a significant increase to the average daily traffic is proposed compared to traffic anticipated in the General Plan. This measure will prevent unanticipated noise level increases for sensitive land uses.

- Noi-1.4 is the revision of the Guidelines for Determining Significance - Noise standard mitigation and project design considerations to promote traffic calming design, traffic control measures, and low-noise pavement surfaces that minimize motor vehicle traffic noise. These types of project features will help minimize potential noise impacts on sensitive land uses.

- Noi-1.5 requires coordination with Caltrans and SANDAG as appropriate to identify and analyze appropriate route alternatives that may minimize noise impacts to noise sensitive land uses within the unincorporated areas of San Diego County.

- Noi-1.8 is the implementation of procedures (or cooperative agreements) with Caltrans, the City of San Diego, and other jurisdictions as appropriate to ensure that a public participation process or forum is available for the affected community to participate and discuss issues regarding transportation generated noise impacts for new or expanded roadway projects that may affect noise sensitive land uses within the unincorporated areas of San Diego County.

- Noi-2.3 requires that industrial facility projects be reviewed to ensure they are located in areas that would minimize impacts to noise-sensitive land uses. It further requires revisions to the County of San Diego Guidelines for Determining Significance - Noise to incorporate appropriate noise attenuation measures for minimizing industrial-related noise. This will reduce direct and cumulative increases in ambient noise levels.

- Noi-2.4 requires that an acoustical study accompany extractive mining projects that may affect noise-sensitive land uses. Similarly, it requires an acoustical study for noise-sensitive land use projects proposed near existing extractive land use facilities. The results of the acoustical study may require a “buffer zone” or other mitigating features to reduce impacts the impacts of increased noise levels on sensitive receptors.

- Noi-3.1 requires that for new County road improvement projects, either the County’s Noise Standards are used to evaluate noise impacts or the Project does not exceed 3 decibels over existing noise levels. This measure will help to minimize and direct and cumulative noise level increases associated with County road improvements.

- Noi-3.2 requires the County to work with the project applicant during the review of either the building permit or discretionary action (whichever is applicable) to determine appropriate noise reduction site design techniques that include:
    - Orientation of loading/unloading docks away from noise sensitive land uses
    - Setbacks or buffers to separate noise generating activities from noise sensitive land uses

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- Design on-site ingress and egress access away from noise sensitive land uses

These measures will help minimize permanent increases in ambient noise from future development under the Project.

The Project also includes policies in the Land Use, Mobility, and Noise Elements that address noise impacts. The relevant policies are: LU-2.8, M-1.3, M-2.4, N-1.5, N-4.1, N-4.2, N-4.6, N-5.1, and N-5.2. These policies reduce the potential for increases in average daily traffic to increase cumulative traffic noise to noise-sensitive land uses; apply traffic calming design, traffic control measures, and low-noise pavement surfaces that minimize motor vehicle traffic noise; require proposed projects to be evaluated against ambient noise levels to determine whether the project would increase ambient noise levels by more than three decibels; require development to be designed so that automobile and truck access to industrial and commercial properties abutting residential properties is located at the maximum practical distance from residential zones, encourage noise-generating industrial facilities to be located at the maximum practical distance from residential zones; require measures that minimize significant impacts to surrounding areas from uses or operations that cause excessive noise; and require plans for high-volume roadways to consider noise-sensitive receptors in location and design. Adherence to these policies will further reduce impacts associated with permanent increases in ambient noise levels.

Facts in Support of Finding: Traffic on new roadways or roadway improvements, as well as operation of new industrial facilities and other noise-generating uses under the Project would result in potentially significant permanent increases in ambient noise level. General Plan Update policies and mitigation measures would reduce impacts associated with the permanent increase of ambient noise levels, but not to below a level of significance.

The following measure was also considered to reduce impacts associated with the permanent increase of ambient noise levels to below significant. However, the County has determined that this measure would be infeasible, as described below. Therefore, the following mitigation measure will not be implemented.

(1) Measure: Prohibit new roadways or roadway improvements that would result in a significant increase in the ambient noise level.

Rationale for Rejection: The measure would prohibit the construction of many roadway projects proposed in the Mobility Element because they would result in increases in ambient noise. This measure is infeasible because it would restrict future development in areas identified for increased growth under the Project because new roadways to serve this growth would not be constructed. Additionally, this mitigation measure would conflict with the Project objective to provide and

support a multi-modal transportation network that enhances connectivity and supports community development patterns because it would prohibit the development of new roadways.

None of the Project alternatives would reduce impacts associated with the permanent increase in ambient noise levels to below significant. While the Environmentally Superior alternative would further reduce noise impacts, this alternative still allows development that would result in impacts that are not mitigated to a level below significant without adopting the measure noted above. In addition, this alternative would not meet the Project objective of recognizing community and stakeholder interests while striving for consensus.

Conclusion: Because the measure listed above has been found to be infeasible; because application of all feasible mitigation and Project design measures would not achieve a level of less than significant; and because there are no feasible Project alternatives that would achieve a level of less than significant; impacts associated with the permanent increase in ambient noise levels would remain significant and unavoidable.

Cumulative Impact – Permanent Increase in Ambient Noise Levels: As described above, implementation of the proposed Project would have the potential to result in a substantial permanent increase in ambient noise which would exceed the sound level limits specified in San Diego County Code Section 36.404 at the property line of the property on which the noise is produced or at any location on a property that is receiving the noise. In combination with other cumulative projects, the Project would have the potential to result in a significant cumulative impact.

Facts in Support of Finding: A cumulative noise impact would occur if construction and development associated with cumulative regional land use projects, such as those identified in adjacent jurisdictions and regional transportation plans, when combined would result in an increase in ambient noise that would exceed the County's noise standards. For example, future casino development on tribal lands could result in an increase in ambient noise due to increases in traffic on local roads associated with vehicles and passenger buses that transport customers to and from casinos. General Plan Update policies and mitigation measures incorporated into the Project would reduce cumulative impacts associated with the permanent increase of ambient noise levels, but not to below a level of significance. An additional mitigation measure as described above for project-level impacts was considered but found to be infeasible. Therefore, Project impacts associated with the permanent increase of ambient noise levels would remain cumulatively considerable.

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TRANSPORTATION AND TRAFFIC

C-16 Significant Direct and Cumulative Effect – Unincorporated County Traffic and Level of Service Standards: The FEIR identifies significant impacts related to (a) an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system; and (b) exceedance, individually or cumulatively, of a level of service standard established by the County Congestion Management Agency for designated roads or highways.

Mitigation Measures: The mitigation measures identified in the FEIR partially mitigate the significant impact as follows:

- Tra-1.1 requires the County to coordinate with SANDAG and adjacent cities during updates to the Regional Transportation Plan (RTP) to identify a transportation network that maximizes efficiency, enhances connectivity between different modes of travel, and minimizes impacts when locating new freeways and State highways. This coordination can help prevent future exceedance of LOS standards on Mobility Element roads in the County and mitigate potential traffic increases.

- Tra-1.2 requires the County to coordinate with Caltrans and adjacent jurisdictions during planning and design for improvements to the freeway and State highway network. This coordination can help prevent future exceedance of LOS standards on Mobility Element roads in the County and mitigate potential traffic increases.

- Tra-1.3 is the implementation of County Public Road Standards during review of new development projects. Tra-1.3 also includes revision of the Public Road Standards to include a range of road types according to Regional Category context. Application of this measure will ensure that LOS standards are met when feasible and that appropriate road types are assigned based the specifics of the development.

- Tra-1.4 is the implementation, and revision as necessary, of the County Guidelines for Determining Significance for Transportation and Traffic to evaluate adverse environmental effects of projects and require mitigation when significant impacts are identified. This measure will ensure that appropriate site design and mitigating measures are applied to minimize traffic increases and road deficiencies associated with future development under the Project.

- Tra-1.5 is the implementation of the Congestion Management Strategies identified in the Regional Transportation Plan. Tra-1.5 also requires that large projects processed through the County mitigate impacts to State highways and freeways. This effort will reduce potential cumulative traffic increases in the County.

- Tra-1.6 requires the County to develop project review procedures to require large commercial and office development to use Transportation Demand Management

Programs to reduce single-occupant vehicle traffic generation and to prepare and forward annual reports to the County on the effectiveness of the program. This measure will reduce potential traffic increases in the County associated with commercial and office development under the Project.

- Tra-1.7 is the implementation of the San Diego County Transportation Impact Fee (TIF) Ordinance, which defrays the costs of constructing planned transportation facilities necessary to accommodate increased traffic generated by future development. This measure will help reduce financial barriers associated with accommodating increased traffic and/or meeting LOS standards.

The Project also includes policies in the Land Use and Mobility Elements that address traffic and LOS standards. The relevant policies are: LU-5.1, LU-10.4, LU-11.8, LU-12.2, M-1.1, M-1.2, M-1.3, M-2.1, M-2.2, M-2.3, M-3.1, M-3.2, M-4.2, M-5.1, M-5.2, M-9.1, and M-9.2. These policies promote the reduction of vehicle trips, limit high-traffic uses in rural and semi-rural areas, encourage uses that would reduce the frequency of employee vehicle trips, require development to mitigate the significant impacts to existing service levels of public facilities, provide for an interconnected road network, encourage alternative transportation, establish LOS criteria, and apply appropriate road standards to future development. Adherence to these policies will further reduce impacts associated with County traffic and LOS standards from future development.

Facts in Support of Finding: The traffic analysis identified the overall traffic impacts relative to the change in land use designations for the proposed Project as a whole. This analysis did not evaluate the detailed impacts of individual Project parcels that may develop within the affected communities in the future. The individual impacts from future development of these parcels would be addressed on a case-by-case basis and reviewed by County of San Diego when applications are filed.

Nine community and subregional planning areas are affected by the Project land use changes: Alpine, Central Mountain, Desert, Jamul, Julian, Mountain Empire, North Mountain, Pendleton/De Luz, and Ramona. Of these nine communities, approximately 95% of this increase in ADT is the result of proposed land use changes in Alpine. Therefore, the traffic impact analysis (Appendix D) determined that Alpine would be the only community with a potential for significant traffic-related impacts. To determine the impacts, the parcels forecast to have substantial increases in trips were grouped together into Focus Areas. The trips forecast for each Focus Area were loaded onto the roadway network and operating conditions were evaluated for Project conditions.

Although nine roadway segments forecast to operate at LOS E and F with buildout of the Proposed Project Map, only one road segment would be reclassified. The proposed Project would reclassify Willows Road from Viejas Casino Road east to Interstate 8 on-ramp from a two-lane 2.2E Light Collector to a four-lane 4.2B Boulevard with Intermittent Turn Lanes. However, even with the classification change, this road segment would still

operate at LOS F because a 6.2 Prime Arterial classification would be required to fully mitigate forecasted traffic as a result of the land use map changes.
The proposed Project would result in significant traffic impacts on nine Alpine roadway segments. These impacts would also be cumulative in nature as cumulative projects such as regional transportation projects, development consistent with general plans, and tribal developments would be expected to increase traffic within the region and potentially on these deficient roadway segments.

Additional measures were also considered to reduce impacts to County traffic and LOS standards to below significant. The majority of measures that were considered in attempting to further reduce the amount of deficient roadway segments included identifying new or expanded road segments to mitigate other projected failing segments. However, based on criteria developed in the General Plan Update, these measures were rejected as infeasible.

In addition to implementation of the same applicable 2011 General Plan policies and mitigation measures identified in the General Plan Update PEIR, and repeated below, the listed reclassifications of the following Mobility Element roads (to meet the LOS D standards of County Policy M-2.1) would reduce Project traffic impacts to below a level of significance for the roadway segments shown below:

- Alpine Boulevard from Tavern Road to West Victoria Drive: Reclassify roadway segment from a Light Collector with Raised Median (2.2A) to a Boulevard with Intermittent Turn Lanes (4.2B).
- Alpine Boulevard from West Victoria Drive to Louise Drive: Reclassify roadway segment from a Light Collector with Raised Median (2.2A) to a Major Road with Intermittent Turn Lanes (4.1B).
- Alpine Boulevard from Louise Drive to South Grade Road: Reclassify roadway segment from a Light Collector with Raised Median (2.2A) to a Boulevard with Intermittent Turn Lanes (4.2B).
- Alpine Boulevard from South Grade Road to Viejas View Place: Reclassify roadway segment from a Community Collector with Improvement Options (2.1D) to a Boulevard with Intermittent Turn Lanes (4.2B).
- Alpine Boulevard from Viejas View Place to West Willows Road: Reclassify roadway segment from a Community Collector with Improvement Options (2.1D) to a Boulevard with Intermittent Turn Lanes (4.2B).
- Alpine Boulevard from West Willows Road to Willows Road (eastern end): Reclassify roadway segment from a Community Collector with Intermittent Turn Lanes (2.1C) to a Boulevard with Intermittent Turn Lanes (4.2B).

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- South Grade Road from Eltinge Drive to Olive View Road: Reclassify roadway segment from a Light Collector with Intermittent Turn Lanes (2.2C) to a Boulevard with Intermittent Turn Lanes (4.2B).
- West Willows Road from Alpine Boulevard to Otto Avenue: Reclassify roadway segment from a Light Collector (2.2E) to a Boulevard with Raised Median (4.2A).
- Willows Road from Otto Avenue to Viejas Casino Road: Reclassify roadway segment from a Light Collector (2.2E) to a Prime Arterial (6.2).
- Willows Road from Viejas Casino Road to I-8 On-Ramp: Reclassify roadway segment from a Light Collector (2.2E) to a Prime Arterial (6.2).

In accordance with Goal M-2 under Policy M-2.1 and shown in Table 2.13-7, the County has determined that it is more appropriate to maintain deficient LOS E or F operations on the following 11 roadway segments:

Alpine Boulevard from:

- Tavern Road to Boulders Road
- Boulders Road to Alpine Special Treatment Center
- Alpine Special Treatment Center to West Victoria Drive
- West Victoria Drive to Louise Drive
- Louise Drive to Viejas View Place
- Viejas View Place to West Willows Road
- West Willows Road to Willows Road

South Grade Road from:

- Eltinge Drive to Olive View Road

West Willows Road from Alpine Boulevard to Otto Avenue / Willows Road

Willows Road from:

- Otto Avenue to Viejas Casino Road
- Viejas Casino Road to I-8 On-Ramp

With respect to these 11 roadway segments, the County has established the following LOS E/F criteria to define the conditions where a deficient LOS is acceptable, because mitigation to fully reduce the impact would be infeasible for one or more of the reasons described below:

Environmental Impacts: Construction of some roads would significantly impact important habitats, destroy archaeological sites, impact waterways, or require the demolition of historic landmarks.

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Established Land Development: Existing businesses, historic buildings, established neighborhoods, and a pedestrian-friendly environment are essential components of a healthy town center. Road improvements that negatively affect these components can be undesirable. Wider roads may divide a town and change its character.

Town Centers: Roadways may be exempted from County LOS standards when widening the road would obstruct pedestrian movements, impede the economic vitality of existing/planned businesses, require the demolition of historic structures, or negatively alter the overall character of the area.

Marginal Deficiencies: Exempting a road from County LOS standards may be the more preferable choice when a road failure results from only a marginal deficiency in performance. If the projected volume is not anticipated to affect overall traffic operation, planning for a wider road to accommodate the additional traffic may not be required. Acceptance of a lower LOS is particularly appropriate when underutilized, alternate routes are available.

Environmental Constraints: Major physical and environmental constraints can severely hinder construction of needed improvements for some failing roads. The 2011 General Plan policies seek to minimize environmental impacts and minimize road construction costs.

The mitigation measures listed above have been found to be infeasible; therefore, impacts would remain significant and unavoidable.

None of the Project alternatives would reduce impacts associated with County traffic and level of service standards to below significant. While the Environmentally Superior alternative would further reduce traffic impacts, this alternative still allows development that would result in impacts that are not mitigated to a level below significant without new or expanded road and/or intersection construction as described above. In addition, this alternative would not meet the Project objective of recognizing community and stakeholder interests while striving for consensus.

Conclusion: Because new or expanded road and/or intersection construction on the deficient roadway segments would be infeasible; because application of all feasible mitigation and Project design measures would not achieve a level of less than significant; and because there are no feasible Project alternatives that would achieve a level of less than significant; impacts associated with County traffic and level of service standards would remain significant and unavoidable.

Cumulative Impact – Unincorporated County Traffic and Level of Service Standards: As described above, implementation of the proposed FCI Lands GPA would have the potential to result in an increase in traffic and exceedance of Level of Service (LOS) standard. In combination with other cumulative projects, the project would have the potential to result in a significant cumulative impact within the Alpine CPA.

Facts in Support of Finding: Cumulative projects would result in additional LOS E roadway segments and this would be considered a significant cumulative impact. The FCI Lands GPA is projected to result in significant impacts to nine road segments in the Alpine CPA. Therefore, the project would result in a cumulatively considerable contribution to a significant cumulative traffic impact.

C-17 Significant Effect – Rural Road Safety: The FEIR identifies significant impacts related to substantial increases in hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).

Mitigation Measures: The mitigation measures identified in the FEIR partially mitigate the significant impact as follows:

- Tra-1.3 is the implementation of County Public Road Standards during review of new development projects. Tra-1.3 also includes revision of the Public Road Standards to include a range of road types according to Regional Category context. Application of this measure will ensure that future public roads meet current safety standards.

- Tra-1.4 is the implementation, and revision as necessary, of the County Guidelines for Determining Significance for Transportation and Traffic to evaluate adverse environmental effects of projects and require mitigation when significant impacts are identified. This measure will ensure that appropriate site design and mitigating measures are applied to prevent road hazards associated with future development.

- Tra-1.7 requires the County to develop project review procedures to require large commercial and office development to use Transportation Demand Management Programs to reduce single-occupant vehicle traffic generation and to prepare and forward annual reports to the County on the effectiveness of the program. This measure will reduce potential rural road hazards from features or incompatible uses associated with commercial and office development under the General Plan Update.

- Tra-3.1 requires coordination with SANDAG to obtain funding for operational improvements to State highways and freeways in the unincorporated area. This will reduce potential incompatibility of alternative transportation facilities with roadway and highway facilities, thereby improving safety for pedestrians and bicyclists.

The Project also includes policies in the Land Use and Mobility Elements that address rural road safety. The relevant policies are: LU-2.8, LU-6.10, M-4.3, M-4.4, M-4.5, and M-9.1. These policies help minimize adverse effects that are detrimental to human health and safety, help to protect people and property from natural and man-induced hazards, require that roads have safe and adequate emergency access, and encourage operational improvements that increase the effective vehicular capacity of the public

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road network. Adherence to these policies will further reduce impacts associated with rural road safety from future development.

Facts in Support of Finding: Implementation of the proposed General Plan would result in the adoption of a Mobility Element network that includes existing roadways with horizontal and vertical curves that are sharper than existing standards. This would be considered a potential transportation hazard. Additionally, the proposed General Plan Update may pose an increased risk to pedestrians and bicyclists by increasing and/or redistributing traffic patterns. Implementation of the proposed General Plan Update would also have the potential to result in hazards from at-grade rail crossings. General Plan Update policies and mitigation measures would reduce impacts to rural road safety, but not to below a level of significance.

The following measures were also considered to reduce impacts to rural road safety to below significant. However, the County has determined that these measures would be infeasible, as described below. Therefore, the following mitigation measures will not be implemented.

(1) Measure: Require all roadway facilities with horizontal and vertical curves that are sharper than existing standards to undergo construction improvements so that facilities would be compliant with existing safety standards.

Rationale for Rejection: This measure would be considered infeasible due to related construction improvement costs and the fact that while some roadways may not be compliant with existing safety standards, they may be operating at acceptable LOS standards. In addition, some of the transportation facilities in the unincorporated County are within the jurisdiction of another agency, such as Caltrans. Additionally, implementation of this measure would require construction improvements to many roadways in the unincorporated backcountry area, where the majority of development would not be located under implementation of the proposed General Plan Update. Therefore, this mitigation measure would conflict with the Project's objective to provide and support a multi-modal transportation network that enhances connectivity and supports community development patterns.

(2) Measure: All transportation facilities within the unincorporated County shall be retrofitted to provide safe bicycle and pedestrian movement corridors.

Rationale for Rejection: This measure would conflict with the Project's objective to minimize public costs of infrastructure and services and correlate their timing with development. Additionally, this measure would be considered infeasible due to related construction improvement costs and the fact that improvements required by this mitigation measure may reduce the existing and future service level standards of the facilities. In addition, some of the transportation facilities in the unincorporated County are within the jurisdiction of another agency, such as Caltrans.

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None of the Project alternatives would reduce impacts associated with rural road safety to below significant. While the Environmentally Superior alternative would further reduce rural road safety impacts, this alternative still allows development that would result in impacts that are not mitigated to a level below significant without adopting the measures noted above. In addition, this alternative would not meet the Project objective of recognizing community and stakeholder interests while striving for consensus.

Conclusion: Because the measures listed above have been found to be infeasible; because application of all feasible mitigation and Project design measures would not achieve a level of less than significant; and because there are no feasible Project alternatives that would achieve a level of less than significant; impacts associated with rural road safety would remain significant and unavoidable.

Cumulative Impact – Rural Road Safety: As described above, implementation of the proposed Project would have the potential to result in substantial increases in hazards due to a design feature or incompatible uses. In combination with other cumulative projects, the Project would have the potential to result in a significant cumulative impact.

Facts in Support of Finding: The area of analysis for cumulative transportation operation includes the County of San Diego and immediately surrounding jurisdictions. Cumulative projects in these areas include projects consistent with surrounding jurisdictions' general plans and regional roadway plans such as the SANDAG RTP and SCAG RTP. Cumulative projects in surrounding jurisdictions would face similar potential transportation operational issues as those in the unincorporated County. Older roadways in incorporated jurisdictions that surround the County would not be adequate by existing roadway standards. Additionally, many unincorporated areas that surround the County, including areas within the Counties of Riverside and Imperial have rural roadway conditions similar to the unincorporated County. Therefore, cumulative projects in these areas would face the same traffic operational concerns including: roadway networks that include existing roadways with horizontal and vertical curves sharper than existing standards; increased traffic on rural roads with slow moving agricultural vehicles; increased risk to pedestrians and bicyclists by increasing and/or redistributing traffic patterns; or hazards from at-grade rail crossings. While cumulative projects would not preclude improvements to roadways with potential hazards, there is no guarantee that these improvements would be constructed concurrently with the anticipated increase in vehicle trips on these roadways. General Plan Update policies and mitigation measures incorporated into the Project would reduce cumulative impacts to rural road safety, but not to below a level of significance. Additional mitigation measures as described above for Project-level impacts were considered but found to be infeasible. Therefore, Project impacts to rural road safety would remain cumulatively considerable.

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C-18 Significant Effect – Adequate Water Supplies: The FEIR identifies significant impacts related to (1) a demand for water that exceeds existing entitlements and resources, or necessitates new or expanded entitlements; and (2) substantial depletion of groundwater supplies or interference with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level.

Mitigation Measures: The mitigation measures identified in the FEIR partially mitigate the significant impact as follows:

- USS-4.1 requires the County to review General Plan Amendments (GPAs) for consistency with the goals and policies of the General Plan. This shall include designating groundwater dependent areas with land use density/intensity that is consistent with the long-term sustainability of groundwater supplies; locating commercial, office, civic, and industrial development in villages, town centers or at transit nodes; and ensuring that adequate water supply is available for development projects that rely on imported water. This will prevent future GPAs for development that would result in a demand for water exceeding available imported water or groundwater supplies.

- USS-4.2 requires the County to implement, and revise as necessary, the County Green Building Program with incentives for development that is energy efficient and conserves resources, including both groundwater and imported water. Participation in this program can potentially reduce future demand on existing water supplies.

- USS-4.3 is the implementation of Policy I-84 requiring that discretionary projects obtain water district commitment that water services are available. This will prevent future discretionary projects in water district areas that require imported water supply in exceedance of existing availability. USS-4.3 also requires the County to implement and revise as necessary Board Policy G-15 to conserve water at County facilities. Water conservation efforts at County facilities will reduce future demand on water supply in the County and serve as an example to other land uses that rely on water supply.

- USS-4.4 is the implementation of the Groundwater Ordinance to balance groundwater resources with new development. USS-4.4 also requires the County to implement and revise as necessary the Watershed Ordinance to encourage the removal of invasive species to restore natural drainage systems, thereby improving water quality and surface water filtration. In addition, this measure requires implementation and revision of the Ordinance Relating to Water Efficient for Landscaping to further water conservation through the use of recycled water. These efforts will minimize drawdown of groundwater supply, allow for recharge of groundwater storage, and reduce future demand of imported water and groundwater.

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- USS-4.5 requires the County to use the County Guidelines for Determining Significance for Groundwater Resources, Surface Water Quality, and Hydrology to identify and minimize adverse environmental effects on groundwater resources.

- USS-4.6 requires the County to establish a water credits program between the County and the Borrego Water District to encourage an equitable allocation of water resources. This measure will potentially allow for replacement of water intensive uses in Borrego with land uses that require less groundwater.

- USS-4.7 is the coordination with the San Diego County Water Authority and other water agencies to correlate land use planning with water supply planning and support continued implementation and enhancement of water conservation programs. This effort will reduce the potential for exceedance of water availability under the General Plan Update.

The Project also includes policies in the Land Use and Conservation and Open Space Elements that address water supply. The relevant policies are: LU-8.1, LU-8.2, LU-13.1, LU-13.2, COS-4.1 through COS-4.4, COS-5.2, and COS-5.5. These policies require that densities and development in groundwater dependent areas be consistent with the long-term sustainability of groundwater supplies, apply water conservation measures, facilitate regional coordination with water districts, and preserve the quality of local water supply. Adherence to these policies will further reduce impacts associated with adequate water supplies from future development.

Facts in Support of Finding: Implementation of the proposed Project would increase the number of housing units and populations served within the service areas of San Diego County Water Authority member water districts and groundwater dependent water districts. Although multiple planning documents exist to ensure a reliable water supply is available for future growth within the County, the combined effect of the impacts related to obtaining additional water supplies, the uncertainties inherent in obtaining those supplies, and construction impacts related to extraction, processing and/or conveyance of additional water supply leads to the conclusion that implementation of the proposed Project would be potentially significant.

The following measure was also considered to reduce impacts to adequate water supplies to below significant. However, the County has determined that this measure would be infeasible, as described below. Therefore, the following mitigation measure will not be implemented.

(1) Measure: Implement a Countywide moratorium on building permits and development applications in any areas of the County that would have an inadequate imported water supply to serve future development until adequate supplies are procured.

Rationale for Rejection: This would effectively result in no increase in the amount of imported water demand within the unincorporated County. However, this measure would impede the County's ability to implement the Project because it would prohibit future development in areas identified for increased growth in the Project. This mitigation measure would also conflict with the Project objective to support a reasonable share of projected regional population growth. Therefore, for the reasons listed above, this mitigation measure would not be implemented.

None of the Project alternatives would reduce impacts associated with adequate water supplies to below significant. While the Environmentally Superior alternative would further reduce the impacts to water supplies, this alternative still allows development that would result in impacts that are not mitigated to a level below significant without adopting the measure noted above. In addition, this alternative would not meet the Project objective of recognizing community and stakeholder interests while striving for consensus.

Conclusion: Because the measure listed above has been found to be infeasible; because application of all feasible mitigation and Project design measures would not achieve a level of less than significant; and because there are no feasible Project alternatives that would achieve a level of less than significant; impacts to adequate water supplies would remain significant and unavoidable.

Cumulative Impact – Adequate Water Supplies: As described above, implementation of the proposed Project would have the potential to exceed existing water entitlements and resources, necessitate new or expanded entitlements, deplete groundwater supplies, or substantially interfere with groundwater recharge. In combination with other cumulative projects, the Project would have the potential to result in a significant cumulative impact.

Facts in Support of Finding: Many water districts that would serve cumulative project areas have prepared and adopted Urban Water Management Plans (UWMPs) and/or other planning documents that include supply and demand projections and procurement strategies to ensure a reliable water supply exists to meet the projected demand within the region. Although multiple planning documents exist to ensure a reliable water supply is available for future growth, as with project-level impacts, the combined effect of the impacts related to obtaining additional water supplies, the uncertainties inherent in obtaining those supplies, and construction impacts related to extraction, processing and/or conveyance of additional water supply results in cumulative projects having the potential to increase the demand for potable water in the region in a manner that exceeds existing entitlements and resources. Although regulations such as the California Water Code, SB 610, SB 221, Urban Water Management Planning Act, Water Conservation Projects Act, and San Diego Groundwater Ordinance, are intended to reduce impacts to water supply, impacts in the San Diego region would remain

significant and unavoidable. General Plan Update policies and Project mitigation measures would reduce cumulative impacts to water supplies, but not to below a level of significance. An additional mitigation measure as described above for project-level impacts was considered but found to be infeasible. Therefore, Project impacts to adequate water supplies would remain cumulatively considerable.

C-19 Significant Effect – Sufficient Landfill Capacity: The FEIR identifies significant impacts related to insufficient permitted landfill capacity to accommodate the Project's solid waste disposal needs.

Mitigation Measures: The mitigation measures identified in the FEIR partially mitigate the significant impact as follows:

- USS-6.1 requires the County to participate in interjurisdictional reviews to gather information on and provide comments on plans of incorporated jurisdictions and public agencies in the region. It also requires the County to work with other jurisdictions in the region to facilitate regulations to site recycling facilities. This effort will help the County and other jurisdictions to plan for solid waste disposal concurrent with need and to reduce solid waste production through increased recycling.

- USS-6.2 requires the County to review all plans for large scale projects and planned developments to ensure there is space allocation for on-site storage to separate recyclable solid waste. This measure will increase participation in recycling and reduce solid waste output.

- USS-6.3 requires the County to promote and enforce the Management of Solid Waste Ordinance requiring mandatory recycling. This measure further requires the County to evaluate the Zoning Ordinance and other County ordinances, codes and policies to allow the development of the most environmentally sound infrastructure for solid waste facilities including recycling, reuse and composting businesses. This requirement will increase recycling efforts and reduce solid waste output in the County. In addition, USS-6.3 also requires implementation of the Zoning Ordinance mandate for a Major Use Permit for new landfills to ensure the facilities are sited in accordance with the San Diego County IWMP. This regulation will help with the successful processing of new landfill projects, thereby increasing landfill capacity in the County.

- USS-6.4 is the use of Board Policy B-67 requiring the County to purchase products containing recycled and recyclable materials. Recycling efforts at County facilities will reduce future demand on County landfills and serve as an example to other land uses that generate solid waste.

- USS-6.5 requires the County to regulate refuse hauling companies through County Franchise Hauler Agreement permits and coordinate with solid waste facility

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operators to extend and/or expand existing landfill capacity by encouraging on-site materials diversion options. USS-6.5 further requires the County to develop incentives to encourage pilot projects with unincorporated area landfills to use anaerobic digesters to process organic materials currently being landfilled. This measure can promote alternative means of solid waste disposal and alleviate some demand on landfills.

- USS-6.6 requires the County to permit and regulate solid waste operators and closed solid waste disposal sites to ensure compliance with California Code of Regulations and Titles 14 and 27. This measure will ensure that landfills meet current State standards.

- USS-6.7 requires the County to maintain and monitor inactive solid waste disposal sites to ensure compliance with all applicable environmental regulations, and establish additional compatible uses for inactive solid waste sites, where possible, that generate cost-saving revenue and provide desirable community resources. This measure ensures that landfills minimize their impacts and increase their value, thereby making solid waste facilities feasible and desirable operations in the County.

- USS-6.8 requires the County to conduct recycling and composting public education programs for residents, schools, and businesses; and to develop programs to assist farmers, residents, and businesses to divert organic materials. USS-6.8 requires the County to encourage County and private contractors and developers to practice deconstruction and recycling of construction, demolition and land clearing debris. Implementation of this measure will reduce demand on solid waste facilities through alternative disposal options for the public.

The Project also includes policies in the Land Use and Conservation and Open Space Elements that address landfill capacity. The relevant policies are: LU-12.1, LU-12.2, LU-16.1, LU-16.2, LU-16.3, and COS-17.1 through COS-17.4, COS-17.6, COS-17.7 and COS-17.8. These policies require concurrency of infrastructure and services with development; require the maintenance of such services; encourage recycling facilities; and require landfill waste management, composting, methane recapture, and recycling. Adherence to these policies will further reduce impacts associated with insufficient landfill capacity from future development.

Facts in Support of Finding: If additional landfills are not constructed and existing landfills are not expanded, the Integrated Waste Management Plan Siting Element estimates that the County will run out of physical landfill capacity by 2016; however, a Needs Assessment was recently prepared in association with an Environmental Impact Statement (EIS) for Gregory Canyon Landfill in December 2012 which indicates that the capacity of landfills within San Diego County would be reached by the year 2024Regardless, additional capacity would be required to accommodate development under the Project. Therefore, the development of future land uses as designated in the

Project would have the potential to be served by landfills with insufficient capacity to accommodate the future solid waste disposal needs. General Plan Update policies and Project mitigation measures would reduce impacts to landfill capacity, but not to below a level of significance.

The following measures were also considered to reduce impacts to sufficient landfill capacity to below significant. However, the County has determined that these measures would be infeasible, as described below. Therefore, the following mitigation measures will not be implemented.

(1) Measure: Require all proposed development to obtain written verification of sufficient landfill capacity for the next 20 years.

Rationale for Rejection: This mitigation measure would prove infeasible because existing landfill facilities are not projected to have sufficient capacity to serve future demand. Therefore, this measure would impede the County's ability to implement the Project because it would prohibit future development in areas identified for increased growth in the Project. This mitigation measure would conflict with the Project objective to support a reasonable share of projected regional population growth because new development would be unable to obtain verification of adequate landfill capacity for the next 20 years and, therefore, future growth in the unincorporated County would be prohibited. .

(2) Measure: Require any proposed Project that is expected to result in an increase in solid waste disposal demand to construct a solid waste disposal facility, concurrent with development, to meet the needs of the Project.

Rationale for Rejection: This mitigation measure would prove infeasible because it places the burden of development of new solid waste disposal facilities on the developer, would require permits from local and State agencies, and would have the potential to result in environmental consequences from creating multiple solid waste facilities throughout the unincorporated County. This mitigation measure would result in significant environmental impacts from the construction of multiple solid waste facilities throughout various areas of the unincorporated County. Implementing multiple solid waste disposal sites would increase environmental degradation throughout the unincorporated County, which would contradict the Project's objective to promote environmental stewardship that protects the range of natural resources and habitats that uniquely define the County's character and ecological importance.

None of the Project alternatives would reduce impacts associated with sufficient landfill capacity to below significant. While the Environmentally Superior alternative would further reduce landfill capacity impacts, this alternative still allows development that would result in impacts that are not mitigated to a level below significant without adopting the measures noted above. In addition, this alternative would not meet the Project

objective of recognizing community and stakeholder interests while striving for consensus.

Conclusion: Because the measures listed above have been found to be infeasible; because application of all feasible mitigation and Project design measures would not achieve a level of less than significant; and because there are no feasible Project alternatives that would achieve a level of less than significant; impacts to sufficient landfill capacity would remain significant and unavoidable.

Cumulative Impact – Sufficient Landfill Capacity: As described above, implementation of the proposed Project would have potential impacts related to insufficient permitted landfill capacity to accommodate the Project's solid waste disposal needs. In combination with other cumulative projects, the Project would have the potential to result in a significant cumulative impact.

Facts in Support of Finding: Many cumulative projects, such as those proposed under adjacent city and county general plans, private projects not included in the proposed Project, or projects on tribal land, would increase solid waste disposal and management needs within the region. The existing regional landfill facilities do not have the capacity to accommodate the solid waste disposal needs of the cumulative projects. Either new landfill facilities and/or recycling facilities would be needed to meet the anticipated disposal needs. However, in many areas it is often difficult to find suitable sites to provide additional landfill facilities that would increase capacity. General Plan Update policies and mitigation measures would reduce cumulative impacts to landfill capacity, but not to below a level of significance. Additional mitigation measures as described above for project-level impacts were considered but found to be infeasible. Therefore, Project impacts to sufficient landfill capacity would remain cumulatively considerable.

Despite these unavoidable effects, a comprehensive update to the County's General Plan is still being proposed because the existing General Plan is based on outdated information and is, therefore, not considered to be a sound basis for current land use decisions.

Section D – Findings Regarding Alternatives

Section 15126.6(a) of the State CEQA Guidelines requires the discussion of "a reasonable range of alternatives to a project, or the location of a project, which would feasibly attain most of the basic objectives of the Project but would avoid or substantially lessen any of the significant effects of the Project, and evaluate the comparative merits of the alternatives." Four alternatives to the proposed Project were analyzed, including the Modified FCI Condition (Environmentally Superior alternative), Mid-density, Alpine Alternative Land Use Map and the No Project alternatives. These alternatives were compared to the impacts of the proposed

Project and are assessed relative to their ability to meet the adopted objectives of the Project. In addition, six additional alternatives were considered but rejected from further analysis in the SEIR because they (1) did not accomplish most of the basic project objectives, (2) were determined to be infeasible to implement due to their inconsistency with the 2011 General Plan or other resource constraints or, (3) were found unable to avoid the identified significant environmental impacts of the Project, pursuant to CEQA Guidelines Section 15126.6(c).

The Alpine Alternative Land Use Map alternative has been selected as the Recommended Project. These findings contrast and compare the alternatives where appropriate in order to demonstrate that the selection of the Alpine Alternative Land Use Map alternative as the Recommended Project, while still causing certain unavoidable significant environmental impacts, would result in substantial environmental, planning, public safety, economic, and other benefits. In rejecting the balance of the alternatives that were analyzed in the SEIR, the County of San Diego has examined the Project objectives and weighed the ability of each of the various alternatives to meet the objectives. The County finds that the Recommended Project best meets the Project objectives with the least environmental impact. The objectives that were adopted by the County, and which set the framework for the Project, are as follows:

1. Support a reasonable share of projected regional population growth.
2. Promote sustainability by locating new development near existing infrastructure, services, and jobs.
3. Reinforce the vitality, local economy, and individual character of existing communities while balancing housing, employment, and recreational opportunities.
4. Promote environmental stewardship that protects the range of natural resources and habitats that uniquely define the County's character and ecological importance.
5. Ensure that development accounts for physical constraints and the natural hazards of the land.
6. Provide and support a multi-modal transportation network that enhances connectivity and supports community development patterns.
7. Maintain environmentally sustainable communities and reduce greenhouse gas emissions that contribute to climate change.
8. Preserve agriculture as an integral component of the region's economy, character, and open space network.
9. Minimize public costs of infrastructure and services and correlate their timing with new development.
10. Recognize community and stakeholder interests while striving for consensus.

The following provides a summary comparison of the Recommended Project and each alternative fully analyzed in Chapter 4.0 of Volume I of the Final SEIR. The summary includes rationale as to why the Recommended Project is preferred compared to the other alternatives and why an alternative has been rejected.

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No Project Alternative

The No Project alternative assumes that the pre-FCI General Plan (the Plan in place when the FCI was enacted in 1993) land use densities apply to the former FCI lands and remain in effect. The County has determined that the sunset date of the voter-approved FCI refers to the initiative itself, which rendered the land use designations of FCI inapplicable to the Project areas beginning on January 1, 2011. As such, the No Project alternative generally allows higher densities in areas outside of the SDCWA boundary, as compared to the Recommended Project. The land use categories currently in effect on those lands previously under the FCI are not consistent with the 2011 General Plan land use categories. These inconsistent land use designations on the former FCI lands may present substantial conflicts with adjacent properties that are developed according to the 2011 General Plan land use designations. For example, the 2011 General Plan land use designations promote future development which is more sensitive to existing environmental and infrastructure constraints, particularly in the outlying areas within and near the CNF lands, than the land use designations that are in effect now (due to the 2011 General Plan not applying land use designations to the FCI lands) and would remain under the No Project alternative. Accordingly, the No Project alternative land use designations are indifferent to the environmental (i.e., biological resources, steep slopes) and infrastructure (i.e., groundwater resources) constraints of the FCI lands.

For all subject areas evaluated in the SEIR, the No Project alternative would have substantially greater and more severe environmental impacts than the Recommended Project or other alternatives analyzed (refer to Table 4-1 in Chapter 4 of Volume I of the SEIR). Moreover, the No Project alternative does not include any of the mitigation measures described in the SEIR and the Mitigation Monitoring and Reporting Program.

Since the No Project alternative would provide the greatest development potential, this alternative would best meet the first objective identified for the proposed Project, to support a reasonable share of projected regional population growth and would partially meet the eighth objective to preserve agriculture as an integral component of the region's economy, character, and open space network. However, since the No Project alternative would retain existing land use designations, primarily at semi-rural densities, this alternative would assign higher densities in remote areas away from existing infrastructure, services and jobs.

Therefore, the No Project alternative would not achieve the following eight objectives: 2) promote sustainability by locating new development near existing infrastructure, services, and jobs; 3) reinforce the vitality, local economy, and individual character of existing communities while balancing housing, employment, and recreational opportunities; 4) promote environmental stewardship that protects the range of natural resources and habitats that uniquely define the County's character and ecological importance; 5) ensure that development accounts for physical constraints and the natural hazards of the land; 6) provide and support a multi-modal transportation network that enhances connectivity and supports community development patterns; 7) maintain environmentally sustainable communities and reduce greenhouse gas emissions that contribute to climate change; 9) minimize public costs of infrastructure and

services and correlate their timing with new development; and 10) recognize community and stakeholder interests while striving for consensus.

Under the No Project alternative, increased acreages of land would be located in the eastern portion of the unincorporated County, which would promote land consumption within those portions of the County, rather than reduce it. Therefore, Objective 2 would not be met by the No Project alternative. Objectives 3 and 6 would not be met by the No Project alternative because, unlike the proposed Project, this alternative would not increase development densities within existing villages and communities, and would not reinforce the existing character and economy of local communities and the lower density semi-rural designations would not support a multi-modal transportation network, particularly pedestrian and bicycle activities. Objective 4 would not be achieved by the No Project alternative because land uses and development would be located in many undeveloped and rural eastern portions of the unincorporated County. These areas contain multiple natural resources and habitats of ecological importance and the most of the densities would not require the Conservation Subdivision Program, which requires avoidance of sensitive resources in areas subject to densities of one dwelling unit per ten acres or lower. The No Project alternative would not achieve objectives 5 or 9 because the majority of future development would be in the eastern portion of the unincorporated county, which provides limited connections to existing infrastructure and has an increased wildland fire risk. Objective 7 would not be achieved by the No Project alternative because this land use pattern would not focus growth in village centers or near existing public services and development would likely increase vehicle trips within the unincorporated county. Objective 10 would not be met by the No Project alternative, because it would not incorporate stakeholder considerations that were received during the scoping, public review, and hearing process for the proposed Project.

Therefore, the No Project alternative has been rejected because (1) it fails to meet eight of the ten project objectives, and (2) it fails to avoid, and in many instances increases, the significant environmental impacts of the Project. The Board finds that each of these reasons is sufficient on its own to justify rejecting this alternative in favor of the Recommended Project.

Modified FCI Condition Alternative

Prior to and since the adoption of the General Plan in August 2011, the County PDS Department has been working with community planning and sponsor groups, and affected property owners, to plan for the appropriate and equitable application of land use and zoning designations for the former FCI lands, while ensuring consistency with the Guiding Principles of the 2011 General Plan. Through this process, different approaches for distributing density were considered among the former FCI lands, with an emphasis on future development which is more sensitive to the environmental resources and/or constraints on the subject properties. The General Plan Update PEIR forecasted growth within the former FCI lands consistent with the zoning designations established by the voter initiative which allowed one dwelling unit per 40 acres (1:40). The forecasted growth within the 2011 General Plan is approximately 235 fewer dwellings units (DUs) than the proposed Modified FCI Condition alternative. The additional development potential proposed by the Modified FCI Condition alternative is primarily located in

the Alpine CPA as an eastern extension to the existing Alpine Village. This alternative was developed in response to public comments received during the public review period for the SEIR in 2013 and the NOP public review period to allow for additional growth in this area, while avoiding impacts with CNF lands by retaining lower densities adjacent to and in the vicinity of CNF lands.

Based on the recommendations in comment letters responding to the NOP and public review comment letters received during review of the Draft SEIR circulated in 2013, a Modified FCI Condition alternative land use map was created (Volume I, Chapter 4, Figures 4-1.1A through 4-1.13). The Modified FCI Condition Land Use Map and the Recommended Project Land Use Map are the same for the following communities: Desert, Mountain Empire, North Mountain, Pendleton-DeLuz, Pine Valley, and Ramona. However, the Modified FCI Condition alternative would support buildout of approximately 4,521 residential DUs, or approximately 1,214 less than the Recommended Project land use map.

When compared to the Recommended Project Land Use Map, the Modified FCI Condition Land Use Map would assign 2,331 additional acres as Semi-Rural and increase the amount of Rural Lands by 2,746 acres. In addition, this map would assign 167 less acres of Village Residential and 152 less acres of Village Core Mixed Use (VCMU) land uses than the Recommended Project land use map. The areas that would experience substantial increases in the Rural Lands designations under this alternative, and therefore less residential buildout compared to the Recommended Project land use map, include Descanso Subarea (1,666 acres), Alpine CPA (740 acres); and Jamul/Dulzura Subregion (242 acres).

The Modified FCI Condition alternative would achieve all ten of the Project objectives to some extent. When compared to the Recommended Project, the Modified FCI Condition alternative would better fulfill four of the Project objectives identified below because of the lower overall development potential, particularly in the Alpine CPA and in certain instances adjacent to CNF lands. However, the Recommended Project also fulfills these four objectives below, while better fulfilling other Project objectives.

- 4) Promote environmental stewardship that protects the range of natural resources and habitats that uniquely define the County's character and ecological importance;
- 5) Ensure that development accounts for physical constraints and the natural hazards of the land;
- 8) Preserve agriculture as an integral component of the region's economy, character, and open space network; and
- 9) Minimize public costs of infrastructure and services and correlate their timing with new development.

The Recommended Project contemplates land use designations consistent with Project objectives because it also assigns low density land uses in remote areas of the unincorporated county, while providing nearly all the potential growth in an area within or adjacent to an area with infrastructure, the community of Alpine, which is not remote, nor far from services and jobs

or employment opportunities. Therefore, the Recommended Project would better fulfill the following six Project objectives than the Modified FCI Condition alternative:

- 1) *Support a reasonable share of projected regional population growth*. The development capacity of the Recommended Project is greater (5,735 additional future DUs) than the Modified FCI Condition alternative (4,521 additional future DUs).
- 2) *Promote sustainability by locating new development near existing infrastructure, services, and jobs*. As discussed above, the Recommended Project generally limits future growth to the Alpine CPA in areas within or adjacent with infrastructure and services.
- 3) *Reinforce the vitality, local economy, and individual character of existing communities while balancing housing, employment, and recreational opportunities*. The Recommended Project would allow for greater development potential in the Alpine CPA, which would allow for a greater population base to support a broader range of community facilities, particularly a new high school.
- 6) *Provide and support a multi-modal transportation network that enhances connectivity and supports community development patterns*. Generally development patterns in the remote Project areas of the FCI lands do not support a multi-modal transportation network; however, the Recommended Project assigns a Village Core Mixed Use designation to an area in Alpine as an extension of the existing Alpine Village. These compact development patterns facilitate a mix of land uses at densities that support a multi-modal transportation network.
- 7) *Maintain environmentally sustainable communities and reduce greenhouse gas emissions that contribute to climate change*. While both Recommended Project and the Modified FCI Condition alternative would minimize development in remote areas, which would reduce vehicle miles traveled and, thereby minimize GHG emissions. However, the Recommended Project would also allow for additional compact development potential in the Alpine CPA east of Viejas Casino in an area designated village core Mixed Use.
- 10) *Recognize community and stakeholder interests while striving for consensus*. Both the Recommended Project and Modified FCI Condition recognize the interests of environmental stakeholders by assigning low density land use designations in the remote areas of the unincorporated county; however, the Recommended Project more fully recognizes the interests of the Alpine community to allow a greater population base that would support a broader range of services in the community.

Therefore, the Modified FCI Condition alternative has been rejected because, while it would meet Project objectives to some extent, it would not meet them to the same extent as the Recommended Project because the Recommended Project would better meet six of the ten Project objectives.

Mid-density Alternative

The Mid-density alternative land use map is based on an analysis of the consistency of the 2012 Initial Draft Land Use Map with the 2011 General Plan Update's policies and planning principles

as well as issues raised in public comment letters on the Draft SEIR circulated for public review in 2013. Based on these comment letters, staff identified several areas of consideration for further analysis. In formulating a recommendation for each area, County staff considered factors such as existing land use and parcel sizes, conformance with the Community Development Model, access to a public road, the extent of physical and environmental constraints, and proximity to environmentally sensitive CNF lands.

Volume I, Chapter 4, Tables 4-2, 4-3, and 4-4 include a comparison of the Mid-density alternative to the Recommended Project (Alpine Alternative Land Use Map) and the other alternatives. As shown in Table 4-4 the Mid-density alternative would result in buildout of less dwelling units than the Recommended Project in the Alpine CPA and Central Mountain Subregion. The land use designations assigned by the Recommended Project and Mid-density Land Use Maps are the same for all communities with the exception of Alpine, Cuyamaca, and Palomar Mountain. The Mid-density alternative land use maps are provided in Volume I, Chapter 4 on Figures 4-2.1A through 4-2.13.

The Mid-density alternative land use designations are less intensive than the Recommended Project land use map and would result in similar but reduced environmental impacts. This alternative would support buildout of approximately 5,589 residential DUs, or approximately 146 less than the Recommended Project. When compared to the Recommendation Project, the Mid-density alternative would assign 91 additional acres as Semi-Rural and 98 less acres as Rural Lands. In addition, this map would assign a lower density to the VCMU land uses than the Recommended Project land use map (10.9 rather than 14.5 DUs per acre).

Both the Recommended Project and Mid-density alternative assign land use designations consistent with Project objectives because they both assign low density land use designations in remote areas of the unincorporated county, but allow for additional growth in the community of Alpine, which is not remote, nor far from services, jobs or employment opportunities. However, the Mid-density alternative would permit less growth within and adjacent to the CNF in remote areas of the Cuyamaca Subarea and Alpine CPA. When compared to the proposed Project, the Mid-density alternative would better fulfill the fourth and fifth Project objectives:

- 4) *Promote environmental stewardship that protects the range of natural resources and habitats that uniquely define the County's character and ecological importance*. The Mid-density alternative assigns lower density Rural Lands designations in the environmentally constrained Japatul Valley area of the Alpine CPA and in the Central Mountain Subregion.
- 5) *Ensure that development accounts for physical constraints and the natural hazards of the land*. As discussed above, the Mid-density alternative assigns lower density Rural Lands designations in the Japatul Valley area of the Alpine CPA and in the Central Mountain Subregion where there are very high risks of wildland fires.

As with the Recommended Project, the Mid-density alternative contemplates land use designations consistent with Project objectives because it also assigns low density land uses in remote areas of the unincorporated county, while providing nearly all except for the potential

growth in an area of the Alpine CPA within or adjacent to an area with infrastructure and services. However, the Recommended Project would better fulfill the following Project objectives than the Mid-density alternative based on the rationale provided below.

- 1) *Support a reasonable share of projected regional population growth*. The development capacity of the Recommended Project is greater (5,735 additional future dwelling units) than the Mid-density alternative (5,589 additional future dwelling units).
- 2) *Promote sustainability by locating new development near existing infrastructure, services, and jobs*. While both alternatives generally limit future development to the area in the Alpine CPA as an extension to the existing Alpine Village, the Recommended Project assigns higher density Village densities to promote compact development patterns that will support additional community services.
- 3) *Reinforce the vitality, local economy, and individual character of existing communities while balancing housing, employment, and recreational opportunities*. While both the Recommended Project and Mid-density alternative would allow for greater development potential in the Alpine CPA, the Recommended Project would allow for a greater population base to support a broader range of community facilities and employment opportunities.
- 6) *Provide and support a multi-modal transportation network that enhances connectivity and supports community development patterns*. Generally development patterns in the remote Project areas of the FCI lands do not support a multi-modal transportation network; however, the Recommended Project assigns a higher density to the Village Core Mixed Use designated-area in Alpine, which will result in more compact development patterns to facilitate a mix of land uses at densities that support a multi-modal transportation network.
- 7) *Maintain environmentally sustainable communities and reduce greenhouse gas emissions that contribute to climate change*. While both Recommended Project and the Mid-density alternative would minimize development in remote areas, which would reduce vehicle miles traveled and, thereby minimize GHG emissions. However, the Recommended Project would also allow for more a compact development pattern of development in the Alpine CPA east of the Viejas Casino.
- 8) *Preserve agriculture as an integral component of the region's economy, character, and open space network.* The Mid-density and Recommended Project assign the same number of agricultural lands at Semi-rural and at Rural Lands designations; however, the Recommended Project assigns lower density semi-rural designations in the Alpine CPA south of Interstate 8 and east of the Alpine Village.
- 9) *Minimize public costs of infrastructure and services and correlate their timing with new development*. In the area east of the Alpine Village, south of Interstate 8, the semi-rural land use designations of the Recommended Project have a lower density than those of the Mid-density alternative and will require less infrastructure expansion.
- 10) *Recognize community and stakeholder interests while striving for consensus*. Both the Recommended Project and Mid-density alternative recognize the interests of environmental stakeholders by assigning low density land use designations in the remote areas of the unincorporated county; however, the Recommended Project more

fully recognizes the interests of the Alpine community to allow a greater population base that would support a broader range of services in the community.

Therefore, the Mid-density alternative has been rejected because, while it would meet Project objectives to some extent, it would not meet them to the same extent as the Recommended Project because the Recommended Project would better meet eight of the ten Project objectives.

Proposed Project

The Recommended Project proposes the same land use designations as the proposed Project for all communities, with the exception of the Alpine CPA. Within the Alpine CPA, the Recommended Project proposes different land use designations than the proposed Project in three areas as described below. (See Recommended Project Figures 1 through 13 in Volume III of this SEIR.)

- Eastern Alpine, south of the Viejas Reservation (1,095 acres) — This area, south of Interstate 8 and adjacent to the Cleveland National Forest to the south and east, assigns either Semi-rural 4 (1:4 acres), or Rural Lands 40 (1:40 acres) under the Alpine Alternative rather than Rural Commercial, Village Residential 2 (2:1 acre), Semi-rural 1 (1:1 acre), Semi-rural 2 (1:2 acre), Semi-rural 10 (1:10 acres), or Rural Lands 20 (1:20 acres) under the proposed Project. The potential buildout of the Recommended Project (201 dwelling units) is 460 dwelling units less than under the proposed Project (661 dwelling units).
- East of Rancho Palos Verde (40 acres) — Two parcels would be assigned Rural Lands 40 (1:40 acres) rather the Semi-rural 2 (1:2 acres) assigned under the proposed Project. This would reduce the potential buildout from 14 dwelling unit under the proposed Project to two dwelling units under the Recommended Project.
- Japatul Valley — (1,362 acres) — The Alpine Alternative proposes Rural Lands 40 (1:40 acres) for 16 parcels rather than Rural Lands 20 (1:20 acres) assigned under the proposed Project. This different land use designation would reduce the potential buildout of these parcels from 64 dwelling units under the proposed Project to 32 dwelling units under the Recommended Project.

The Recommended Project land use designations are less intensive and would accommodate less development than the proposed Project and would generally result in similar but reduced environmental impacts. The Recommended Project would support buildout of approximately 5,735 residential DUs, or approximately 510 less DUs than the proposed Project. When compared to the proposed Project, the Recommended Project would assign 206 additional acres as Rural Lands, but would assign 24 less acres as Village Residential, 174 less acres as Semi-rural, and seven less acres as Rural Commercial.

The Recommended Project proposes greater residential development densities and number of residential dwelling units than the Mid-density and Modified FCI Condition alternatives, but less development density and fewer residential dwelling units than the proposed Project. In some

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cases the Recommended Project would result in similar impacts to the Mid-density and Modified FCI Condition alternatives but impacts are often reduced or less significant than the proposed Project.

As with the proposed Project, the Recommended Project would also achieve all ten Project objectives. Both the proposed Project and the Recommended Project assign land use designations consistent with Project objectives because they both assign low density land use designations in remote areas of the unincorporated county, but allow for additional growth in the community of Alpine, which is not remote, nor far from services, jobs or employment opportunities. However, the Recommended Project would permit less growth in the Alpine CPA. Therefore, when compared to the Recommended Project, the proposed Project would better fulfill the first through third Project objectives:

- 1) *Support a reasonable share of projected regional population growth*. The development capacity of the proposed Project is greater (6,245 additional future dwelling units) than the Recommended Project (5,735 additional future dwelling units).
- 2) *Promote sustainability by locating new development near existing infrastructure, services, and jobs*. While both alternatives generally limit future development to the area in the Alpine CPA as an extension to the existing Alpine Village, the proposed Project assigns more acres of Village and Semi-rural densities in some areas, which will result in a greater expansion of the existing Alpine Village, which will better facilitate the expansion of the infrastructure because the additional development potential will result in a lower cost per dwelling unit.
- 3) *Reinforce the vitality, local economy, and individual character of existing communities while balancing housing, employment, and recreational opportunities*. While both the proposed Project and Alpine Alternative would allow for greater development potential in the Alpine CPA, the proposed Project would allow for a greater population base to support a broader range of community facilities and employment opportunities.

Both the proposed Project and Recommended Project would meet the sixth Project objective: Provide and support a multi-modal transportation network that enhances connectivity and supports community development patterns. Both assign a 14.5 dwelling unit per acre density to the Village Core Mixed Use designated-area in Alpine, which will result in compact development patterns to facilitate a mix of land uses at densities that support a multi-modal transportation network.

When compared to the proposed Project, the Recommended Project would better fulfill the following six Project objectives:

- 4) *Promote environmental stewardship that protects the range of natural resources and habitats that uniquely define the County's character and ecological importance*. The Recommended Project assigns lower density Rural Lands designations in the environmentally constrained Japatul Valley area of the Alpine CPA.
- 5) *Ensure that development accounts for physical constraints and the natural hazards of the land*. In the Alpine CPA the Recommended Project assigns lower density Rural

Lands designations in the Japatul Valley area and lower density Semi-rural designations in eastern Alpine where there are very high risks of wildland fires.

- 7) *Maintain environmentally sustainable communities and reduce greenhouse gas emissions that contribute to climate change*. Both the Recommended Project and proposed Project would minimize development in remote areas; however, the Recommended Project would reduce vehicle miles traveled more than the proposed Project.
- 8) *Preserve agriculture as an integral component of the region's economy, character, and open space network.* The proposed Project and Recommended Project assign the same number of agricultural lands at Semi-rural and at Rural Lands designations; however, the Recommended Project assigns lower density semi-rural densities in the Alpine CPA south of Interstate 8, east of the Alpine Village.
- 9) *Minimize public costs of infrastructure and services and correlate their timing with new development*. In the area east of the Alpine Village, south of Interstate 8, the semi-rural land use designations of the Recommended Project have a lower density than those of the proposed Project and will require less infrastructure expansion.
- 10) *Recognize community and stakeholder interests while striving for consensus*. Both the proposed Project and Recommended Project recognize the interests of environmental stakeholders by assigning low density land use designations in the remote areas of the unincorporated county; however, the Recommended Project more fully recognizes the concerns of environmental stakeholders by assigning lower land use densities in eastern Alpine, where there is a high risk of wildland fires.

Therefore, the proposed Project has been rejected because, while it would meet Project objectives to some extent, it would not meet them to the same extent as the Recommended Project because the Recommended Project would better meet six of ten Project objectives.

Conclusion

Although the proposed Project and the Mid-density and Modified FCI Condition alternatives would be consistent with all of the Project objectives, the Recommended Project more fully meets more of the Project objectives than these alternatives. Pursuant to CEQA Guidelines Section 15093, therefore, the County adopts the Statement of Overriding Considerations and rejects the proposed Project and the Mid-density and Modified FCI Condition alternatives because specific economic, legal, social, technological or other considerations make these alternatives infeasible and because they Project objectives are better met by the Recommended Project.

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Attachment D-3
Environmental Findings

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Statement of Overriding Considerations
for the
Forest Conservation Lands Initiative
General Plan Amendment

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DRAFT STATEMENT OF OVERRIDING CONSIDERATIONS
FOR THE FOREST CONSERVATION LANDS INITIATIVE GENERAL PLAN AMENDMENT
SCH # 2012081082

The Findings required under the California Environmental Quality Act ("CEQA") (Public Resources Code sections 21000 *et seq*.) and the CEQA Guidelines (California Code Regulations, title 14, section 15000 *et seq*.) supporting the approval of the County of San Diego ("County") Forest Conservation Lands Initiative (FCI) Project conclude that the County's approval of the Project would result in significant impacts that cannot be substantially lessened or avoided. Despite these impacts, the County of San Diego Board of Supervisors chooses to approve the FCI Project because specific economic, social and other benefits of the Project outweigh and override these significant and unavoidable impacts.

The County has adopted all feasible mitigation measures with respect to the significant unavoidable environmental impacts listed below. In addition, the County has analyzed a reasonable range of alternatives to the proposed Project. Based on the analysis, the County has determined that the Alpine Alternative Land Use Map alternative meets the objectives of the Project and is feasible and environmentally preferable to the proposed Project. Therefore the County is adopting the Alpine Alternative Land Use Map alternative as the Recommended Project for the FCI Lands GPA, and sets forth this Statement of Overriding Considerations for its adoption despite the significant and unavoidable environmental impacts identified in the EIR and noted below, as follows:

SIGNIFICANT UNAVOIDABLE ENVIRONMENTAL IMPACTS

FEIR Section	Subject/Issue
2.1.3.3	Visual Character or Quality
2.1.3.4	Nighttime Lighting Effects to Dark Skies
2.2.3.1	Conversion of Farmland
2.2.3.3	Indirect Conversion of Farmland
2.3.3.2	Air Quality Violations
2.3.3.3	Non-Attainment Criteria Pollutants
2.3.3.4	Air Quality Effects to Sensitive Receptors
2.4.3.1	Special Status Plant and Wildlife Species
2.4.3.2	Riparian Habitat and Other Sensitive Natural Communities
2.4.3.4	Wildlife Movement Corridors
2.7.3.8	Wildland Fires
2.8.3.1	Water Quality Standards and Requirements
2.8.3.2	Groundwater Supplies and Recharge
2.9.3.1	Mineral Resource Availability
2.9.3.2	Mineral Resource Recovery Sites
2.10.3.3	Permanent Increase in Ambient Noise Levels
2.11.3.3	School Services
2.13.3.1	Unincorporated County Traffic and Level of Service Standards
2.13.3.2	Adjacent Cities Traffic and Level of Service Standards
2.13.3.3	Rural Road Safety

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FEIR Section	Subject/Issue
2.14.3.4	Adequate Water Supplies
2.14.3.6	Sufficient Landfill Capacity
2.15.3.1	Compliance with Assembly Bill (AB) 32
2.15.3.2	Potential Effects of Global Climate Change on the Project

Each of the reasons for approval cited below is a separate and independent basis that justifies approval of the FCI Lands GPA. Thus, even if a court were to set aside any particular reason or reasons, the Board of Supervisors finds that it would stand by its determination that each reason, or any combinations of reasons, is a sufficient basis for approving the FCI Lands GPA notwithstanding the significant and unavoidable impacts that may occur.

The substantial evidence supporting the various benefits can be found in both the CEQA Findings Regarding Significant Effects for the General Plan Update PEIR and the FCI Lands SEIR, the Final EIRs for both the General Plan Update PEIR and the FCI Land's SEIR and in the Record of Proceedings for the FCI Lands SEIR.

STATEMENT OF OVERRIDING CONSIDERATIONS

The County finds that the Recommended Project (hereinafter referred to as the "Project") would have the following economic, social, legal and other benefits:

1. The Project provides a strategic framework to accommodate a reasonable share of projected regional population growth at intensities that are appropriate with respect to existing development, environmental resources, community character, available services, and available infrastructure.

2. The Project promotes sustainable development through goals and policies that balance the need for adequate infrastructure, housing, and economic vitality with the need for resource management, environmental protection, and preservation of quality of life for residents in the unincorporated County.

3. The Project implements the Community Development Model, which concentrates development at the central core surrounded by areas of lesser intensity; thereby avoiding urban sprawl and minimizing land consumption while maintaining open space, habitat, recreation, agriculture, and other uses associated with rural areas.

4. The Project provides a realistic land use map that accounts for existing development, physical constraints, hazards, and incompatible uses and assigns densities and use types accordingly to ensure that communities and neighborhoods remain safe and livable.

5. The Project improves mobility through the development of a multi-modal transportation network that enhances connectivity, supports community development patterns, limits traffic congestion, promotes public and alternative

transportation methods, and supports the goals of adopted regional transportation plans.

6. The Project directs the preservation and environmental stewardship of the County unincorporated area's vast array of natural, cultural and historic resources that uniquely define the character and ecological importance of the region.

7. The Project addresses adverse environmental effects associated with global climate change by facilitating sustainable development, promoting energy efficiency, and reducing greenhouse gas emissions county-wide.

8. The Project expands opportunities and outcomes for children by providing a healthy and safe physical environment while supporting recreational opportunities and land use patterns that encourage a healthy lifestyle.

9. The Project improves public safety by locating future development closer to fire stations, reducing the potential for wildland-urban interface, providing for essential public facilities and services, and establishing goals and policies that minimize hazards and threats to personal safety and property.

10. The Project is the product of a comprehensive public planning effort including input from 20 public community planning group meetings, SB 18 and AB 52 Tribal Consultations, and continual input and refinements through public comments and public hearing testimony that resulted in a thoughtful balance of stakeholder, community, and environmental interests.

11. The Project minimizes public costs of infrastructure and services by correlating their construction with the timing of residential, commercial and industrial development, thereby allowing taxpayer dollars to be spent more efficiently.

12. The Project enhances the local economy and provides opportunities for future jobs and business development commensurate with forecasted growth by planning for commercial development near existing businesses, transportation hubs and walkable residential areas. Moreover, the Project promotes continued agricultural production as an integral part of the region's economy by placing appropriate densities and compatible use types in prime farmland areas.

For the foregoing reasons, the County finds that the Project's unavoidable potential significant environmental impacts are outweighed by these considerable benefits.

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Attachment E

SB-52 Consultation
(meeting notes)

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Meeting Record

Project Name (Case numbers)	Meeting Chair	Meeting Date
Forest Conservation Initiative (FCI); PDS2012-GPA-12-004; AB-52; NA Consultation - Rincon	Donna Beddow	3/28/2016

Action Items:

Action to be taken:	Responsible Party	Due date
1. No action required.		
2.		
3.		
4.		
5.		
6.		

Discussion:

1. Planning document to incorporate approximately 71,700 acres of former FCI lands and 400 acres of unincorporated lands adjacent to FCI lands into the General Plan.
2. No earth disturbing activities proposed.
3. Subsequent discretionary permits will require CEQA review and consultation.
4.
5.

Copy of Record provided to all?	Results of meeting summarized?	Signature of meeting chair
Yes	**Yes**	

Meeting Record

Project Name (Case numbers)	Meeting Chair	Meeting Date
Berk; PDS2013-TM-5577 H&J Devco; PDS2015-TPM-21229 Harmony Grove Village South; PDS2015-DP-15-002 Jackson Ranch; PDS2013-TPM-21203 Lilac Plaza; PDS2015-GPA-15-003 Newland Sierra; PDS2015-SP-15-001 North County Environmental; PDS2008-3500-08-015 Park Circle; PDS2015-TM-5603 Private Horse Keeping; PDS2013-LDGRMJ-00015 Savage; PDS2015-TPM-21221 Sringeri Vidya Bhatari Foundation; PDS2015-MUP-15-011 Steeve; PDS2015-TPM-21225 Tomlinson; PDS2012-3100-5573 Valley Center Tractor Supply; PDS2015-MUP-15-029 Verizon Double Peak; PDS2015-MUP-15-003 Wilkes; PDS2014-AD-14-030	Donna Beddow	3/28/2016

Attendance Roster

Name	Phone Number(s)	E-mail
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Rose Duro	760-297-2635	rduro@rincontribe.org
Vincent Whipple	760-297-2635	vwhipple@rincontribe.org

Meeting Record

Project Name (Case numbers)	Meeting Chair	Meeting Date
Forest Conservation Initiative; PDS2012-GPA-12-004 PDS2012-3800-12-005 Viejas Consultation – AB-52	Donna Beddow	2/1/2016

Action Items:

Action to be taken:	Responsible Party	Due date
1. No action required.		
2.		
3.		
4.		
5.		
6.		
7.		

Other:

Requests/Discussion:
1. Staff presented an overview of the project.
2. Plan-to-Plan project. There is no development on the ground. Re-categorization of land use categories.
2. Subsequent discretionary projects would undergo CEQA review and consultation, as required.
3. Prior SB-18 consultation with Viejas.

Copy of Record provided to all?	Results of meeting summarized?	Signature of meeting chair
Yes	**Yes**	*Donna Beddow*

Meeting Record

Project Name (Case numbers)	Meeting Chair	Meeting Date
Project Specific Request GPA; PDS2012-3800-12-005 Forest Conservation Initiative GPA; PDS2012-GPA-12-004 Barrett Junction; PDS2014-MUP-14-020 Blue Bird Canyon; PDS2014-MUP-14-047 Brook Forest; PDS2014-LDGRMJ-00003 Camp Cedar Glen; PDS2011-3301-72-490-06 (MUP) College Prep Middle School; PDS2015-MUP-15-006 Daily Disposal Equipment Supply; PDS2011-3500-11-011 (STP) East County Sand Mine; PDS2009-3300-09-016 (MUP) El Monte Nature Preserve; PDS2015-MUP-98-014W2 Lake Jennings Market Place; PDS2013-GPA-14-005 Lakeside River Park Conservancy; PDS2014-LDGRMJ-00012 Lansing; PDS2012-2700-15676 Liberty High School; PDS2015-MUP-15-027 Lilac Plaza; PDS2015-GPA-15-003 Marilla Park; PDS2014-TM-5591 Otay Hills Aggregate; PDS2010-3813-10-002 (SPA) Peacock Hills; PDS2015-TM-5598 Peck-Jamul; PDS2015-TPM-21223 Pio Pico Campground; PDS2004-3300-04-047 (MUP) Rancho Librado; PDS2014-GPA-14-007 Riker Ranch; PDS2014-TM-5592 Simpson Farms; PDS2005-3100-5460 (TM) Sweetwater Village; PDS2014-GPA-14-003 Terrace Hill; PDS2015-TM-5599 Verizon 94 Mountain Empire; PDS2015-MUP-15-002 Verizon I-8; PDS2014-STP-14-011 Verizon La Cresta; PDS2014-MUP-14-034 Wilkes; PDS2014-AD-14-030	Donna Beddow	11/24/2015

Attendance Roster

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Bob Citrano	858-694-3229	bob.citrano@sdcounty.ca.gov

Attachment F

FCI Staff Report for October 18, 2013 (1) Planning Commission Meeting

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The County of San Diego

Planning Commission Hearing Report

Date:	October 18, 2013	**Case/File No.:**	Forest Conservation Initiative Lands GPA; GPA 12-004; 3800 12-004
Place:	County Conference Center 5520 Overland Avenue San Diego, CA 92123	**Project:**	Forest Conservation Initiative (FCI) Lands General Plan Amendment
Time:	9:00 am	**Location:**	Districts All
Agenda Item:	#1	**General Plan:**	Various
Appeal Status:	Board of Supervisors is the final decision-maker	**Zoning:**	Various
Applicant/Owner:	County of San Diego	**Communities:**	Alpine, Central Mountain, Desert, Jamul/Dulzura, Julian, Mountain Empire, North Mountain, Pendleton-DeLuz, Ramona
Environmental:	Supplemental EIR	**APN'S:**	Various

A. EXECUTIVE SUMMARY

1. Requested Actions

This is a request for the Planning Commission to evaluate this proposed General Plan Amendment (GPA) and make recommendations to the Board of Supervisors. The GPA, directed by the Board of Supervisors in December 2010, proposes land use changes to approximately 71,600 acres of the former Forest Conservation Initiative (FCI) lands. In addition, the GPA proposes changes to zoning when necessary for consistency with a change in General Plan designation and minor FCI associated changes to the General Plan Land Use and Mobility Elements, Central Mountain, Jamul/Dulzura, North Mountain Subregional Plans, and the Alpine Community Plan. Finally, the Forest Conservation Initiative Appendix would be removed from the General Plan.

If the required findings can be made, the Department recommends that the Planning Commission take the following actions:

A. Find that it has reviewed and considered the information contained in the Final Program Environmental Impact Report (EIR), dated August 3, 2011 on file with Planning & Development Services (PDS) as Environmental Review Number 02-ZA-001, and the Draft Supplemental EIR thereto, dated October 2013 on file with PDS as GPA 12-004, prior to making its recommendation on the GPA.

B. Recommend that the Board of Supervisors adopt the Resolution (Attachment A) to amend the County of San Diego General Plan.

C. Recommend that the Board of Supervisors adopt the attached Form of Ordinance:

AN ORDINANCE CHANGING THE ZONING CLASSIFICATION OF CERTAIN PROPERTY WITHIN THE COUNTY OF SAN DIEGO RELATED TO THE FOREST CONSERVATION INITIATIVE LANDS GENERAL PLAN AMENDMENT [GPA 12-004] (Attachment C)

2. Required Findings to Support Requested Actions

A. Is the proposed GPA in compliance with the California Government Code? (Pages 8,12, 13)

B. Is the proposed GPA consistent with the vision, goals, and polices of the General Plan and its community and subregional plans? (Pages 7-9)

C. Does the GPA comply with the California Environmental Quality Act (CEQA)? (Pages 9-10)

B. PROPOSAL

1. Background

A. In 1993, San Diego County voters passed the Forest Conservation Initiative (FCI), which required 40-acre minimum lot sizes on approximately 71,600 acres of private lands within the Cleveland National Forest (CNF). Voters endorsed the FCI to prevent further encroachment by development into the CNF, which once was nearly two million contiguous acres. Today the CNF is 424,000 acres; 286,000 acres of which are in San Diego County[1].

B. The FCI expired on December 31, 2010. Upon expiration, the General Plan land use designations for FCI lands reverted back to the land use designations in place prior to 1993. Due to the timing of the FCI expiration, FCI lands were not included in the 2011 General Plan Update. The current mapping of the FCI lands is therefore not consistent with the General Plan planning objectives; in particular, the General Plan Community Development Model, which seeks to located low and very low densities around a compact central village core.

On December 8, 2010, the Board of Supervisors directed staff to prepare a GPA for the FCI lands consistent with the appropriate General Plan Update land use designations. On March 16, 2011, staff also confirmed to the Board that land use changes would be considered on adjacent parcels when changes in circumstances would warrant new land use designations.

Two other County-initiated GPAs: General Plan Clean-up (GPA 12-007) and Property Specific Requests (PSRs) GPA (GPAs 12-005 and 12-012) are also currently being processed. The Clean-up is anticipated for Planning Commission consideration in late 2013 and the PSRs in 2016.

2. GPA Description

A. Scope

This GPA includes proposed revisions to the General Plan land use map, Zoning Ordinance, Land Use and Mobility Elements, and four community and five subregional plans, along with removal of the Forest Conservation Initiative Appendix to the General Plan. The proposed revisions are shown in Attachment B and briefly described below.

i. Land Use Map — This GPA proposes to redesignate former FCI lands within the CNF with land use designations that are consistent with the guiding principles and policies of the adopted General Plan. In addition, the GPA proposes changes to approximately 400 acres

[1] Union Tribune, Cleveland National Forest Needs Protection, Art Madrid & Duncan McFetridge, May 17, 2013

of adjacent private lands based on a change in circumstances, such as a new high school that is now planned for the Alpine Community. Changes to non-FCI lands will ensure that the anticipated uses consider any changed circumstances and are consistent with the changes being proposed for the former FCI lands.

Land use map revisions are proposed for the Alpine, Julian, Pendleton-DeLuz, and Ramona Community Planning Areas, and the Central Mountain, Desert, Jamul/Dulzura, Mountain Empire, and North Mountain Subregions. Land use maps are provided as Appendix 1 to Attachment B.

ii. Zoning — A total of 329 of the more than 4,000 parcels require changes to zoning to maintain consistency between the General Plan and Zoning Ordinance. The changes correspond to land use designation changes. Attachment C includes proposed changes to the Zoning Ordinance.

iii. Land Use Element — Proposed changes to the Land Use Element are described in Attachment B, Chapter III, and include.

a) Land Use Designations — Remove the "*Forest Conservation Initiative Lands*" designation included under the *Other Land Use Designations* section.

b) Regional Categories Map — Revise Figure LU-1, Regional Categories Map, to assign a Regional Category to the former FCI lands, which are currently shown as "Forest Conservation Initiative Overlay".

iv. Mobility Element — The Traffic Impact Assessment Analysis (TIAA) prepared as part of the Draft Supplemental Environmental Impact Report (SEIR) determined that this GPA would only have a significant impact on roads in the Alpine community where road segments are forecast to change from a level of service (LOS) D or better to LOS E or F with buildout of the Land Use Map (Draft SEIR is provided as Attachment D). The proposed changes to the Mobility Element are provided in Attachment B, Chapter IV and are based on the recommendations of the Alpine CPG.

This GPA proposes to change the classification of a segment of Willows Road in Alpine from a two-lane 2.2E Light Collector to a four-lane 4.2B Boulevard with Intermittent Turn Lanes. In addition, this GPA would add the following road segments to Mobility Element Table M-4, Road Segments Where Adding Travel Lanes is not Justified.

a) Alpine Boulevard
- Tavern Road to Boulder Road.
- Louise Drive to South Grade Road.
- South Grade Road to West Willows Road.
- West Willows Road to Willows Road at I-8 exit 36.

b) South Grade Road (Eltinge Drive to Olive View Road).

v. Community and Subregional Plans — This GPA includes minor amendments to the Alpine Community Plan as well as the Central Mountain, Jamul/Dulzura and North Mountain Subregional Plans. The proposed amendments to community and subregional plans are briefly described below and shown in strikeout-underline in Attachment B, Chapter V.

a) *Alpine Community Plan*
- Village boundary map revisions to reflect new Village Regional Category land use map changes.
- Text and policy revisions to recognize the requirement to expand water and sewer service areas.

b) *Central Mountain Subregional Plan*
- Descanso and Pine Valley Rural Village boundary map revisions to replace FCI land use designations.
- Allocation of land use designations table revisions to remove references to FCI.

c) *Jamul/Dulzura Subregional Plan* — Revisions for two policies to remove the reference to FCI.

d) *North Mountain Subregional Plan* — A new overlay for multi-use communication structures.

vi. Forest Conservation Initiative Appendix — The GPA will also remove the FCI Appendix from the General Plan, (see Attachment B, Chapter VII).

B. GPA Alternatives

Five land use map alternatives developed through the planning process for this GPA. The Planning Commission can recommend one, or any combination of, these alternatives. Table B-1 compares the residential buildout potential for the five different alternatives described below.

Table B-1: GPA Alternatives Buildout ScenariosNOTE

Communities	FCI Condition[1]	No Project	Draft Map	Modified Project	Staff Recommendation
Alpine	**1,382**	**2,721**	**3,830**	**2,087**	**2,893**
Central Mountain	**1,178**	**5,604**	**1,065**	**1,032**	**1,051**
Cuyamaca	110	274	110	88	98
Descanso	606	1,376	618	609	618
Pine Valley	324	2,813	227	227	227
Unrepresented	138	1,141	110	108	108
Desert	**4**	**9**	**2**	**2**	**2**
Jamul-Dulzura	**64**	**193**	**67**	**53**	**58**
Julian	**386**	**2,547**	**389**	**389**	**389**
Mountain Empire	**49**	**311**	**58**	**45**	**51**
Campo/Lake Morena	46	291	55	42	48
Unrepresented	3	20	3	3	3
North Mountain	**991**	**4,148**	**900**	**899**	**894**
Palomar Mountain	855	3,024	798	797	792
Unrepresented	136	1,124	102	102	102
De Luz	**24**	**221**	**24**	**22**	**18**
Ramona	**160**	**240**	**181**	**181**	**181**
Grand Total	**4,238**	**15,994**	**6,516**	**4,710**	**5,537**

NOTE: The dwelling unit totals for FCI Condition, No Project, and Draft Map are slightly different than the totals reported in the Draft SEIR. However, this table is intended primarily for comparison purposes to show the differences between these five land use alternatives.

i. Forest Conservation Initiative Condition — The FCI imposed 40-acre minimum lot size on all parcels within the CNF and outside of county towns. While the FCI expired at the end of 2010, it is an alternative in this staff report as it most closely resembles what was analyzed under the 2011 General Plan Update.

ii. Existing General Plan — This is the current General Plan land use designations on County lands, and is also the No Project Alternative for the GPA's SEIR. When the FCI expired, the lands that were subject to the FCI reverted back to the land use designations in effect

prior to 1993 and In most instances, are not consistent with the land use mapping principles of the 2011 General Plan Update.

iii. Draft Land Use Map — In the early phases of the planning process, a Draft Land Use Map was prepared through coordination with property owners and community planning and sponsor groups. The Draft Land Use Map recommended by the planning groups was analyzed as the Proposed Project for the Draft SEIR and circulated for public review. Comment letters received from circulating the Draft SEIR for public review are based on the Draft Land Use Map.

iv. Modified Project Alternative — This alternative is based on comment letters received during the Notice of Preparation public review period for the Draft SEIR. These letters considered the Draft Land Use Map and proposed reduced densities on specific parcels to further reduce the GPA's impacts. This alternative is discussed in SEIR Chapter 4.0, Project Alternatives (see Figures 4-1A through C).

v. Staff Recommendation — A staff working group identified areas where issues were raised during public review of the Draft Plan and Draft SEIR. These areas are referenced as Areas of Consideration (AOC). In formulating a staff recommendation for each AOC, the working group considered factors such as existing land use and parcel sizes, conformance with the Community Development Model, access to a public road, the extent of physical and environmental constraints, and proximity to environmentally sensitive CNF lands. Appendix 2 to Attachment B provides an analysis of each AOC, along with the rationale for the Staff Recommendation.

C. Staff Recommendation and Draft Land Use Map Differences

The Staff Recommendation and Draft Land Use Maps are the primary alternatives provided for consideration because the Draft Map is primarily based on community planning groups' (CPG) recommendations and the Staff Recommendation was developed after considering issues identified in the comment letters received from circulating the Notice of Preparation and Draft SEIR. The Staff Recommendation Land Use Map (Attachment B, Appendix 1) uses a blue hatch to identify areas where the Staff Recommendation differs from the Draft Land Use Map.

i. Land Use Designations

Table B-2 below summarizes the differences in assigning land use designations between the "Staff Recommendation" and "Draft Land Use Maps". The Staff Recommendation assigns 25.5 less acres of Rural Commercial and 2,826.4 less acres of Semi-Rural Regional Category designations than the Draft Land Use Map. Otherwise, the Staff Recommendation assigns 165 more acres of Village Regional Category and 1,444 more Rural Lands Regional Category than the Draft Land Use Map.

Table B-2: Staff Recommendation and Draft Land Use Map Differences
Assignment of Land Use Designations (Acres)

CPA or Subregion	Rural Commercial	Village Residential	Semi-rural Residential	Rural Lands	Public/Semi-Public Facilities	Public Agency Lands	Tribal Lands	Open Space (Conservation)
Alpine CPA	(25.5)	165.4	(2,484.5)	2,254.5			90.0	
Central Mountain (unrepresented)				(487.2)				487.2
Cuyamaca				(1.2)				1.2
Julian				(40.4)				40.4
Lake Morena			(134.4)	(100.9)		235.3		
Mountain Empire (unrepresented)				(230.7)		230.7		
Palomar Mountain			(207.5)	50.0	0.9	156.6		
Total	**(25.5)**	**165.4**	**(2,826.4)**	**1,444.1**	**0.9**	**622.6**	**90.0**	**528.8**

Note: Negative numbers are in parentheses ( ) and represent where the Staff Recommendation assigns less acres of a land use designation than the Draft Land Use Map

ii. Dwelling Unit Yield

The Staff Recommendation and Draft Land Use Map are the same for the communities of Descanso, Desert, Julian, Pine Valley, Ramona, and unrepresented communities of Mountain Empire and North Mountain. Differences between the Draft Land Use Map and Staff Recommendation occur in the unrepresented community of Central Mountain along with the communities of Alpine, Cuyamaca, DeLuz, Dulzura, Lake Morena, and Palomar Mountain.

At buildout the Staff Recommendation would also result in fewer potential dwelling units than the Draft Land Use Map for the communities identified below (the reduction in the number of units is shown in parentheses below):

- Alpine (937)
- Central Mountain-unrepresented (2)
- Cuyamaca (12)
- DeLuz (6)
- Dulzura (9)
- Lake Morena (7)
- Palomar Mountain (6)

iii. Areas of Consideration (AOC)

The Staff Recommendation land use map incorporates changes based on issues raised in the Draft SEIR public comment letters. Areas of Consideration are identified and analyzed in Appendix 2 to Attachment B. The analysis for each area of consideration includes a description of the property, context, physical and environmental constraints, and the rationale for staff's recommendation. The primary planning criteria for staff's recommendation is summarized below.

a) *Consistency with the Community Development Model*

- Expansion of Alpine Village is recommended in response to the Alpine CPG's desire for a larger population base to support a new high school. The Staff Recommendation proposes an extension of the existing linear pattern of the

Alpine Village. The GPA would extend this linear pattern by applying higher land use intensities along the existing transportation corridors of Interstate 8 and Alpine Boulevard [refer to AL-3, AL-5].

- In most communities, FCI lands are located well outside of villages. Rural Lands 40 or 80 land use designations are assigned in these areas consistent with the Community Development Model so that areas of very low density provide for a separation between communities [refer to AL-7, AL-8, CM-1, CU-1, DE-2, JD-1, NM-1, NM-2, PD-1].

b) *Consistency with existing parcel size* – Outside of villages and the County Water Authority boundary, Semi-Rural 10 or Rural Lands 20 land use designations are assigned only when the predominant parcel size is similar (10 to 20 acres) and would result in little to no additional subdivision potential [refer to AL-1, AL-9, AL-10, DE-1].

c) *Reduced development adjacent to CNF lands* – Lower land use designations are assigned adjacent to the CNF lands to reduce density in the Wildland/Urban Interface. Additional development in this area increases the likelihood of human-caused wildland fires, requires a greater commitment of resources to manage buffers between the CNF and developed areas, and increases the need for additional infrastructure and services in CNF lands [refer to AL-7, AL-8, AL-9, AL-10, AL-11B, CM-1, CU-1, DE-1, DE-2, JD-1, NM-1, NM-2, PD-1].

d) *Reduced development in areas with sensitive biological resources* – Lower density residential designations are assigned in areas with high value biological resources to avoid these sensitive resources [refer to AL-2A, AL-5, AL-7, AL-10, AL-11A, CU-1, LM-1, PD-1].

e) *Reduced development in areas without adequate access* – Lower densities are assigned in areas that are one-half mile or more from public roads [refer to AL-1, AL-5, AL-6, AL-7, AL-8, AL-9, CM-1, CU-1, JD-1, PD-1.]

f) *Reduced development in areas with physical constraints* – Lower densities are assigned in areas dominated with slopes greater than 25% [refer to AL-7, CM-1, CU-1, NM-1, PD-1].

g) *Avoid spot designations* – Avoid assigning a single commercial designation outside of villages and away from transportation nodes [refer to AL-2B].

C. ANALYSIS AND DISCUSSION

1. General Plan Consistency

This GPA will replace the pre-1993 land use designations for FCI lands with designations consistent with the General Plan Update adopted in 2011. Adoption of the proposed GPA provides the following benefits:

- Ensures that the entire land use map for the unincorporated county is consistent with the Community Development Model and other General Plan Guiding Principles, goals and policies
- Provides certainty to property owners of former FCI lands when filing project applications

This GPA proposes to replace the pre-FCI General Plan land use designations with those of the adopted General Plan. Table C-1 below identifies the General Plan policies that form the basis for the mapping principles that apply to assigning land use designations to the General Plan land use map. Policies LU-1.1 and LU-1.9 relate to the overall Staff Recommendation land use map, while Policies LU-1.2, LU-1.3, LU-1.4, and LU-1.5 primarily are related to a proposed new Village in the Alpine Community Planning Area. An analysis of GPA conformance with these policies is provided in the table below.

Table C-1: General Plan Conformance

General Plan Component	Explanation of GPA Conformance
1) **Policy LU-1.1 – Assigning Land Use Designations**. Assign land use designations on the Land Use Map in accordance with the Community Development Model and boundaries established by the Regional Categories Map.	The Community Development Model (CDM) forms the basis for assigning land use designations to the General Plan land use map. The CDM is based on a central core, such as a Village or Rural Village, surrounded by semi-rural areas that reflect the existing patterns of development. Consistent with the policy, the GPA assigns: • Rural Lands designations in remote lands adjacent to the CNF. • Semi-rural designations consistent with existing semi-rural parcel sizes. • Village designations consistent with existing parcels sizes, adjacent to existing village areas, or as an expansion of the existing linear Alpine Village along major transportation corridors.
2) **Policy LU-1.3 – Development Patterns**. Designate land use designations in patterns to create or enhance communities and preserve surrounding rural lands.	The GPA preserves rural lands by assigning only Rural Lands designations, with the exception of certain areas in the communities that are consistent with existing parcel sizes or to enhance existing village areas.
3) **Policy LU-1.9 – Achievement of Planned Densities**. Recognizing that the General Plan was created with the concept that subdivisions will be able to achieve densities shown on the Land Use Map, planned densities are intended to be achieved through the subdivision process except in cases where regulations or site specific characteristics render such densities infeasible.	This GPA is consistent with this policy because physical and environmental constraints to development are considered when assigning land use designations; along with other constraints such as inadequate road access. Therefore, the densities assigned by the Staff Recommendation Land Use Map are meant to be achievable.
4) **Policy M-2.1 – Level of Service Criteria**. Require development projects to provide associated road improvements necessary to achieve a level of service of "D" or higher on all Mobility Element roads except for those where a failing level of service has been accepted by the County pursuant to the criteria specifically identified in the accompanying text box (Criteria for Accepting a Road Classification with Level of Service E/F). When development is proposed on roads where a failing level of service has been accepted, require feasible mitigation in the form of road improvements or a fair share contribution to a road improvement program, consistent with the Mobility Element road network.	The GPA is consistent because either change a road segment classification change from two to four lanes is proposed or road segments are identified to accept at a LOS E or F based on the criteria provided in this policy.

2. Community Plan Consistency

Government Code 65359 dictates that community plans affected by a GPA shall be reviewed and amended as necessary to make the community plan consistent with the General Plan. Staff reviewed community and subregional plans for communities that are a part of this GPA and found that land use designations assigned to the Staff Recommendation are consistent with the applicable community and subregional plans. Because this GPA is proposing higher densities outside the County Water Authority boundary, changes to the Alpine Community Plan are proposed to ensure the Staff Recommendation land use map is consistent with the Community Plan. Proposed changes to make the Community Plan policies consistent with the land use map are discussed in the table below.

Table C-2: Community Plan Conformance

Alpine Community Plan Component	Explanation of GPA Conformance
1) Land Use/General Policy 2 – Direct higher density residential development to the existing urban services area; continue existing densities to the imported water service area; and encourage low densities beyond those limits.	This GPA revises this policy to direct higher density residential development to both existing and planned urban services areas. The policy revision is shown below. *Direct higher density residential development to the existing and planned urban services area; continue existing densities to the imported water service area; and encourage low densities beyond those limits.*
2) Land Use/Residential Policy 1.b – Higher density development in the existing sanitation district area is encouraged over that in areas requiring major extension of sewer lines.	This GPA revises the policy to encourage higher density mixed use development in the Willows Road area east of the Viejas casino to retain consistency between the land use map and community plan. The policy revision is shown below. *Higher density development in the existing sanitation district area is encouraged over that in areas requiring major extension of sewer lines, with the exception of the Willows Road area east of the Viejas casino where mixed use development is also encouraged.*

3. Zoning Ordinance Consistency

This GPA proposes Zoning use regulation, lot size, and building type changes when the current zoning is no longer consistent with proposed land use designations. Staff reviewed the proposed zoning for the GPA for consistency with the Staff Recommendation Land Use Map designations in accordance with the Compatibility Matrix in Zoning Ordinance Section 2050.

4. California Environmental Quality Act (CEQA) Compliance

A Supplemental Environmental Impact Report (SEIR) to the Program EIR for the General Plan Update certified on August 3, 2011, has been prepared pursuant to CEQA. The former FCI lands were not a part of the General Plan Update and, therefore, analysis of potential impacts from development of these lands could not be analyzed in the General Plan Update Program EIR. A Notice of Preparation (NOP) was issued August 30, 2012, soliciting input on the scope of the SEIR. Twelve comment letters were received and included as part of the Draft SEIR. The Draft Plan was analyzed as the Proposed Project. Other alternatives evaluated by the Draft SEIR are identified below.

- *No New East Willows Village Alternative (Alpine CPA)* – Reduced land use densities within the proposed new Alpine "village core" east of the Viejas Casino.

- *Modified Project Alternative (Environmentally Superior Alternative)* – Based on the recommendations in comment letters received during the NOP public review period that propose reduced densities on specific parcels to further reduce GPA impacts.
- *No Project Alternative* – Assumes pre-existing General Plan land use densities that currently apply to the former FCI lands would remain in effect.

The Draft SEIR determined that significant impacts will occur under the SEIR topic areas identified below. Generally, the environmental impacts of these changes can be addressed by mitigation measures. However, the SIER determined that the potential for disturbance from the proposed changes would represent an irreversible change. For all topic areas, either the Draft Land Use Map or Staff Recommendation would result in either similar or less impacts than the No Project Alternative, which would be to retain the current General Plan designations for FCI lands.

- Aesthetics
- Agricultural Resources
- Air Quality
- Biological Resources
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Mineral Resources
- Noise
- Public Services
- Transportation and Traffic
- Utilities and Service Systems

The Draft SEIR and the Draft Plan were circulated on February 1, 2013 for a 45-day review period. The Draft SEIR is included as Attachment D. Revisions to the Draft SEIR based on public comment letters are shown in strikeout-underline. Staff's responses to public comment letters are included as Volume 2 of Attachment D.

5. GPA Issues

A. General Plan Conformance of Project Applications — Since expiration at the end of 2010, land use designations are not consistent with the current General Plan, and for many properties, the densities allowed by the former General Plan are not consistent with the General Plan Guiding Principles and Policies. Project applications filed before the FCI GPA is adopted will be required to be processed based on the land use designations in effect at the time of application. The expeditious processing of this amendment will provide more clarity and certainty for property owners and future development applications.

B. Lack of Consensus — The Draft Land Use Map for this GPA is the Proposed Project for the Draft SEIR. The Draft Map is based on property owner and community planning and sponsor group recommendations. However, comment letters were received during public review of the Draft SEIR that expressed opposition to some land use designations proposed in the Draft Plan for the communities of Alpine, Lake Morena, Cuyamaca, Descanso, Dulzura, Palomar Mountain, and DeLuz.

When developing the Staff Recommendation Land Use Map, staff considered the recommendations of property owners, community planning and sponsor groups, and comment letters received from circulating the Draft SEIR and Land Use Map for public review. Of the over 4,000 parcels included with this GPA, the staff recommendation proposes to change the Draft Land Use Map designation for less than 12 percent of the parcels. That being said, the least consensus was reached in the community of Alpine, where, unlike the other communities, the recommendations for land use designations and density were divided within the community. The

primary areas where consensus in Alpine is lacking are described below. Appendix 2 to Attachment B discusses the rationale for staff's recommendations.

1. Willows Road parcels west of Viejas Casino — There are two parcels on Willows Road where the GPA proposes a Rural Commercial designation. Staff recommends a Semi-rural 4 designation because one parcel is nearly entirely constrained by wetlands [refer to AL-2A], and a Commercial designation would be a spot zone as the second parcel is surrounded by semi-rural residential designations [refer to AL-2B].

2. Privately-owned lands south of Interstate 8 — Both the Draft Plan and Staff Recommendation propose increased densities south of Interstate 8 in the vicinity of the Viejas Reservation. The densities proposed require extension of the County Water Authority boundary. Both the United States Forest Service (USFS) and Endangered Habitats League (EHL) oppose the higher densities. The primary differences between the two maps are that the Staff Recommendation proposes higher densities along Alpine Boulevard and lower densities adjacent to the CNF; whereas the Draft Map assigns semi-rural densities consistently throughout, including adjacent to the CNF [refer to AL-5, AL-6, AL-7].

3. Ewiiaapaayp-owned parcel south of Interstate 8 — The Ewiiaapaayp Tribal Government requests a Rural Commercial designation for a single parcel on the south side of Interstate 8 directly south of the Southern Indian Health Council located on Willows Road. However, both staff and the Alpine CPG recommend a residential designation, consistent with surrounding parcels. This parcel is currently the subject of a fee to trust transfer appealed by the County [refer to AL-4].

4. Privately-owned lands in the Japatul Valley area — The General Plan Update assigned Rural Lands 40 designations to parcels outside the County Water Authority boundary in accordance with the Community Development Model. The Staff Recommendation assigns Rural Lands 40 in the Japatul Valley area, with the exception of areas with smaller parcel sizes. In these instances higher densities are assigned consistent with the predominant parcel sizes. The property owners and Alpine CPG support even higher densities in this area [refer to AL-8, AL-11B].

Other communities where the Draft Land Use and Staff Recommendation Maps are different is discussed below.

5. Cuyamaca — At the request of some property owners, the Community Sponsor Group recommends RL-40 (Draft Plan) for areas in the northwestern portion of the planning area. The Staff Recommendation is Rural Lands 80 because the area is generally undeveloped and the USFS raised issues regarding wildland fire hazards [refer to CU-1].

6. Jamul/Dulzura — The CPG recommends Rural Lands 40 (Draft Plan) for an area in the northeastern portion of the planning area. The Staff Recommendation for Rural Lands 80 is based on the existing large parcel sizes that are surrounded by, and only accessible through, the CNF [refer to JD-1].

7. Lake Morena — EHL raised a concern over the Semi-rural 10 density of parcels to the south of the Lake Morena Village adjacent to the CNF. The Staff Recommendation reduces the density for five parcels from Semi-rural 10 to Rural Lands 20 so that the density is more consistent with the size of the parcels [refer to LM-1].

8. Palomar Mountain — EHL raised a concern over the semi-rural density for large parcels with additional subdivision potential. Staff Recommendation reduces the density for nine parcels

from Semi-rural 10 to Rural Lands 40 so that these parcels are more consistent with the density assigned to similar adjacent parcels [refer to NM-1 and NM-2].

9. Pendleton-DeLuz — USFS raised concerns over a Rural Lands 40 designation for parcels surrounded by federally-designated CNF Wilderness lands. The Staff Recommendation reduces the density for this area from one dwelling unit per 40 acres to one dwelling unit per 80 acres. Assigning a RL-80 designation reflects that the only access to most of these parcels is only available through CNF lands [refer to PD-1].

C. Expansion of County Water Authority (CWA) Boundary — Both the Draft Land Use and Staff Recommendation maps require the extension of the CWA boundary in Alpine, both north and south of Interstate 8. These areas are currently groundwater dependent and require a four- to five-acre minimum lot size. Extending imported water services requires both a per-acre cost to annex into the CWA and Padre Dam Municipal Water District (PDMWD), along with the costs to construct any necessary infrastructure. [A study prepared to extend imported water services along the Willows Road corridor is included as Appendix 3 to Attachment B.]

D. Requirement to Update the Transportation Impact Fee — The FCI Lands GPA proposes land use map and Mobility Element (ME) road network changes that will warrant a future update to the County's Transportation Impact Fee (TIF) Program (the County TIF Program is available at: http://www.sdcounty.ca.gov/dpw/land/tif.html). This update would result in new fee rates for future development for primarily the Alpine community and South TIF Region planning areas. The proposed land use changes in the other FCI communities are not significant enough to warrant an update to the Program by themselves, but land use changes would be addressed as part of the next TIF Update. The FCI GPA land use changes would also affect the North and East TIF regions, but the land use changes proposed by this GPA outside of the Alpine community are very minor and would only have a minimal effect on North and East TIF region fee rates. ME road network changes are only proposed within the Alpine community.

This GPA proposes road network and land uses changes identified below that would necessitate updating the TIF Program for the Alpine community and the South TIF Region.

- Road Network: Revise the ME network by reclassifying the eastern end of Willows Road in Alpine from a two-lane to a four-lane road.
- Land Use: Assign land use designations that change the number of potential dwelling units and commercial land uses in Alpine over what was analyzed for the 2012 TIF Update as follows:
    - Increase the number of residential dwelling units at buildout of the land use map by approximately 1,500 units
    - Increase by approximately 140 acres the amount of Rural Commercial land uses and by 150 acres the amount of Village Core Mixed Use land uses

While the changes proposed with the FCI GPA warrant an update to the TIF Program to reflect land use and mobility plans, it should be noted that there are several other private and County-initiated GPA's currently going through the planning review process. An update to the TIF Program will require additional funding and action by the County and a separate Board action. If approved, staff will further assess the FCI changes to the TIF program and propose an appropriate time for a program update.

D. PUBLIC INPUT

Changes to an adopted General Plan must follow the process specified in Government Code Section 65350, which includes evaluation and analysis, public and agency review, Planning Commission review, and Board of Supervisors approval. Staff conducted public outreach that included two separate notifications to all property owners in FCI lands, along with staff's attendance at planning and sponsor group meetings.

In addition to public outreach, PDS staff coordinated with other County departments, including the Departments of Public Works and General Services, the Sheriff Department, and the Fire Authority.

Below is a summary of outreach efforts.

1. **Special Study of FCI lands in Alpine** — On August 1, 2007, the Board of Supervisors directed staff to begin planning for Phase I of FCI lands in Alpine; approximately 67 acres of non-tribal owned lands north of Interstate 8 and east of the Viejas reservation that are easily accessible from Interstate 8. A stakeholder group was established to facilitate planning for this area. The group consisted of residents along Willows Road, both to the west and east of the Viejas Casino, and a resident south of Viejas and Interstate 8, along with three members of the Alpine CPG, and a representative from Viejas. From 2008 through 2010, preliminary land use plans were prepared and coordinated through the Alpine CPG. Approximately four meetings with the stakeholder group and two meetings with the Alpine CPG were held during this period.

2. **Property Owner Notification (Initial)** — Early in the planning process property owners of affected parcels were mailed a "notification of a proposed property change". The purpose of this notification was to inform property owners of the proposed GPA, recommend preliminary land use and zoning designations, identify when the GPA would be addressed at the applicable planning or sponsor group meeting, and to encourage property owners to sign up to receive the regular email notifications (discussed below) to keep abreast of the GPA status.

3. **Web Page** — At the initiation of the countywide GPA, a web page was established to provide the most current information on the GPA as it progressed through the planning phases: http://www.sdcounty.ca.gov/pds/advance/FCI.html.

4. **eBLAST** — Planning & Development Services publishes regular email notifications to provide specific information concerning this GPA, including when the various components of the public outreach program will occur. Property owners affected by this GPA and other interested parties have been encouraged to sign up to receive this email.

5. **Community Planning and Sponsor Group Input** — Staff attended a total of approximately 16 planning and sponsor group meetings for the Alpine, Campo/Lake Morena, Cuyamaca, Descanso, Jamul/Dulzura, Julian, Pine Valley, and Ramona communities, along with a meeting with Palomar Mountain Planning Organization. These meetings were well attended because notices had been mailed to all property owners informing them of the meeting time and date. These planning groups solicited input from property owners and provided staff with a recommended land use map. These recommended maps became the Draft Land Use Map, which was part of the Proposed Project for the Draft SEIR.

6. **Tribal Consultation** — All tribal governments within the San Diego region were notified about the changes proposed by this GPA in accordance with Government Code 65352. As a result of these notifications, consultations were conducted with the following: Ewiiaapaayp, Pechanga, Viejas, and the Inter-tribal Cultural Resource Protection Council. Correspondence received from Tribal governments is included as Attachment E.

7. **Public and Agency Review** — In accordance with CEQA, areas of potential controversy for the Proposed Project were identified through written agency and public comments received during the NOP public review period. As a result of these comments, meetings were held with the USFS, CNF Foundation, and EHL. The Draft Plan and Draft SEIR were circulated for a 45-day public review as discussed in Section C.6 above. Staff received 41 comment letters and issues raised in these letters were a major consideration when preparing the Staff Recommendation. The area of consideration analysis (Attachment B, Appendix 2) includes excerpts from these letters, when applicable.

8. **Property Owner Notification (Second)** — Once the Staff Recommendation was developed, a second notice was mailed to every property owner of affected parcels. The purpose of this notification was to inform property owners of the proposed Staff Recommendation land use designation and zoning and to inform them when this GPA would be heard by the Planning Commission.

E. RECOMMENDATIONS

In addition to the Staff Recommendation developed by the working group, there are several other alternatives available for the Planning Commission to consider, as described in Section B.2.B above. The Planning Commission can select one, or any combination of, these alternatives. Some alternatives are more consistent with General Plan objectives than others, as described in the table below.

Table E-1: Project Alternative for Planning Commission Consideration

Alternative	Consistent with General Plan objectives	Requires additional revision of General Plan goals & policies
Staff Recommendation	Yes	No
Draft Plan (SEIR Proposed Project)	Yes	Yes[1]
Modified Project	Yes	No
No Project (existing General Plan)	No[2]	Yes[3]
FCI Condition	Yes	No

Notes:

1) Policy LU-1.2, Leapfrog Development, would need to accommodate the Village Core Mixed Use designated area in East Alpine.
2) The existing General Plan designations for FCI lands are not consistent with the Community Development Model as they assign semi-rural densities in remote locations away from existing villages where the infrastructure, services and jobs are located.
3) Policies LU-1.1 and LU-1.3 would need to be revised because semi-rural densities are assigned in remote locations, as discussed in Note 1 above.

Staff recommends that the Planning Commission:

1. Find that it has reviewed and considered the information contained in the Final Program Environmental Impact Report, dated August 3, 2011, on file with Planning & Development Services (PDS) as Environmental Review Number 02-ZA-001, and the Draft Supplemental Environmental Impact Report thereto, dated August 2013, on file with PDS as GPA 12-004, prior to making its recommendation on the GPA.
2. Recommend that the Board of Supervisors adopt the Resolution (Attachment A) for Forest Conservation Initiative Lands General Plan Amendment (GPA-12-004).
3. Recommend that the Board of Supervisors adopt the attached Form of Ordinance:

   AN ORDINANCE CHANGING THE ZONING CLASSIFICATION OF CERTAIN PROPERTY WITHIN THE COUNTY OF SAN DIEGO RELATED TO THE FOREST CONSERVATION INITIATIVE LANDS GENERAL PLAN AMENDMENT [GPA 12-004] (Attachment C)

Report Prepared By:	*Report Approved By:*
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AUTHORIZED REPRESENTATIVE: _____
MARK WARDLAW, DIRECTOR

ATTACHMENTS:

Attachment A – Resolution of the San Diego County Board of Supervisors Adopting Forest Conservation Initiative Lands General Plan Amendment (GPA 12-004)
Attachment B – Staff Recommendation
Attachment C – Zoning Ordinance Amendment
Attachment D – Draft Supplemental Environmental Impact Report
Attachment E – Senate Bill 18 Correspondance

Attachment B
Staff Recommendation

October 2013

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VII.	Removal of Forest Conservation Initiative Appendix	19

Appendices

B-1: Staff Recommendation Land Use Maps

B-2: Areas of Consideration Analysis

B-3: Willows Road Study Area Water and Sewer Feasibility Study

I. Introduction

Staff initially prepared a Draft Plan for this project based, primarily, on recommendations from community planning and sponsor groups, when applicable. The Draft Plan included proposed changes to the General Plan land use map and community and subregional plans. A Supplemental Environmental Impact Report (SEIR) was prepared which analyzed the Draft Plan as the Proposed Project. In February to March 2013, the Draft Plan and SEIR were circulated for a 45-day public review period.

For the communities of Cuyamaca, Descanso, Pine Valley, Jamul/Dulzura, Julian, Lake Morena/Campo, Ramona, and most of Alpine, the changes proposed in the Draft Land reflect the recommendations of the applicable community planning or sponsor group. For two parcels in Alpine, the Alpine Community Planning Group (CPG) changed its recommendation to a higher density subsequent to the preparation of the SEIR.

While the Palomar Mountain Planning Organization did not make a formal recommendation for the Draft Plan for Palomar Mountain, the group implicitly supports and the Draft Plan has not raised any concerns with the changes proposed to the land use designations for that area on the Draft Land Use Map. Finally, there is no planning or sponsor group for Pendleton-DeLuz or the unrepresented portions of Central Mountain, Desert, Mountain Empire, or North Mountain.

The Draft Plan did not address the Mobility Element; however, a Traffic Study was prepared as part of the Draft SEIR. This study identified road segments that, with buildout of the Draft Land Use Map, would either need to be reclassified to a wider designation with additional travel lanes or the County would need to accept them to operate at a Level of Service (LOS) E or F.

II. Land Use Map Revisions

This section describes the staff recommendation for the GPA land use map and identifies how it differs from the Draft Plan analyzed in the SEIR as the Proposed Project. Appendix 1 to this Attachment B includes community level land use maps as recommended by staff. The parcels included with this project are outlined with a heavy red line. Areas shown with the blue hatch represent parcels where the staff recommended land use designation differs from the Draft Plan.

As part of the public review for the Draft Plan, staff received public comment letters that raised concerns with the land use map. Staff reviewed the concerns expressed in these comment letters and prepared an analysis for each area identified. Table 1, Land Use Map Areas of Consideration, provides a summary of each area of concern, along with a comparison of the designations proposed on the Draft Plan with Staff Recommendation. The Staff Recommendation land use map is the same as the Draft Plan in the communities of Descanso, Julian, Pine Valley, Ramona and portions of the Desert, Mountain Empire, and North Mountain Subregions not represented by a planning or sponsor group.

A more detailed analysis for each area of consideration is provided in Appendix 2. The analysis provides a comparison the potential dwelling unit yield between the Draft Land Use Map and Staff Recommendation. The analysis for each area of consideration includes a description of the property, context, physical and environmental constraints, and the rationale for staff's recommendation.

Table 1: Land Use Map Areas of Consideration

ID #	Acreage	# Parcels	SEIR	Recommendation[1]		Maximum Dwelling Units[1]		
				CPG[2]	Staff	SEIR	CPG[2]	Staff
Alpine [AL]								
1	286	22	SR-1	SR-10/Tribal[NOTE 2]		238	20	
2								
A	4	1	RC		SR-4	comm.		SR-4
B	5	1	RC	SR-4[NOTE 2]		comm.	SR-4	
3	249	48	Village Core Mixed Use (VCMU) / RC			1505[NOTE 3]	808[NOTE 4]	
4	16	1	RC	VR-2[NOTE 2]		comm.	32	
5	696	86	SR-1, SR-2 SR-4	VR-2, SR-1 SR-2, SR-4[NOTE 2]	VR-2, SR-1 SR-4, SR-10	401	607	495
6	427	161	RC, SR-4	RC, VR-2, SR-1 SR-2, SR-4[NOTE 2]	RC, VR-2, SR-1 SR-4, SR-10	146	248	141
7	360	6	SR-10	SR-10, RL-40[NOTE 2]	RL-40	21	12	9
8	1,748	23	RL-20		RL-40	81		41
9	1,458	209	SR-10	RL-20[NOTE 2]		222	211	
10	247	17	SR-10	RL-20[NOTE 2]		19	17	
11								
A	76	1	SR-2	RL-40[NOTE 2]		35	1	
B	124	4	SR-2		RL-40	47		4
Cuyamaca [CU]								
1	2,634	94	RL-40		RL-40/RL-80	94		82
Descanso [DE]								
1	321	10	RL-40			12		
2	384	42	SR-10			45		
3	171	17	SR-10			16		
Central Mountain [CM]								
1	120	1	RL-40	N/A	RL-80	3	N/A	1
Jamul / Dulzura [JD]								
1	730	4	RL-40		RL-80	18		9
Mountain Empire [Lake Morena-LM]								
1	134	5	SR-10		RL-20	13		7
North Mountain [NM]								
1	120	7	SR-10		RL-40	10		7
2	441	37	SR-10		SR-10/RL-40	40		38
3	22	1	SPA	N/A	SPA	0	N/A	0
Pendleton-DeLuz [PD]								
1	1,003	18	RL-40	N/A	RL-80	24	N/A	18

Notes:

1 Staff and Community Planning Group (CPG) recommendations are the same for cells spanning two columns

2 Recommendation from Alpine CPG meeting of September 19, 2013

3 SEIR Traffic Study assumed a density of 20 dwelling units per acre

4 Staff Recommendation assumes a density of 10.9 dwelling units per acre for VCMU designated area

III. Land Use Element Revisions

This project proposes revisions to two sections of the General Plan Land Use Element: the Land Use Designations and Regional Categories Map.

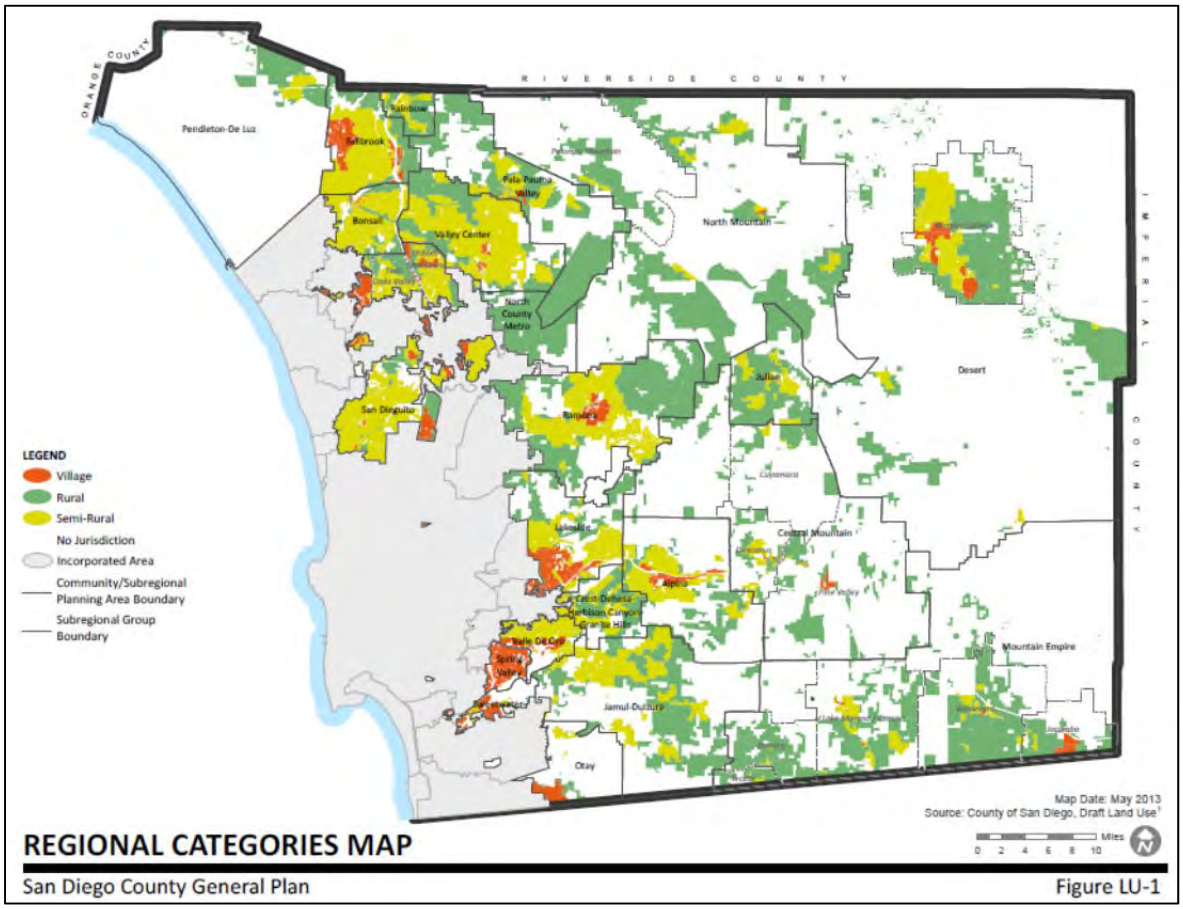
Land Use Designations

The *Other Land Use Designations* section of the Land Use Element includes Forest Conservation Initiative Lands as a land use designation. This project would remove this designation and associated text from the General Plan. The text proposed to be removed from page 3-18 of the Land Use Element is shown in ~~strikeout~~ below.

> ~~Forest Conservation Initiative Lands. This designation applies to lands affected by the Forest Conservation Initiative (FCI) of 1993. This initiative mandated specific land use designations, goals, and policies (provided in the Forest Conservation Initiative Appendix), which are in effect through December 31, 2010. Upon expiration of the FCI, the General Plan must be amended to remap the lands in conformance with this General Plan.~~

Regional Categories Map

The land use map changes proposed by this GPA require revisions to Figure LU-1, Regional Categories Map, shown on page 3-19 of the Land Use Element. The proposed changes would remove the Forest Conservation Initiative overlay on the map and replace those areas with the regional categories for the new land use designations in the Staff Recommendation. Figure LU-1 as revised is shown below.



IV. Mobility Element Revisions

A Traffic Impact Assessment Analysis was prepared as part of the SEIR (see http://www.sdcounty.ca.gov/pds/advance/GPA-12-004-Appn-D-Traffic-Study.pdf). This assessment uses as a baseline the traffic analysis prepared for the General Plan Update that was adopted in August 2011. The SEIR Traffic Assessment identified eight road segments in Alpine that are forecast to change from a level of service (LOS) D or better to LOS E or F with buildout of the Draft Plan (proposed project in the SEIR). These road segments are listed below.

- Alpine Boulevard from Tavern Road to Boulders Road
- Alpine Boulevard from Louise Drive to Viejas View Place
- Alpine Boulevard from West Willows Road to East Willows Road
- South Grade Road from Eltinge Drive to Olive View Road
- West Willows Road from Alpine Boulevard to Otto Avenue
- Willows Road (West) from Otto Avenue to Viejas Casino Road
- Viejas Casino Road from Willows Road (West) to Willows Road (East)
- Willows Road (East) from Viejas Casino Road to I-8 On-Ramp

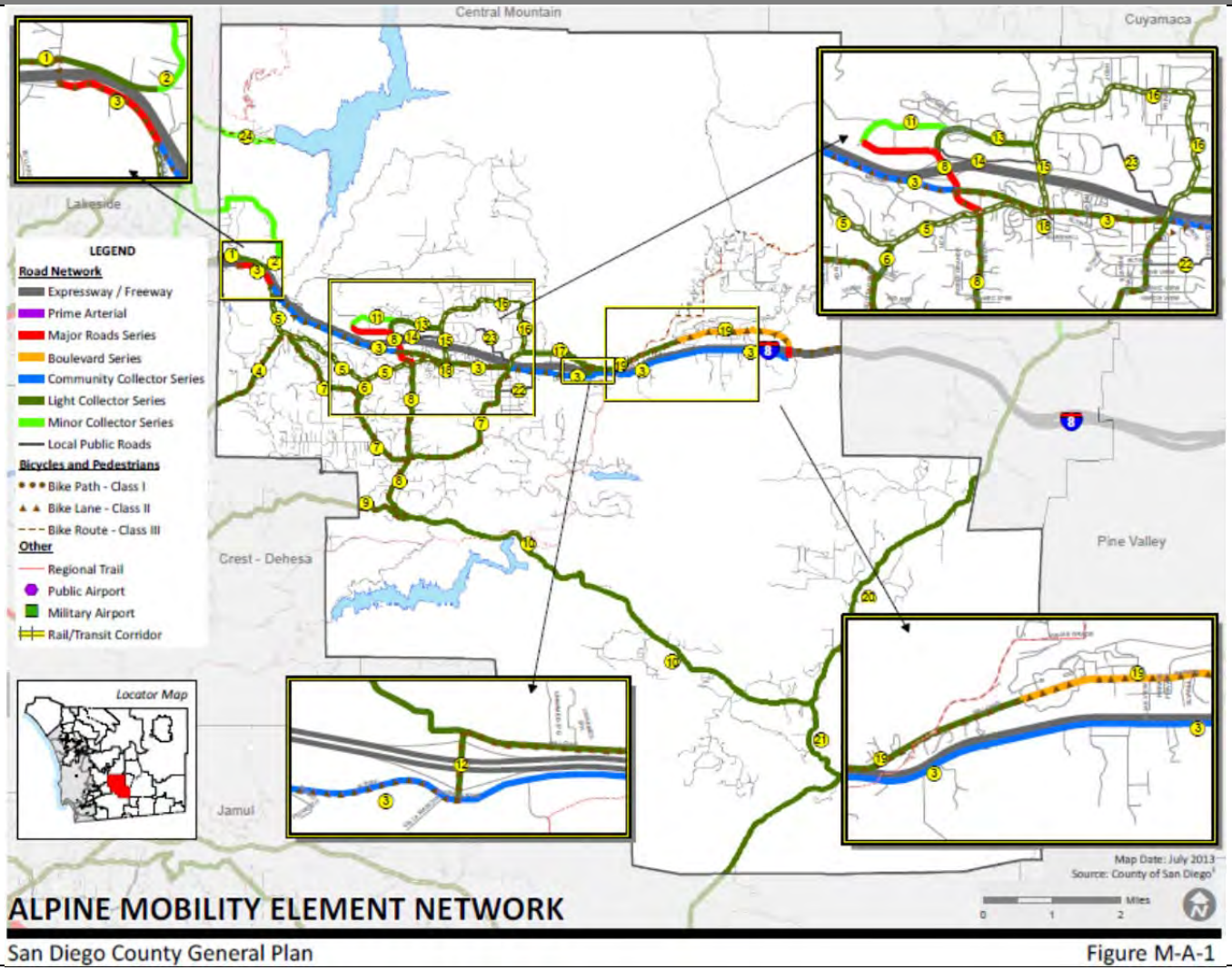
The land use changes proposed by the Staff Recommendation will reduce land use intensities north and south of Interstate 8 in Alpine when compared to the Draft Plan. These changes would reduce the forecast traffic volumes at buildout of the land use map on Willows Road and on Alpine Boulevard east of West Willows Road; however, these road segments would still operate at LOS E or F.

With the exception of Willows Road east of Viejas Casino Road, on April 4, 2013 the Alpine CPG recommended to accept a lower LOS on all other road segments identified above, rather than increase the number of travel lanes. As a result, the Staff Recommendation proposes to modify Mobility Element Table M-4, Road Segments Where Adding Travel Lanes is Not Justified, to include those road segments.

The CPG recommended changing the classification of Willows Road from Viejas Casino Road east to the Interstate 8 westbound on-ramp at Willows Road to a 4.2B Boulevard with Intermittent Turn Lanes. The staff recommendation is consistent with the CPG recommendation.

The proposed changes to the Mobility Element are shown on the following pages. Changes to the Mobility Element network map and matrix are shown first, then changes to Table M-4, Road Segments Where Adding Travel Lanes is Not Justified, are shown identifying new road segments where the addition of travel lanes is not justified.

Alpine Community Planning Area



Proposed Change: Revise the designation for a portion of Willows Road from 2.2E Light Collector to 4.2A Boulevard with Raised Median

Mobility Element Network—Alpine Community Planning Area Matrix			
ID	**Road Segment**	**Designation/Improvement** #.#X = [# of lanes].[roadway classification][improvement]	**Special Circumstances**
8	Tavern Road (SA 380) Segment: ~~Tavern Lane~~ New Road 11 to Japatul Road	4.1A Major Road Continuous Turn Lane – New Road 11 ~~Raised Median~~ ~~Tavern Lane~~ to ~~Alpine Boulevard~~ Arnold Way 2.2D Light Collector Improvement Options [Raised Median]—Arnold Way to South Grade Road 2.2E Light Collector South Grade Road to Japatul Road	None Caltrans Facilities Programming Improvements (widening) of the Interstate 8 overpass are not programmed in the 2030 RTP (Reasonably Expected Revenue scenario)
~~12~~	~~Tavern Lane~~ ~~Segment: New Road 11 to Tavern Road~~	~~4.1A Major Road~~ ~~Median [Continuous Left Turn Lane]~~	~~None~~*Note: This road segment is considered part of Tavern Road. As such, a separate ID is not necessary. See Tavern Road for designations and improvements.*
12	West Willows Road[1] Segment: Willows Road to Alpine Boulevard	2.2E Light Collector	None
19	Willows Road (SC 2000) Segment: Otto Avenue to Alpine Boulevard	2.2E Light Collector Otto Avenue/West Willows Road to Viejas Casino Road 4.2B Boulevard Intermittent Turn Lanes—Viejas Casino Road east to I-8 westbound on-ramp (Exit 36) ~~2.2E Light Collector~~ ~~Viejas Casino area to I-8 westbound on-ramp at East Willows Road~~ 4.1A Major Road Raised Median—I-8 westbound on-ramp at ~~East~~ Willows Road to Alpine Boulevard	Accepted at LOS F Segment: Alpine Boulevard to Viejas Grade Road
24	El Monte Road (SC 1920) Segment: Lakeside community boundary to El Capitan Reservoir	2.3C Minor Collector	None

4 - 600

Table M-4 Road Segments Where Adding Travel Lanes is Not Justified			
Road	**Classification**	**From**	**To**
State Highways[a]			
SR 67	4.1B Major Road with Intermittent Turn Lanes	Poway city limits	Scripps Poway Pkwy. (Lakeside)
	4.1A Major Road with Raised Median	Scripps Poway Pkwy. (Lakeside)	Sycamore Park Dr. (Lakeside)
	4.1A Major Road with Raised Median	Johnson Lake Rd. (Lakeside)	Posthill Rd. (Lakeside)
	4.1B Major Road with Intermittent Turn Lanes	11th Street (Ramona)	Pine Street/SR-78 (Ramona)
SR-76/Pala Rd.[b]	4.1A: 4-Ln Major Road w/ Raised Median	Old Hwy 395 (Fallbrook)	I-15 SB Ramps (Fallbrook)
	2.1D Community Collector w/ Improvement Options	Pala Del Norte Rd. (Pala Pauma)	Sixth St (Pala Pauma)
Main Street/SR-78	4.2B: 4-Ln Boulevard w/ Intermittent Turn Lanes	9th St (Ramona)	Pine St (Ramona)
County Mobility Element Roads			
Alpine Blvd.	2.2A Light Collector w/ Raised Median	Tavern ~~Boulder~~ Rd. (Alpine)	South Grade Rd.~~Louise Dr.~~ (Alpine)
	2.1D Community Collector w/ Improvement Options	South Grade Rd. (Alpine)	West Willows Rd. (Alpine)
	2.1C Community Collector w/ Intermittent Turn Lanes	West Willows Rd. (Alpine)	Willows Rd.(East) (Alpine)
Bancroft Dr.	2.2D Light Collector w/ Improvement Options	Troy St (Spring Valley)	SR-94 EB Ramps (Spring Valley)
Briarwood Rd.	2.1D Community Collector w/ Improvement Options	SR-54 WB Ramps (Sweetwater)	Robinwood Rd (Sweetwater)
Campo Rd.	4.2B Boulevard w/ Intermittent Turn Lanes	Kenwood Dr (Valle de Oro)	Conrad Dr (Valle de Oro)
Central Ave.	2.2B Light Collector w/ Continuous Turn Lane	Sweetwater Rd. (Sweetwater)	Bonita Rd. (Sweetwater)
	2.2C Light Collector w/ Intermittent Turn Lanes	Bonita Rd. (Sweetwater)	Frisbee St. (Sweetwater)
De Luz Rd.	2.2C Light Collector w/ Intermittent Turn Lanes	Dougherty St. (Fallbrook)	W. Mission Rd. (Fallbrook)
Deer Springs Rd.	4.1B Major Road w/ Intermittent Turn Lanes	I-15 NB Ramps (NC Metro)	N Centre City Pkwy (NC Metro)
Del Dios Hwy.	2.1D Community Collector w/ Improvement Options	El Camino Del Norte (San Dieguito)	Via Rancho Pkwy (North County Metro)
E. Mission Rd.	4.2B Boulevard w/ Intermittent Turn Lanes	Live Oak Park Rd. (Fallbrook)	I-15 SB Ramps (Fallbrook)
El Apajo	2.1A Community Collector w/ Raised Median	Villa De La Valle (San Dieguito)	Via De Santa Fe (San Dieguito)

Table M-4 Road Segments Where Adding Travel Lanes is Not Justified			
Road	**Classification**	**From**	**To**
El Camino del Norte	2.2F Light Collector w/ Reduced Shoulder	Aliso Canyon Rd. (San Dieguito)	Del Dios Hwy./Paseo Delicias (San Dieguito)
Fuerte Dr.	2.2E Light Collector	Bancroft Dr. (Valle de Oro)	Avacado Blvd. (Valle de Oro)
Jamacha Rd.	6.2 Prime Arterial	Campo Rd/SR-94 (Valle de Oro)	Fury Ln. (Valle de Oro)
	4.1B Major Road w/ Intermittent Turn Lanes	SR-125 SB Ramps (Spring Valley)	Sweetwater Rd (Spring Valley)
La Bajada/ La Granada	2.2F Light Collector w/ Reduced Shoulder	Rancho Santa Fe Rd. (San Dieguito)	Paseo Delicias (San Dieguito)
Lake Jennings Park Rd.	4.1B Major Road w/ Intermittent Turn Lanes	I-8 Business Route (Lakeside)	I-8 WB Off-Ramp (Lakeside)
Lilac Rd.	4.2B Boulevard w/ Intermittent Turn Lanes	New Road 19 (Valley Center)	Valley Center Rd. (Valley Center)
Linea del Cielo	2.2F Light Collector w/ Reduced Shoulder	El Camino Real (San Dieguito)	Rambla de las Flores (San Dieguito)
Los Coches Rd.	2.1D Community Collector w/ Improvement Options	Woodside Ave (Lakeside)	I-8 Business Route (Lakeside)
Lyons Valley Rd.	2.2B Light Collector w/ Continuous Turn Lane	Campo Rd. (Jamul)	Skyline Truck Trail (Jamul)
Maine Ave.	2.2E Light Collector	Mapleview St (Lakeside)	Woodside Ave (Lakeside)
Mapleview St.	4.1A Major Road w/ Raised Median	Maine Ave. (Lakeside)	Ashwood St (Lakeside)
Mountain Meadow Rd./ Mirar de Valle	2.1D Community Collector w/ Improvement Options	North Broadway (NC Metro)	New Road 19 (Valley Center)
New Road 19	4.2B Boulevard w/ Intermittent Turn Lanes	Mirar de Valle Road (Valley Center)	Lilac Road (Valley Center)
Old Hwy 395	2.1D Community Collector w/ Improvement Options	5th St. (Rainbow)	Interstate 15 NB ramp (Fallbrook)
Old Hwy 395	2.1A Community Collector w/ Raised Median	Interstate 15 SB ramp (Fallbrook)	Stewart Canyon Dr. (Fallbrook)
	2.1D Community Collector w/ Improvement Options	Pala Rd. (Fallbrook)	Dublin (W) Rd. (Fallbrook)
Paradise Valley Rd.	4.1B Major Road w/ Intermittent Turn Lanes	Elkelton Blvd (Spring Valley)	Sweetwater Rd (Spring Valley)
Paseo Delicias	2.2A Light Collector w/ Raised Median	Via De La Valle (San Dieguito)	El Camino Del Norte (San Dieguito)
Pomerado Rd.	4.1A Major Road w/ Raised Median	I-15 NB Ramps (County Islands)	Willow Creek Rd. (County Islands)
Rainbow Valley Blvd. West	2.2D Light Collector	I-15 NB Ramps (Rainbow)	Old Hwy. 395 (Rainbow)
Rancho Santa Fe Road	2.2F Light Collector w/ Reduced Shoulder	Encinitas city limits	La Bajada (San Dieguito)

Table M-4 Road Segments Where Adding Travel Lanes is Not Justified			
Road	**Classification**	**From**	**To**
San Dieguito Rd.	2.1A Community Collector w/ Raised Median	El Apajo Rd. (San Dieguito)	San Diego city limits
7th St.	2.2E Light Collector	Elm St. (Ramona)	A St. (Ramona)
		Main St. (Ramona)	D St. (Ramona)
South Grade Rd.	2.2C Light Collector w/ Intermittent Turn Lanes	Eltinge Drive (Alpine)	Olive View Road (Alpine)
Valley Center Rd.	4.2A Boulevard w/ Raised Median	Miller Rd (Valley Center)	Indian Creek Rd (Valley Center)
Via de la Valle	2.1B Community Collector w/ Continuous Turn Lane	San Diego city limits (San Dieguito)	Las Planideras (San Dieguito)
	2.1E Community Collector	Las Planideras (San Dieguito)	Paseo Delicias (San Dieguito)
West Willows Rd.	2.2E Light Collector	Alpine Blvd (Alpine)	~~Viejas Grade Rd.~~ Otto Ave. (Alpine)
Wildcat Canyon Rd.	2.1D Community Collector w/ Improvement Options	Willow Rd. (Lakeside)	Barona Casino (Ramona)
Willows Road (West)	2.2E Light Collector	Otto Ave. (Alpine)	Viejas Casino Rd. (Alpine)
Willows Road (East)	4.2B Boulevard w/ Intermittent Turn Lanes	Viejas Casino Rd. (Alpine)	Alpine Blvd. (Alpine)
Woods Valley Rd.	2.2C Light Collector w/ Intermittent Turn Lanes	Oakmont Rd (Valley Center)	Karibu Ln. (Valley Center)
Woodside Ave.	4.2A Boulevard w/ Raised Median	SR-67 NB Off Ramp (Lakeside)	Riverford Rd. (Lakeside)

a. The cross-sections for State Highway reflect the design in the Project Authorization/Environmental Document (PA/ED), which are different from those of the County Mobility Element road classifications.
b. Roads noted are on the Congestion Management Program (CMP). Acceptable LOS for roads on the CMP is LOS E or better.

V. Community and Subregional Plan Revisions

North Mountain Subregional Plan

This GPA would add a section at the end of Chapter 2, Land Use, concerning multi-use communications structures, to partially compensate for the removal of the Telecommunication Site Overlay Designation under the General Plan Update in August 2011. In addition, the project includes proposed amendments to the Zoning Ordinance to add a Communications Facilities overlay (see Section VI Zoning Revisions).

MULTI-USE COMMUNICATIONS FACILITIES OVERLAY

An overlay, shown on Figure 1, identifies Palomar Mountain Multi-use Communications Facilities Overlay. The purpose of this overlay is to specify areas that have been determined to be acceptable locations for the operation of communications facilities and to promote co-location of communications facilities within those areas. Communications facilities include antennas and/or microwave dishes that send and/or receive radio frequency signals. These facilities may include structures, towers or accessory buildings. This overlay does not pertain to cell towers; however, antennas and equipment for cellular communications would be appropriate for co-location on communications facilities allowed by the overlay.

This overlay does not provide exemptions from any of the requirements of the County's Wireless Telecommunications Facilities Ordinance. State and local government emergency services and essential services are exempt from co-locating their communications facilities with commercial communication facilities and from siting their communication facilities within the overlay area as required for public safety. The objective of this overlay is to promote the effective, efficient and coordinated activities of the broadcasting and communications industry and to encourage the sharing of such areas by multiple operators.

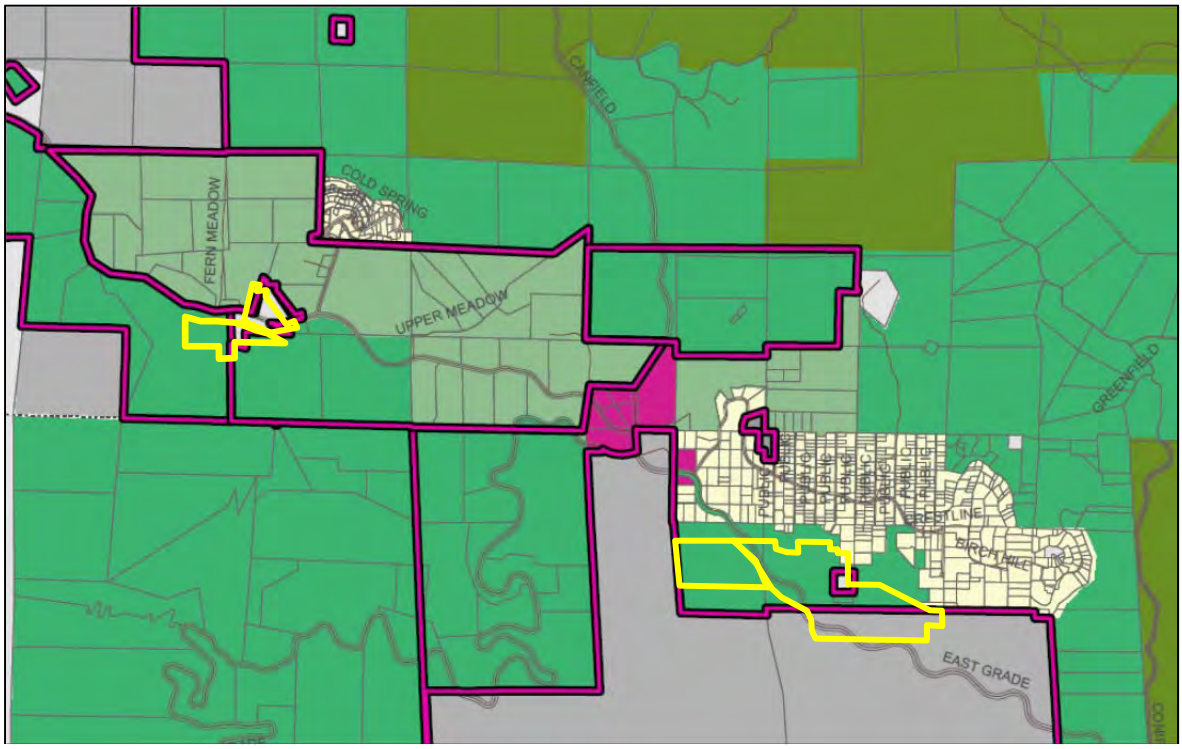
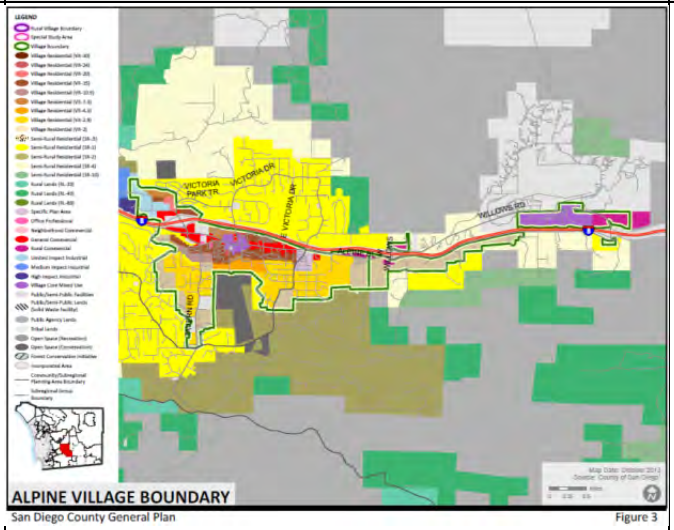


Figure 1: Acceptable sites (outlined in yellow) for communications facilities on Palomar Mountain.

Alpine Community Plan

The proposed Community Plan revisions reflect proposed land use map changes that would assign land use designations that extend the Alpine Village to the eastern end of Willows Road along with an expansion to the existing village boundary. In addition, the proposed Community Plan changes recognize that an expansion of the water and sewer service areas is required to serve the land use intensities proposed for the eastern areas of the planning area.

Alpine Community Plan			
Page	**Section**	**Revision**	**Rationale for Change**
5	2 Community Character Findings	*Revise the last paragraph on the page as follows*: The community character of Alpine will be best maintained by a gradual decrease in density from the ~~Country Town~~ village and a centralized industrial and commercial area. It is the intent of the community to keep residential and agricultural areas of Alpine free from industrial and major commercial encroachments.	Revised to reflect the expansion of the Village at East Willows Road based on the Draft Plan endorsed by the Alpine Community Planning Group.
6	2 Community Character Findings	*Revise the first paragraph on the page as follows*: Within the ~~Rural~~ Village boundary (Refer to Figure 3 on page 9), the design guidelines contained in the Alpine Design Manual will ensure that development is consistent with Alpine's village character.	Same as above.
6	2 Community Character Findings	*Add the following paragraph at the end of the Findings section*: Expansions of imported water and sanitary sewer services are necessary to accommodate the increased land use intensities identified on the Alpine General Plan land use map. More specifically, both imported water and sewer services are necessary to fully realize the land use intensities allowed by the Village land use designated areas along Willows Road east of Viejas and residential densities south of Alpine Boulevard between the Interstate 8 interchanges at West Willows Road and at the eastern end on Willows Road.	Added to identify where expansions to imported water and sanitary sewer services are necessary based on increased densities proposed by the Draft Land Use Map endorsed by the Alpine Community Planning Group.

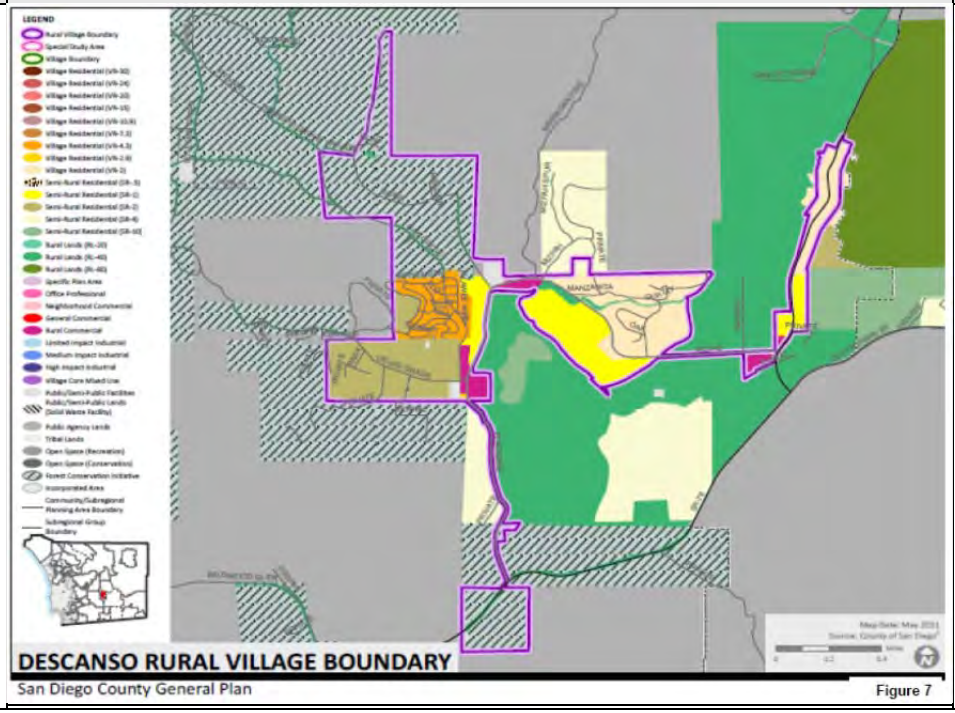
Alpine Community Plan			
Page	**Section**	**Revision**	**Rationale for Change**
9	1 Community Character Figure 3 Alpine Village Boundary		Figure revised to show an expanded village area
11	2 Land Use General Findings	*Revise the second paragraph under Findings as follows*: The pattern for community development presented in the Alpine Community Plan accommodates growth in and surrounding the existing town; designating the agricultural areas and the remote, more mountainous areas for low density rural uses. Residential development ranging from single-family houses on half acre or less lots to multi-family units is contained within the Village boundary. Major commercial development is generally restricted to properties along Alpine Boulevard, Arnold Way, Willows Road, and to the Tavern Road-Interstate 8 Interchange area.	Added to reflect the draft land use map recommended by the Alpine Community Planning Group.
11	2 Land Use General	*Revise Policy 2 as follows*: Direct higher density residential development to the existing and planned urban services area; continue existing densities to the imported water service area; and encourage low densities beyond those limits.	Added to reflect the draft land use map recommended by the Alpine Community Planning Group, which assigns land use intensities requiring urban services to the north and south of Interstate 8 east of the Alpine Village.

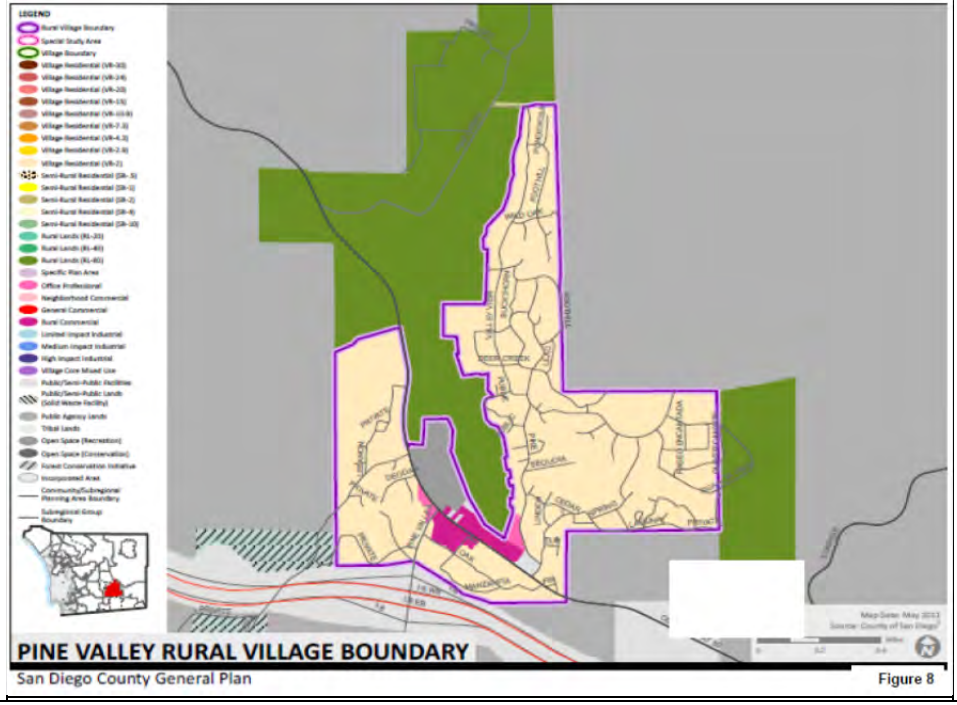
Alpine Community Plan			
Page	**Section**	**Revision**	**Rationale for Change**
12	2 Land Use Residential	*Revise Policy 2 as follows*: Higher density development in the existing sanitation district area is encouraged over that in areas requiring major extension of sewer lines, with the exception of the Willows Road area east of the Viejas casino where mixed use development is also encouraged.	Added to reflect the draft land use map recommended by the Alpine Community Planning Group, which would assign a Village Core Mixed Use designation east of the Viejas Casino complex.
27	7 Public Facilities and Services Water - Findings	Most of the central area of Alpine is serviced by Padre Dam Municipal Water District. There is sufficient water to serve the existing population. The General Plan land use map assigns densities that cannot be fully developed without expanding the Water District east to the expanded Alpine Village boundary.	Added to reflect that the draft land use map recommended by the Alpine Community Planning Group, which will require an expansion of the water services area in Alpine.
28	7 Public Facilities and Services Sewer - Findings	*Revise the last paragraph as follows*: Major annexations and extensions of service areas have been granted over the past several years by the Alpine Sanitation District and LAFCO. The General Plan land use map assigns densities that cannot be fully developed without further expansion of the Sanitation District to the east along Interstate 8.	Added to reflect that the draft land use map recommended by the Alpine Community Planning Group, which will require and expansion of the sewer services area in Alpine.
12	2 Land Use Residential	*Revise Policy 2 as follows*: Higher density development in the existing sanitation district area is encouraged over that in areas requiring major extension of sewer lines, with the exception of the Willows Road area east of the Viejas casino where mixed use development is also encouraged.	Added to reflect the draft land use map recommended by the Alpine Community Planning Group, which would assign a Village Core Mixed Use designation east of the Viejas Casino complex.
27	7 Public Facilities and Services Water - Findings	Most of the central area of Alpine is serviced by Padre Dam Municipal Water District. There is sufficient water to serve the existing population. The General Plan land use map assigns densities that cannot be fully developed without the expansion of the Water District east to the East Willows interchange both north and south of Interstate 8.	Added to reflect that the draft land use map recommended by the Alpine Community Planning Group, which will require an expansion of the water services area in Alpine.

Alpine Community Plan			
Page	**Section**	**Revision**	**Rationale for Change**
28	7 Public Facilities and Services Sewer - Findings	*Revise the last paragraph as follows*: Major annexations and extensions of service areas have been granted over the past several years by the Alpine Sanitation District and LAFCO. The General Plan land use map assigns densities that cannot be fully developed without further expansion of the Sanitation District along Willows Road east of the Viejas Casino complex on the north side of Interstate 8.	Added to reflect that the draft land use map recommended by the Alpine Community Planning Group, which will require and expansion of the sewer services area in Alpine.

Central Mountain Subregional Plan

The proposed Subregional Plan revisions remove a reference to the now expired Forest Conservation Initiative and revise the allocation of land use designations in Descanso to reflect the draft land use map recommended by the Descanso Community Planning Group on March 26, 2012.

Central Mountain Subregional Plan			
Page	**Section**	**Revision**	**Rationale for Change**
57	Figure 7 Descanso Rural Village Boundary		This figure is being replaced with one that shows land use designations for the former FCI lands, rather than the green hatch currently shown on the figure in the Subregional Plan.

Central Mountain Subregional Plan			
Page	**Section**	**Revision**	**Rationale for Change**
57	Figure 8 Pine Valley Rural Village Boundary		Same as rationale for Figure 7 above.

Central Mountain Subregional Plan			
Page	**Section**	**Revision**	**Rationale for Change**
62	Land Use Designation by Ownership and Plan Designation Descanso Subregional Group Area	PLAN DESIGNATION / OWNERSHIP / PERCENTAGES VILLAGE RESIDENTIAL 2 PRIVATE ~~1~~0.5% ~~VILLAGE RESIDENTIAL 2.9 PRIVATE 1%~~ VILLAGE RESIDENTIAL 4.3 PRIVATE ~~1~~0.2% SEMI-RURAL RESIDENTIAL 1 PRIVATE ~~1~~0.4% SEMI-RURAL RESIDENTIAL 2 PRIVATE ~~1~~0.5% SEMI-RURAL RESIDENTIAL 4 PRIVATE ~~1~~2.2% SEMI-RURAL RESIDENTIAL 10 PRIVATE ~~1~~8.6% RURAL COMMERCIAL PRIVATE 0.1% ~~OPEN SPACE (CONSERVATION) PUBLIC/PRIVATE 2%~~ RURAL LANDS 40~~*~~ PRIVATE ~~27~~18.4% RURAL LANDS 80 PRIVATE ~~4~~3.9% PUBLIC/SEMI-PUBLIC PUBLIC 2.4% ~~FEDERAL AND STATE LANDS 58%~~ PUBLIC AGENCY LANDS PUBLIC 60.6% NO PLAN INDIAN RESERVATION 2.2% TOTAL ACRES 20,941~~38~~ ~~* Includes Lands within the Forest Conservation Initiative~~	Revised allocation of land use designations to reflect the draft land use map recommended by the Descanso Community Planning Group.

Jamul/Dulzura Subregional Plan

The proposed Subregional Plan revisions remove a portion of a policy and text that reference the now expired Forest Conservation Initiative.

Jamul/Dulzura Subregional Plan			
Page	**Section**	**Revision**	**Rationale for Change**
9	Chapter 2 Land Use Rural Residential Policy 4	*Delete the entire paragraph after subparagraph (f) as follows:* ~~Clustering of residential development, however, is prohibited on FCI affected lands as stipulated in the Forest Conservation Initiative Overlay Land Use Designation in the County General Plan Land Use Element.~~	Deleted the reference to the Forest Conservation Initiative.
9	Chapter 2 Land Use Rural Residential Policy 5	*Delete Policy 5 as follows:* Residential development outside the County Water Authority boundary should be limited to densities consistent with the County Groundwater Ordinance. The clustering of dwelling units is acceptable in areas that use groundwater, as long as they meet the provisions of the County Groundwater Ordinance. ~~Clustering of residential development, however, is prohibited on FCI affected lands as stipulated in the Forest Conservation Initiative Overlay Land Use Designation in the County General Plan Land Use Element~~	Deleted the reference to the Forest Conservation Initiative.

VI. Zoning Revisions

Consistency with Land Use Map Changes

This project includes minor changes to Zoning Ordinance use regulations and development regulations, including density, lot size, building type, setback and special area regulations on specific properties. Most properties formerly subject to the FCI require no changes to zoning as part of this project. However, in the areas with land use designation changes, the project includes changes in zoning to correspond with the changes in the General Plan land use designation, for example from residential to commercial in the General Plan.

The proposed changes in zoning use regulations comply with the Compatibility Matrix, Section 2050 of Zoning Ordinance by making the zoning consistent with the land use designations. In the cases where density and lot size are affected, zoning is being changed to match the General Plan land use designation, allowing for potential development that would be expected under the General Plan. For example, where densities are increasing, a corresponding reduction in lot size is proposed. In the cases where building type and setbacks are affected, zoning is changed to the typical similar zone that would be found in the same areas with similar use regulations. For example, building types and setbacks found in other commercial zones in the same area would be matched to allow for similar commercial development. Compatible zoning changes must be adopted with General Plan land use designation changes to assure proper implementation of the General Plan in the project area.

VII. Removal of Forest Conservation Initiative Appendix

The text of the Forest Conservation Initiative is currently included as an appendix to the County General Plan. Since the Initiative has expired and the purpose of this project is to redesignate lands that were subject to the Initiative, this appendix is proposed to be removed from the General Plan. The text that is proposed to be removed is shown in ~~strikeout~~ below.

~~FOREST CONSERVATION INITIATIVE~~

~~The People of San Diego County Do Hereby Ordain as Follows:~~

~~Section One—Findings And Purpose~~

~~A. Tremendous development pressures in San Diego County are resulting in the rapid fragmentation and destruction of the Cleveland National Forest. Approximately 55,000 acres of land within the Cleveland National Forest are privately owned and, under existing plans, will inevitably be developed. Sustaining and protecting the wildlife resources of the Cleveland National Forest is highly dependent upon limiting urban encroachment on these private lands. Yet, as with the case of the recent adoption of the Central Mountain Subregional Plan update, extensive development has continued on these biologically sensitive land holdings. This initiative measure creates new policies to limit the conversion of privately owned lands within the Cleveland National Forest to urban uses.~~

~~B. The Cleveland National Forest is one of the largest expanses of undisturbed, natural open space in Southern California and as such is valuable as a watershed, agricultural area, and~~

~~recreational area for the citizens of San Diego County. The area is also home to a number of threatened or endangered animal and plant species including, but not limited to, Mountain Lion, Bald Eagle, Golden Eagle, Least Bell's Vireo, Orange-Throated Whiptail, Yellow Warbler, Coast Horned Lizard, Englemann Oak, Tecate Cypress, Parish's Meadowfoam, and San Diego Thornmint. Parish's Meadowfoam and San Diego Thornmint are listed as endangered by the California Department of Fish and Game. The Golden Eagle and the Least Bell's Vireo are on the Federal lists of sensitive and endangered species, respectively.~~

~~C. The unique resources of the Cleveland National Forest are of such significance that development on parcels within the Forest must be restricted. The San Diego County Planning Commission indicated that a parcel size of greater than 20 acres was necessary to preserve those pristine areas, and to minimize the impact of development on public lands. The U.S. Fish and Wildlife Service, the California Department of Parks and Recreation, and numerous wildlife biologists have determined that an 80 acre minimum parcel size is required to protect the resources of the Cleveland National Forest. This initiative amends the San Diego County General Plan to impose a minimum parcel size of 40 acres on all privately owned lands within the boundaries of the Cleveland National Forest and outside Country Towns, through December 31, 2010. The initiative also amends the San Diego County General Plan to provide that all such privately owned lands within the boundaries of the Cleveland National Forest and outside Country Towns, through December 31, 2010. The initiative also amends the San Diego County General Plan to provide that all such privately owned lands fall within the "Environmentally Constrained Area" regional category; except for the amendment relating to such private land holdings, the General Plan provisions governing the "Environmentally Constrained Area" regional category remain unchanged by the initiative through December 31, 2010.~~

~~D. Recognizing the need for continued growth and adequate housing in the County, this initiative measure's primary restrictions apply only to the private land-holdings located within the boundaries of the Cleveland National Forest as delineated on the San Diego County General Plan Land Use Map. This initiative measure this does not apply to land located within County Towns. County Towns are historically established retail/residential areas serving surrounding low density rural areas. Attached to this initiative are (1) a map of the Cleveland National Forest illustrating the boundaries of the Cleveland National Forest, and (2) Community and Subregional Plan maps showing the locations of Country Towns. There is abundant land within unincorporated San Diego County, within Country Towns and outside the boundaries of the Cleveland National Forest, available to meet the expected housing needs identified by the San Diego County General Plan Housing Element. This initiative measure will allow the County to continue to bear its fair share of regional growth, and to provide an adequate range of housing for all sectors of the community, while assuring the protection of the Cleveland National Forest.~~

~~E. The Land Use Element of the San Diego County General Plan adopted January 3, 1979, as amended through April 20, 1992 sets forth several goals essential to protecting the County's~~

~~environmental resources which this initiative reaffirms and readopts to remain in effect through December 31, 2010; these goals are:~~

~~Goal 1.1: Urban Growth be directed to areas within or adjacent to existing urban areas, and that the rural setting and lifestyle of the remaining areas of the County be retained.~~

~~Goal 2.6: Insure preservation of contiguous regionally significant open space corridors.~~

~~Goal 3.1: Protect lands needed for preservation of natural and cultural resources; managed production of resources; and recreational, educational, and scientific activities.~~

~~F. The Open Space Element adopted December 20, 1973, as amended through April 20, 1992 sets forth several goals essential to protecting the County's environmental resources which this initiative reaffirms and readopts to remain in effect through December 31, 2010; these goals are:~~

~~Goal 2: Conserve scarce natural resources and lands needed for vital natural processes and the managed production of resources.~~

~~Goal 3: Conserve open spaces needed for recreation, educational and scientific activities.~~

~~Goal 4: Encourage and preserve those open space uses that distinguish and separate communities.~~

~~Goal II-4: Encourage the conservation of vegetation and trees needed to prevent erosion, siltation, flood, and drought, and to protect air and water quality.~~

~~Goal II-5: Encourage the conservation of the habitats of rare or unique plants and wildlife.~~

~~Goal II-8: Encourage the preservation of significant natural features of the County, including the beaches, lagoons, shoreline, canyons, bluffs, mountain peaks, and major rock outcroppings.~~

~~G. The Conservation Element adopted December 10, 1975, as amended through April 20, 1992 sets forth several policies essential to protecting the County's environmental resources which this initiative reaffirms and adopts to remain in effect through December 31, 2010; these policies are:~~

~~Policy 2: San Diego County shall coordinate with appropriate federal, state and local agencies to conserve areas of rare, endangered, or threatened species.~~

~~Policy 7: The County shall establish procedures for acquiring significant wildlife habitats in areas of rapid urban development and areas of projected urban development.~~

~~Section Two – General Plan Amendment~~

~~The San Diego County General Plan, including its Community and Subregional Plans, as amended through April 20, 1992 (hereinafter the "San Diego County General Plan") is hereby amended as follows, through December 31, 2010:~~

A. The following resource protection goals and policies (set forth in their entirely in findings E, F, and G of section One of the Forest Conservation Initiative) are hereby reaffirmed and readopted: goals 1.1, 2.6, and 3.1 of the San Diego County General Plan Land Use Element; goals 2, 3, 4, II-4, II-5, and II-8 of the San Diego County General Plan Open Space Element; and, policies 2 and 7 of the San Diego County General Plan Conservation Element.

B. The National Forest and State Parks (23) land use designation as set forth beginning on page II-25 of the San Diego County General Plan Land Use Element is hereby amended through December 31, 2010 as follows:

1. The existing first sentence of this designation is deleted and the following sentence is added commencing a new subsection (a):

   "(a) The National Forest and State Parks (23) designation indicates the planned boundaries and major land holdings of the Cuyamaca Rancho State Park and Anza-Borrego State Park."

2. The following is added as new subsection (b) on page II-26 following the provisions of subsection (a) regarding clustering:

   "(b) The National Forest and State Parks (23) designation also applies to all private landholdings lying within the boundaries of the Cleveland National Forest and outside of Country Towns. For purposes of this subsection, "private land-holdings" means lands held in fee title by any person or entity other than the federal, state, county or local government. A map of the Cleveland National Forest is attached to the Forest Conservation Initiative and incorporated herein for purposes of showing the outer boundaries of the Cleveland National Forest. For all parcels identified above, a forty (40) acre-minimum parcel size and a maximum residential building intensity of one dwelling unit per parcel shall apply. The provisions described in subsection (a) above concerning lot sizes and clustering on lands within Cuyamaca Rancho State Park and Anza-Borrego State Park shall not apply to private land-holdings within the Cleveland National Forest.

   "Except as provided hereinafter, until December 31, 2010, private land-holdings inside the boundaries of the Cleveland National Forest and outside Country Towns which are designated National Forest and State Parks (23) in the San Diego County General Plan shall remain so designated unless the County redesignates said land pursuant to the procedures set forth below in paragraphs (1) or (2) of this subsection.

   "(1) Private land-holdings inside the boundaries of the Cleveland National Forest and outside Country Towns which are designated National Forest and State Parks (23) may be removed from this designation if all of the follow findings (a-f) are made:

      "(a) That the approval will not constitute part of, or encourage, a piece-meal conversion of a larger Cleveland National Forest area to residential or other non-open space uses;

~~"(b) Adequate public services and facilities are available and have the capability to accommodate the proposed use by virtue of the property being within or annexed to appropriate service districts;~~

~~"(c) The land proposed for redesignation is contiguous to a Country Town;~~

~~"(d) The proposed use and density are compatible with the environmental resources of the Cleveland National Forest and will not adversely affect the stability of land use patterns in the area;~~

~~"(e) Incorporation or annexation to a city is not appropriate or possible within the next five years, based on the following factors: nearby cities' designated sphere of influence boundaries, city general plan limits and projections, and comprehensive annexation plans; and,~~

~~"(f) The land proposed for redesignation does not exceed 40 acres for any one landowner in any calendar year. One landowner may not redesignate lands designated National Forest and State Parks (23) more often than once every year. Landowners with any unity of interest are considered one landowner for purposes of this limitation.~~

~~"(2) Lands designated National Forest and State Parks (23) may be removed from this designation if the County, after challenge by an affected landowner, and after considering all facts and applicable legislative and judicial authority in support of this designation finds that denial of a redesignation would constitute, an unconstitutional taking of the landowner's property or would deprive the landowner of a vested right. In permitting a redesignation pursuant to this paragraph, the redesignation will be granted only after public notice and hearing and only to the minimum extend necessary to avoid said unconstitutional taking or deprivation of vested right.~~

~~"The General Plan maps listed below are amended by the Forest Conservation Initiative to provide that all private land holdings are defined in this subsection lying within the boundaries of the Cleveland National Forest and outside of Country Towns are designated National Forest and State Parks (23). To the extent that the maps listed below depict such private land holdings as subject to a designation other than National Forest and State Parks (23), those portions of the maps are repeated. Reduced copies of the maps, including text thereon indicating these amendments, are attached to the Forest Conservation Initiative. The maps as amended are incorporated into the San Diego County General Plan.~~

~~1. Alpine Community Plan dated July 2, 1990;~~

~~2. Ramona Community Planning Area dated January 9, 1989;~~

~~3. Julian Community Plan dated September 29, 1989;~~

~~4. Desert Subregional Area dated September 28, 1987;~~

~~5. Mountain Empire Subregional Area dated September 28, 1987;~~

~~6. North Mountain Subregional Area dated September 29, 1989;~~

~~7. Central Mountain Subregional Area dated October 6, 1988;~~

~~8. Pendleton-De Luz Subregional Area dated February 7, 1986; and,~~

9. Jamul-Dulzura Subregional Area dated February 13, 1992.

"The County may amend these maps as necessary to reflect:

- Redesignations of land pursuant to subsection (b), paragraphs (1) or (2), of designation (23);
- General Plan amendments relating to land other than private land-holdings lying within the Cleveland National Forest and outside Country Towns;
- The terms and purpose of the Forest Conservation Initiative."

C. The Environmentally Constrained Area (1.6) regional category as set forth on page II-11 of the San Diego County General Plan Land Use Element is hereby deleted and replaced with the following to remain in effect through December 31, 2010:

"Environmentally Constrained Areas include floodplains, lagoons, areas with construction quality sand deposits, rock quarries, agricultural preserves, area containing rare and endangered plant and animal species, and all private land-holdings as defined in subsection (b) of designation (23) as amended by the Forest Conservation Initiative within the Cleveland National Forest outside Country Towns. Development in these areas, while guided by the County General Plan, should be preceded by through environmental review and implementation of appropriate measures to mitigate adverse impacts.

"Uses and densities will be those permitted by the applicable community and subregional plan map; the County Zoning Ordinance; the Groundwater Policy; and, for private landholdings in the Cleveland National Forest and outside of Country Towns designated National Forest and State Parks (23) a forty acre minimum parcel size shall apply and a one (1) unit per parcel maximum density.

"The resource responsible for the designation of an ECA shall be identified and appropriate mitigation measures included in any project approval.

"Flood prone areas which are not planned for stabilization will be retained in natural, open and other non-urban uses.

"Areas designated Agricultural Preserve shall be designated 'Environmentally Constrained Areas'.

"The General Plan Regional Land Use Element Map dated August 26, 1991, as amended through April 20, 1992, is amended by the Forest Conservation Initiative to provide that all private land-holdings as defined in subsection (b) of designation (23) lying within the boundaries of the Cleveland National Forest and outside of Country Towns are included within the Environmentally Constrained Area regional category. To the extent that said map depicts such private landholdings as within a regional category other than Environmentally Constrained Area, those portions of the map are repealed. A reduced copy of the map, including text thereon indicating this amendment, is attached to the Forest Conservation Initiative. The map as amended is incorporated into the San Diego County General Plan.

"The County may amend this map as necessary to reflect:

- Redesignations of land pursuant to subsection (b), paragraphs (1) or (2), of designation (23);
- General Plan amendments relating to land other than private land holdings lying within the Cleveland National Forest and outside Country Towns;
- The terms and purpose of the Forest Conservation Initiative."

D. The Special Purpose Designations and Use Regulations Table on page II-24 of the San Diego County General Plan Land Use Element is hereby amended to add a notation to follow the use regulations listed for the National Forest and State Parks (23) designation through December 31, 2010 as follows:

"On private land holdings as defined in subsection (b) of designation (23) as amended by the Forest Conservation Initiative within the Cleveland National Forest, and outside Country Towns, the maximum residential density is one unit per 40 acres."

Section Three—Implementation

Upon the effective date of this initiative, the provisions of Section Two of this initiative amending the General Plan are inserted into the San Diego County General Plan, except that if in the year the initiative becomes effective, the four amendments permitted by State law for that year have already been utilized, this General Plan amendment shall be the first inserted into the San Diego County General Plan on January 1 of the following year.

Section Four—Exemptions For Certain Projects

This initiative shall not apply to any development project which has obtained as of the effective date of the initiative a vested right. The provisions of this initiative shall not apply to the extent that they would violate federal or state laws.

Section Five—Severability

If any portion of this initiative is declared invalid by a court, the remaining portions are to be considered valid.

Section Six—Duration

This initiative shall remain in effect until December 31, 2010.

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Appendix B-1:
Staff Recommendation Land Use Maps

Alpine

Central Mountain (unrepresented)

Cuyamaca

Descanso

Desert

Jamul/Dulzura

Julian

Lake Morena

Mountain Empire (unpresented)

North Mountain/Palomar Mountain

Pendle/DeLuz

Pine Valley

Ramona

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Appendix B-2:
Areas of Consideration Analysis

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Appendix B-3:
Willows Road Study Area Water and Sewer Feasibility Study