

**Attachment E – Correspondence
and Additional Information**

General Plan/Zoning Policies: Internal Consistency

General Plan Policy LU-2.2

LU-2.2 Relationship of Community Plans to the General Plan. Community Plans are part of the General Plan. These plans focus on a particular region or community within the overall General Plan area. They are meant to refine the policies of the General Plan as they apply to a smaller geographic region and provide a forum for resolving local conflicts. As legally required by State law, Community Plans must be internally consistent with General Plan goals and policies of which they are a part. They cannot undermine the policies of the General Plan. Community Plans are subject to adoption, review and amendment by the Board of Supervisors in the same manner as the General Plan.

Zoning Ordinance section 1003

1003 CONSISTENCY OF ZONING ORDINANCE WITH THE SAN DIEGO COUNTY
GENERAL PLAN.

In the event that the Zoning Ordinance becomes inconsistent with the San Diego County General Plan by reason of the adoption of a new Plan, or by amendment of the existing Plan or any of its elements, the Zoning Ordinance shall be amended within a reasonable time so that it is consistent with the newly adopted Plan or remain consistent with the existing Plan as amended. Additionally, all Zoning Ordinance amendments other than those previously described shall be consistent with the San Diego County General Plan. The procedure for the amendment of the Zoning Ordinance is contained in Sections 7500 through 7549, inclusive.

2013 General Plan Clean-Up
Community Planning/Sponsor Group Recommendations Received

Alpine

FINAL MINUTES

County of San Diego - Alpine Community Planning Group
Regular Meeting Minutes
Thursday, May 23, 2013, 6:00 P.M.
 Alpine Community Center
 1830 Alpine Boulevard, Alpine, California 91901

A. Call to Order

Jim Easterling read a statement regarding accusations and conduct of ACPG members.
 (See attachment A)

B. Roll Call of Members

Jim Archer	P	Travis Lyon	T	Lou Russo	P
George Barnett	E	Nicole McDonough	P	Richard Saldano	T
Aaron Dabbs	P	Mike Milligan	P	Sharmin Self	P
Jim Easterling	P	Tom Myers	E	Kippy Thomas	E
Roger Garay	P	Leslie Perricone	P	John Whalen	P
P=Present		E=Excused		A = Absent	
		T=Tardy			

5. The County of San Diego is requesting comments regarding the Draft 2013 General Plan Clean-Up General Plan Amendment (GPA 12-007). The 2013 Clean-Up is the first to be processed since the adoption of the updated General Plan. The Draft Clean-Up Plan proposes changes to the land use map, policy documents, Mobility Element network, and certain community and sub regional plans. Also, for convenience, four very low complexity General Plan property specific requests are being processed concurrently as GPA 12-012. The Clean-Up process is only meant to be used for minor changes or additions to the General Plan that do not result in additional significant environmental impacts. The Draft 2013 General Plan Clean-Up GPA is available at:

<http://www.sdcounty.ca.gov/pds/advance/2013GPBiAnnualClnUp.html>. Public comments are due by the close of business Monday, May 20th, 2013.

Presentation, Discussion and Action.

Travis Lyon stated that at the last meeting we voted to reaffirm our position on the land use elements on the clean up. The only other portion is the mobility element. They had to clean up to three road sections. Nicole spoke to Kevin Johnston at the county, because he's in charge of the clean up. The page by page recommendation the ACPG sent to Bob Citrano has not been received by Kevin. Kevin assured Nicole that he would try and get what we recommended from Bob, not sure if that has happened yet. Travis, stated that the differences in the clean up look to be the specification in naming of the road sections, there are no real differences.

Motion – Jim Archer
 2nd by Mike Milligan

Motion: Approve the clean up as presented.

Discussion: None

Vote: Unanimously approved by all members present.

MINUTES

Alpine Community Planning Group

P.O. Box 1419
Alpine, CA 91901-1419

NOTICE OF REGULAR MEETING

Thursday, April 25th, 2013 @ 6:00 P.M., Alpine Community Center, 1830 Alpine Boulevard, Alpine, CA 91901

- A. Call to Order @ 6:00 pm
- B. Roll Call of Members

Jim Archer	P	Travis Lyon	P	Lou Russo	P
George Barnett	P	Nicole McDonough	P	Richard Saldano	E
Aaron Dabbs	P	Mike Milligan	P	Sharmin Self	P
Jim Easterling	P	Tom Myers	P	Kippy Thomas	A
Roger Garay	T	Leslie Perricone	P	John Whalen	P
P = Present		E=Excused T=Tardy		A = Absent	

E. Organized / Special Presentations:

1. The County of San Diego is requesting comments regarding the Draft 2013 General Plan Clean-Up General Plan Amendment (GPA 12-007). The 2013 Clean-Up is the first to be processed since the adoption of the updated General Plan. The Draft Clean-Up Plan proposes changes to the land use map, policy documents, Mobility Element network, and certain community and sub regional plans. Also, for convenience, four very low complexity General Plan property specific requests are being processed concurrently as GPA 12-012. The Clean-Up process is only meant to be used for minor changes or additions to the General Plan that do not result in additional significant environmental impacts. The Draft 2013 General Plan Clean-Up GPA is available at:

<http://www.sdcountry.ca.gov/pds/advance/2013GPBiAnnualClnUp.html>. Public comments are due by the close of business Monday, May 20th, 2013.

Presentation, Discussion and Action.

Travis Lyon spoke regarding this matter. No representative from the county was able to be present. Kevin Johnston with the County of San Diego is the person handling this clean up, but had a prior engagement and could not make the meeting. He asked that the ACPG conduct the meeting and gather comments and make a recommendation to the county. Public comment: Sharon Haven spoke on behalf of Mr. Lyle Morton. His property is currently zoned limited impact industrial and he is requesting that it be changed to rural commercial. This is a land use designation change.

Jim Archer	Y	Travis Lyon	Y	Lou Russo	Y
George Barnett	Y	Nicole McDonough	Y	Richard Saldano	E
Aaron Dabbs	Y	Mike Milligan	Y	Sharmin Self	Y
Jim Easterling	Y	Tom Myers	Y	Kippy Thomas	A
Roger Garay	Y	Leslie Perricone	Y	John Whalen	Y
Y=Yes	N=No	E=Excused A=Absent		Ab = Abstain	

Motion: John Whalen. Confirm the ACPG prior recommendation of these two parcels as we presented them prior.

2nd: Mike Milligan

Motion Passes

Minutes

County of San Diego - Alpine Community Planning Group

P.O. Box 819
Alpine, CA 91903-0819
www.AlpineCPG.org

Meeting Minutes

Thursday, March 22, 2012, 6:02 P.M.

Alpine Community Center
1830 Alpine Boulevard, Alpine, CA 91901

- 6. Sharmin Self, Planning Group Subcommittee Chair for Major Public Policy and Utilites, and the property owner, presented a possible reclassification of APN 402-201-28-00 (located at the intersection of Dunbar Lane and Chocolate Summit Dr) from Limited Industrial to Rural Commercial.

Jim Archer motions to change the zoning, second by George Barnett.

Motion passes with 11 yes votes, and 4 absent

Bonsall

COUNTY OF SAN DIEGO BONSALL COMMUNITY SPONSOR GROUP

REGULAR MEETING MINUTES

Tuesday, June 4, 2013

7:00 P.M.

31505 Old River Road

Bonsall, California

1. ADMINISTRATIVE ITEMS:

A. **Roll:**

PRESENT: Morgan, Zales, Rosier, Davis, Carullo-Miller, Lintner

ABSENT: Norris

- B. General Plan Clean Up – (GPA-12-007) The following are items that the Bonsall Sponsor Group does not agree with staff.

Chapter 3 Land Use Element – 3-11 Table LU-1 Footnote d. All of the boundary that would include commercial or Village Regional Categories are next to the San Luis Rey River and in the FEMA Flood Plain and doubtful if underground parking would be allowed.

Chapter 10: Acronyms and Glossary - 10-32 Glossary new term - The revision does not make any sense as written the following is approved by the Bonsall Sponsor Group.
An Urban limit line is intended to be the basis for containment of growth inducing urban infrastructure or for community specific goals and policies.
Motion by Zales second by Davis and unanimously approved.

Staff notes:

- The proposed update to Table LU-1 (providing additional floor area ratio allowance as incentive for underground parking in the Village Core Mixed Use designation) would not require underground parking within this designation; it would just provide additional incentive, when underground parking is feasible.
- The Urban Limit Line clarification has been moved from a proposed Glossary definition (in the Draft Plan), to a proposed clarification statement (in the Staff Recommendation) for the policy that references it - Policy LU-14.4

Borrego Springs

County of San Diego

**BORREGO SPRINGS COMMUNITY SPONSOR GROUP
REGULAR MEETING MINUTES**

Thursday, June 6, 2013

Borrego Springs High School Cafeteria

2281 Diegueño Road, Borrego Springs, CA 92004

Administrative Items

- A. Call to Order: R. Caldwell called the meeting to order at 4:35PM
- B. Roll Call: Present - Beltran, R. Caldwell, Dr. S. Caldwell, Falk, King, Webb
Absent – Haldeman
- A. *Borrego Springs Community Plan – revisions to Policies LU 3.5.1, LU 3.9.1, and N 2.2.1 proposed by Department of Planning Services and Office of County Counsel – possible action on recommendations from Community Plan Development Committee in connection with same:* King motioned to oppose the proposed changes to the existing language of the Borrego Springs Community Plan, specifically the revisions to Policies LU 3.5.1, LU 3.9.1, and N 2.2.1 (see agenda for specific language). The sponsor group will add three statements of it's own in a position letter: 1. ordinances should conform to the community plan; 2. the revised wording is not sufficient to accomplish what the community intends; 3. the community was told when the draft was written that the community plan could be more stringent. Webb seconded. The motion passed (4 in favor, R. Caldwell opposed, Falk abstained).

June 10, 2013

Dear Mr. Johnston:

I am writing to report our group's position on the proposed changes to the Borrego Springs Community Plan [CP] offered by PDS as part of the current effort to "clean-up" the General Plan for San Diego County. On Thursday, June 6, 2012, at our regular monthly meeting the members of our group voted 4 in favor, 1 opposed, 1 abstaining for a motion to oppose the proposed changes in their entirety.

Here are some of the key points made by members in support of their opposition to the proposed changes:

- “Reality, in the form of county ordinances, regulations, and procedures should be conformed to the approved CP; the CP should not be ‘dumbed down’ to conform to current reality. Conforming the CP to existing conditions defeats the entire purpose of having an approved plan, and makes a mockery of the process. These and other recent changes to the CP imposed against the will of our community [e.g., the Wind Ordinance] don’t improve the CP, they degrade it.”
- “We object to this ‘watering down’ of the CP; it is not what the community intended. The revised wording is not adequate to accomplish what we want. The proposed language creates unenforceable loopholes. We went through the process, did the hard work of creating the CP, got this approved, and we want what was approved.”
- “When we were preparing the draft CP in 2008, we were repeatedly told by county staff that it could be ‘more stringent’ than the General Plan – that it should represent the specific needs of our community going forward, and be a template for our future.”

If you have any questions, please contact me. Our group is not scheduled to meet again until September 5, 2013.

Sincerely,



Rich Caldwell, Chair
Rich@BorregoValleyInn.com,
(760) 767-3319
Johnston_K_130610.doc

cc: Supervisor Bill Horn
Members, Borrego Springs Community Sponsor Group

Crest-Dehesa

From: wrplanning@aol.com
Sent: Monday, May 13, 2013 11:37 AM
To: Johnston, Kevin
Subject: Community Plan Cleanup Crest-Dehesa

Hi Kevin,

I am sorry, I thought I replied to the information that was sent to the Crest-Dehesa regarding the plan clean-up changes.

The Planning Group held a discussion under the Announcements category of an earlier agenda, and by consensus, agreed that the changes proposed to the Crest-Dehesa-Granite Hills-Harbison Canyon Plan area were so minor that no action was necessary.

I apologize for the inconvenience that was caused.

Wally Riggs, Chairman
Crest- Dehesa Planning Group

Fallbrook**FALLBROOK COMMUNITY PLANNING GROUP****And****DESIGN REVIEW BOARD**

Regular Meeting

Monday 17 June 2013, 7:00 P.M., Live Oak School, 1978 Reche Road, Fallbrook

MINUTES

Mr. Jim Russell called the meeting to order at 7:00 p.m.

Fourteen (14) members were present: Anne Burdick, Ike Perez, Roy Moosa, Tom Harrington, Michele Bain, Jean Dooley, Ron Miller, Jim Russell, Jack Wood, Lee J. De Meo, Eileen Delaney, Jerry Farrell, Jackie Heyneman and Donna Gebhart. Paul Schaden was not present.

3. Draft Plan for the GP Clean-up – http://www.sdcounty.ca.gov/pds/advance/2013_GP_Clean-up/March_2013_DraftPlan_GPCInUp.pdf. On pages 1-1 and 1-2 (p. 7 and 8 in the pdf page counter), there is an introduction that explains the General Plan Clean-up process. There are a couple proposed Fallbrook segment clarifications for the Mobility Element Network, along with adding the number label on the map that was missing, for Ammunition Road. You'll find these on pages 4-11 and 4-12 (p. 79 and 80 in the pdf page counter). On p. 4-11, keep in mind the only proposed changes are in the blue strikeout and red underline. The text in black is already part of the GP. There are no Land Use Map changes or Community Plan changes proposed for Fallbrook. On pages 4-1 through 4-3 (p. 69-71 in the pdf page counter), you'll find a few proposed text and policy corrections/clarifications that apply to the main GP document and entire unincorporated County. These are minor changes and we haven't heard of any concerns from anyone, so they're pretty non-controversial. County planner **Kevin Johnston**. (858) 694-3084, kevin.johnston@sdcounty.ca.gov. **Circulation committee**. Community input. Voting item. (4/11)

Ms. Burdick presented the topic. She stated that the Circulation Committee had reviewed the changes that the county was proposing. The Clean Up Plan involves no physical changes to the Fallbrook Circulation Element Network as approved in the General Plan of August 2011. It merely clarifies the description of two segments: #3 West/East Mission Road and #15 Old Highway 395. It also adds a new term to the General Plan Glossary entitled the "Urban Limit Line" relating to a growth boundary that defines maximum extent of urban and sub-urban development. Ms. Burdick stated that there were no areas identified as Urban Development in the Fallbrook area.

Mr. De Meo expressed concern with the presence of the term in the glossary.

After limited discussion Ms. Burdick motioned to approve the clean-up plan as submitted. The motion passed unanimously.

Jamul-Dulzura**JAMUL DULZURA
COMMUNITY PLANNING GROUP****Draft MINUTES****Tuesday, April 23, 2013****To be Approved May 14, 2013****Oak Grove Middle School Library****7:30 pm**

1. **Call to Order:** Jean Strouf called the meeting to order at 7:35 p.m.
2. **Roll Call:** Michael Casinelli, Judy Bohlen, Janet Mulder, Jean Strouf, Dan Kjonggaard, Elizabeth Kelly, Steve Wragg, Ray Deitchman, Preston Brown Earl Katzer, and Bill Herde

Excused: Joan Kouns, Randy White,

Absent: Yvonne Purdy-Luxton, Dale Fuller

7. GENERAL PLAN CLEAN UP COMMENTS DUE MAY 20TH: DAN NEIRINCKX - Jean announced that our comments are due by May 20, but Dan said he has been told they will take ours later as well. The County is recommending SR-2 to a redesignation of one parcel – our JD101 - from Public/Semi Public to Semi-Rural 2 to match surrounding parcels – 8 acres. The other area of change actually changes our policy 2G7 from ½ acre permissible in SR-1 – to the 1-acre minimum we requested. Two other items Dan suggests we comment on include: In our Community Plan (Page 9 under Land Use) Policy 5 to delete the part that references the FCI and the second is on page 14 in our Community Plan Chapter 4 – Recreation – Remove the comments that Policy 4 and 5 were deleted by GPA 8303 and just re-number all of our JDCP policies to clean up our Community Plan. **Michael Casinelli moved that we send a letter to Kevin Johnston and Bob Citrano stating same. Motion carried unanimously.**

Julian

From: jack@cableusa.com
Sent: Wednesday, June 12, 2013 10:54 AM
To: Johnston, Kevin
Subject: 2013 General Plan Draft Clean-Up Plan

Follow Up Flag: Follow up
Flag Status: Completed

Kevin; I apologize for misleading you regarding our review of the 2013 G.P. Draft Clean-Up Plan. We did in fact discuss the clean up plan as it related to designation changes in the Julian area at our May 13th meeting. After reviewing the changes it was the consensus that the Julian CPG would take no action nor would the Group make any recommendations in favor or opposed to the recommendations. Sorry for not getting back to you in May. Jack

Lakeside

LAKESIDE COMMUNITY PLANNING GROUP

FINAL MEETING MINUTES WEDNESDAY, JULY 3, 2013 – 6:30 PM

Members present: W. Allen, M. Baker, G. Barnard, J. Brust, J. Bugbee, L. Carlson, L. Cyphert (chair), M. Cyphert, C. Enniss (arrived late at 6:48pm), G. Inverso, K. Mitten, P. Sprecco.

Members Absent: T. Medvitz, L. Strom, B. Turner.

Public present: approximately 55

D. Draft 2013 General Plan Clean-Up (GPA 12-007) - The County of San Diego has amended several sections of the General Plan to provide clarification and to fix map errors and there is a full description of the proposed changes on the LCPG website.

Public Comment:

-Catherine Gorka spoke in general opposition to the proposed amendment to the property near her house. *A motion to recommend approval of the project was made by K. Mitten and seconded by M. Cyphert. Motion passed (8-4-0-3, J. Burst, G. Inverso, J. Bugbee, and C. Enniss dissented)*

Pala-Pauma

PALA - PAUMA COMMUNITY SPONSOR GROUP

P.O. Box 1273

Pauma Valley, CA 92061

Phone: 760-742-0426

REGULAR MEETING, MAY 7, 2013,

APPROVED MINUTES

1. CALL TO ORDER: 7:00 PM.

- a. Roll Call and quorum established: Five members were present: Andy Mathews, Chairman; Bill Winn, Vice Chairman; Fritz Stumpges, Secretary; Ron Barbanell; and Brad Smith. Stephanie Spencer and Ben Brooks were absent.

4. ACTION ITEMS:

- a. We reviewed a County 2013 Draft General Plan Clean-up that had been circulated. It contained no changes directly affecting us and apparently only minor changes overall. Bill moved to accept them as presented and Brad gave the second. Andy then brought up a possible concern that we might have with the GP as it exists. This was that traffic on the 5 mile stretch of State Route 76, roughly from the quarry to Pala, is already accepted as having a failing rating. The rationale for accepting this is that it would be very difficult to make changes to fix it. We have serious concerns with the increased traffic in the area from the new College and 3,000 homes going in at I15 and SR76 and now with additional traffic from the proposed 800 homes at Warner Ranch, 100 or so up on Adams and another 100 or so at and around Turnbull's. This is all in addition to increased traffic from the Harrah's expansion, possible growth of Casino Pauma, and anticipated growth of Pala Casino. Andy is concerned that the General Plan was based on old volumes that are no longer valid. We could all be very adversely affected by all of this new and possibly unanticipated growth. What should we do? We may need to seek changes in the GP's traffic element to address this new traffic. Fritz brought up the fact that in the past we, or at least previous group members, have gone on record in favor of keeping 76 a two lane road with turn outs and passing lanes; and opposed expansion to a 4 lane highway which would just encourage more development. Bill suggested that we have Andy sum up all of new proposed expansions and the ever increasing weekend recreational traffic. We need the traffic element to address the accumulative effects of all of these additions. Ron also brought up the 10 to 15 years that it will take for the state to actually do anything after they finally decide that it needs addressing. It was suggested that Andy craft a letter to DPDS, DPW and copy Caltrans and SANDAG with our concerns about the possibly overlooked new growth and projected increased traffic levels into the future. Then we will also have a record of our concerns to work with. Nikki mentioned that the county was proceeding with a North County Economic Development Council model which ignores the unrealistic SANDAG model. They are developing a study with incredible depth that can use new tools, such as the Joint Powers Agreement, to leverage all available assistance. She invited us to an upcoming meeting to see this new "Prosperity On Purpose" and encouraged us to contact Bill Horn and his staff with our concerns. Ron so moved and Bill gave the second. It passed 5-0.

Pine Valley

REGULAR MEETING MINUTES

May 14, 2013

Pine Valley Clubhouse

28890 Old Hwy 80, Pine Valley, CA.

3. ROLL CALL

PRESENT: Vern Denham, Cherry Diefenbach, Jennie Munger, Story Vogel,
Warren Larkin, Dorothy Haskins, Anne Steinemann, Brandon Perry

ABSENT: Terry Glardon, Matt Rabasco, Duane Mason

- b. Reviewed the 2013 General Plan Clean-up (GPA-012) County of San Diego Planning & Development Services as it pertains to Pine Valley.

Motion: To approve the 2013 clean-up plan.

Cherry Diefenbach

2nd Story Vogel

Vote passed 8-0

Rainbow

Minutes Rainbow Planning Group June 19, 2013

Call to Order: June 19, 2013 at 7:00 PM by Chairperson Drake

Roll Call:

Present: Pete Bacot, Bud Swanson, Frederick Rasp, Jim Anderson, Gary Drake, Dianne Rohwer-Johnson, , Julio Avila, , Curtis Nicolaisen, William Crocker, Nita Pearce, Mila Bonner

Absent: Dennis A. Sanford, Keith Flanagan, Ron Trotter

A quorum was declared by Chairman Drake

Community and County Action Items:

Bob Citrano and Kevin Johnson, both from County Planning, were present to answer any questions with regard to the "County General Plan Clean-up items – Land use Map Changes" that the Rainbow Planning Group was to vote on.

The Planning group requested that the county keep Rainbow better apprised of all County issues concerning Rainbow.

Vote to approve County G P Clean-up Items – Land use Map Changes:

RB 4 Mapping Error (Redesignate approx. six acres of a 32 acre parcel from Rural Lands 20 to General Commercial) aka Stubblefield Property

Approved

RB 101 Ownership Change (Redesignate one parcel from Public Agency Lands to Tribal Lands 86 acres)

Approved

RB 2 Ownership Change (Redesignate one parcel purchased by the County DPR from Rural Lands 40 to Open Space Conservation 93 acres)

Approved

Vote to approve County General Clean-up Items – Non-Land Use Map Changes

Policy COS 1.1.2 – Change wording from "Required" new development to preserve and maintain the existing agricultural uses to "Encourage" new development to...

Approved

Policy COS 1.3.1 – Change wording from "Require development projects to locate mitigation within the Rainbow CPA" to "The Community Planning Group prefers that Development projects in Rainbow CPA secure Biological resources mitigation within the Rainbow CPA"

RPGI voted to recommend to adopt alternative wording as in

Keven Johnson's letter, 2nd paragraph and also add these word to

Community Plan

2.2 – Habitat Protection through Site Design. Require development to be sited | |
in the least biologically sensitive areas and minimize the loss of natural

habitat.

Approved

Ramona

County of San Diego
Ramona Community Planning Group
FINAL MEETING MINUTES

May 2, 2013

7:00 PM @ Ramona Community Library, 1275 Main Street

A regular meeting of the Ramona Community Planning Group (RCPG) was held May 2, 2013, at 7 p.m., at the Ramona Community Library.

ITEM 1: ROLL CALL (Piva, Chair)

In Attendance:	Torry Brean	Jim Cooper	Matt Deskovick
	Scotty Ensign	Carl Hickman	Eb Hogervorst
	Kristi Mansolf	Donna Myers	Jim Piva
	Dennis Sprong	Paul Stykel (Att. 7:12)	Richard Tomlinson
	Kevin Wallace		

Excused Absence: Chad Anderson, Barbara Jensen

B. Draft 2013 General Plan Cleanup that Includes 2 Referrals with a Change in Former Salvation Army Property Land Use Designation to Open Space (portion Purchased by County Parks) (RM 101); Change in Land Use Designation from RL 40 to RS 4 for Teyssier Property With Approved Tentative Map 5194 (RM 15). Comments Due 5-20-13

Ms. Mansolf said the Draft 2013 General Plan Cleanup (DGPC) includes the Teyssier property and the addition of the Salvation Army property which has been purchased recently by County Parks. The RCPG had requested the Teyssier property be a referral since it had already been an approved Tentative Map while the General Plan Update was occurring. The County considered this and said there were already parcels designated 4 acres in the area, so the change would fit in.

The Salvation Army land will become open space and will be part of the Boulder Oaks open space. The part of the Salvation with the camping facilities was sold to the Mormon Church. No change is proposed for that piece of land.

The last item on the DGPC is they are changing the part of Highland Valley Road, our only local TIF road, to be 2 lanes with intermittent turn lanes from the City limits to Archie Moore Road, and the median has been eliminated from the plan.

MOTION: TO SUPPORT GPA 12-007, DRAFT 2013 GENERAL PLAN CLEANUP.

Upon motion made by Kristi Mansolf and seconded by Torry Brean, the motion passed 12-0-1-0-2, with Matt Deskovick abstaining, and Chad Anderson and Barbara Jensen absent.

San Dieguito

SAN DIEGUITO PLANNING GROUP

P. O. Box 2789, Rancho Santa Fe, California 92067

MINUTES OF MEETING

MAY 23, 2013

1. CALLED TO ORDER 7:10 P.M. PLEDGE OF ALLEGIANCE
present: Willis, Clotfelter, Lemarie, Dill, Jones, Liska, Epstein, Hoppenrath, Osborn, Christenfeld
absent: Barnard, Arsivaud-Benjamin

2013 General Plan Clean-Up – Community Planning/Sponsor Group Recommendations

5. GENERAL PLANNING ITEMS:

- A. **Plans for Expenditure of PLDO funds** – Request by County Parks and Recreation for amendments or additions to San Dieguito Planning Area Priority List for 5-year plan – please submit proposals to the chair, vice chair, or secretary in advance of the meeting if possible. We are getting pressure from the County to provide a list, soon. **No action taken.**
- B. **Community & General Plan Update - Continued from 5-9-2013** Review of proposed draft changes for submittal of comments and corrections to DPLU. Advance Planner: Kevin Johnston, 858.694.3084; SDPG Planner: Lois Jones 760-755-7189 The subject covers:
 - the Introduction describes the GP Clean-Up purpose and process – p. 1-1, 1-2 (p. 8-9 in the pdf page counter)
 - brief text descriptions of the proposed Land Use Map changes are on p. 2-1 and 2-3 (11 & 13 in the pdf page counter)
 - page 3-2 and 3-3 (20 & 21 in the pdf page counter) have additional information on proposed Land Use Map changes (# of parcels, acreage, existing/proposed designations, estimates of change in potential dwelling units, descriptions of Land Use designations and zoning information links)
 - the community map of San Dieguito with proposed Land Use Map changes outlined is on p. 3-33 (p. 51 in the pdf page counter)
 - zoomed in maps of each proposed Land Use Map change for San Dieguito are on 3-34 through 3-37 (p. 52 – 55 in the pdf page counter)
 - proposed corrections/clarifications for countywide General Plan policies/references are on 4-1 through 4-6 (p. 69 – 74 in the pdf page counter)
 - proposed policy revisions for the Elfin Forest/Harmony Grove portion of the San Dieguito Community Plan are on 4-20 (p. 88 in the pdf page counter)

MOTION by Lois Jones to recommend approval of the proposed “alternative Policy Language” presented as well as the other changes presented at last meeting. Seconded: Christenfeld

Ayes = 9 nos = 0 abstain = 0

Spring Valley

Spring Valley Community Planning Group

P.O. Box 1637, Spring Valley, CA 91978

Regular Meeting held on 6/11/13

Meeting held at San Miguel Fire Station District Headquarters

2850 Via Orange Way, Spring Valley, CA 91977

Members:

- | | |
|---------------------------------|----------------------------|
| 1. Bob Eble | 9. Clifton Cunningham |
| 2. Lora Lowes | 10. Vacant |
| 3. Jeff Hansen | 11. Vacant |
| 4. Marilyn Wilkinson, Secretary | 12. Walter Lake |
| 5. Vacant | 13. Edward Woodruff |
| 6. John Eugenio | 14. James Comeau, Chairman |
| 7. Richard Preuss | 15. L. Ben Motten |
| 8. Michael Daly, Vice Chairman | |

Chairman Comeau called the meeting to order at 7:00 with 12 members present. The minutes of 5/13/2013 were approved as corrected. Vote -10-0-2. Daly and Cunningham abstained.

- 4. 2013 General Plan Clean Up. Kevin Johnston requests vote of concurrence with all changes presented at 28 May meeting. Mobility element changes, and two land use map changes. Presenter: Lowes. Proponent: Johnston. All requested changes need to be voted on. Lowes made a motion to approve. Vote 11-0-0, in agreement.

Spring Valley
Community Planning Group &
Design Review Board
Minutes Of Regular Meeting
28 May 2013
San Miguel Fire District Headquarters
2850 Via Orange Wy Spring Valley Ca 91978

Members:

- | | |
|--------------------------------------|------------------------|
| 1- Bob Eble. | 9- Clifton Cunningham. |
| 2- Lora Lowes. | 10-Vacant. |
| 3- Jeff Hansen. | 11-Vacant. |
| 4- Marilyn Wilkinson, Secretary (A). | 12-Walter Lake. |
| 5- Vacant. | 13-Edward Woodruff. |
| 6- John Eugenio. | 14-James Comeau, Chair |
| 7- Richard Preuss. | 15-L Ben Motten. |
| 8- Michael Daly, Vice Chair (A). | |

Chairman Comeau called meeting to order 7.04PM with nine members present. Ten members were present at 7.09PM. No minutes were presented.

3- 2013 General Plan Cleanup. Presenters: Lowes, Woodruff. Proponents: Kevin Johnston, Robert Citrano. Discussion. Lowes moved to approve Option 3 of County plan. Vote 10-0-0.

Sweetwater

From: Sheri Todus [stodus@sbcglobal.net]
Sent: Monday, May 13, 2013 1:43 PM
To: Johnston, Kevin
Subject: Re: 2013 General Plan Clean-up (GPA 12-007)

Clean up reviewed under at meeting and there did not seem to be any need to vote.

Valley Center

Valley Center Community Planning Group														
Minutes of the 10 June, 2013 Meeting														
Chair: Oliver Smith; Vice Chair: Ann Quinley; Secretary: Steve Hutchison														
7:00 pm at the Valley Center Community Hall; 28246 Lilac Road, Valley Center CA 92082														
A=Absent/Abstain BOS=Board of Supervisors PDS=Department of Planning & Development Services N=Nay P=Present R=Recuse SC=Subcommittee VC= Valley Center VCCPG=Valley Center Community Planning Group Y=Yea														
Forwarded to Members: 5 July 2013														
Approved: 8 July 2013														
A Call to Order and Roll Call by Seat #:										7:05 PM				
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
L A V E N T U R E	H U T C H I S O N	E V A N S	G L A V I N I C	B R I T S C H	F R A N C K	Q U I N L E Y	V I C K		N J O O R H W N O S O D N	S M I T H	J A C K S O N	R U D O L F	B O B D A V I S	B R E T D A V I S
A	P	A	P	P	P	P	A		P	P	P	P	P	P
Notes:														
Quorum Established: 11 present														

E2

Discussion and vote on approving the Valley Center portion of the Draft 2013 General Plan Bi-Annual Clean-Up GPA. The county has asked for a formal VCCPG vote on the two items related to Valley Center. (Smith/Rudolf)

- a) VC101 Change the Abe Buolos property zoning from RR to C32
- b) VC102 Change the former Lilac Ranch property zoning from SPA to open space (purchased by CalTrans as Mitigation Land for SR76 construction).

Specifics on the proposed changes may be found at:

<http://www.sdcounty.ca.gov/pds/advance/2013GPBiAnnualClnUp.html>

Motion: Move to approve the County's change for Lilac Ranch from SPA to open space

Maker/Second: Rudolf/Jackson

Carries/Fails: [Y-N-A] 10-1-0 Voice; Glavinic dissents

Motion: Move to approve change of Boulos property from RR to C32

Maker/Second: Smith/Glavinic

Carries/Fails: 4-7-0 [Y-N-A]

L A V E N T U R E	H U T C H I S O N	E V A N S	G L A V I N I C	B R I T S C H	F R A N C K	Q U I N L E Y	V I C K		N J O O R H W N O S O O D N	S M I T H	J A C K S O N	R U D O L F	B O B D A V I S	B R E T D A V I S
	N		Y	N	N	N			Y	Y	N	N	N	Y

Motion: Move to reject change of Boulos property from RR to C32

Maker/Second: Rudolf/Quinley

Carries/Fails: 7-4-0 [Y-N-A]

L A V E N T U R E	H U T C H I S O N	E V A N S	G L A V I N I C	B R I T S C H	F R A N C K	Q U I N L E Y	V I C K		N J O O R H W N O S O O D N	S M I T H	J A C K S O N	R U D O L F	B O B D A V I S	B R E T D A V I S
	Y		N	Y	Y	Y			N	N	Y	Y	Y	N

Valley Center Community Planning Group

Minutes of the April 9, 2012 Meeting

Chair: Oliver Smith; Vice Chair: Ann Quinley; Secretary: Steve Hutchison

7:00 pm at the Valley Center Community Hall; 28246 Lilac Road, Valley Center CA 92082

A=Absent/Abstain A/I=Agenda Item BOS=Board of Supervisors DPLU=Department of Planning and Land Use IAW=In Accordance With N=Nay
P=Present R=Recuse SC=Subcommittee TBD=To Be Determined VCCPG=Valley Center Community Planning Group Y=Yea

Forwarded to Members: 1 May 2012

Approved: 7 May 2012

1.		Call to Order and Roll Call by Seat #:								7: 05 PM					
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	
A N D E R S O N	H U T C H I S O N	H O F L E R	G L A V I N I C	B R I T S C H	F R A N C K	Q U I N L E Y	V I C K	L E W I S	N J O O R H W N O S O O D N	S M I T H	J A C K S O N	R U D O L F	D A V I S	B A C H M A N	
P	P	A	P	P	P	P	P	P	P	P	P	P	P	A	

Notes: Bachman excused; Lewis arrives 7.15pm

Quorum Established: 12 present

Motion: Move to accept Subcommittee report [appended] and recommend the DPLU staff meet with Mr. Boulos to discuss available alternatives for his Canyon Road parcel.

Maker/Second: Rudolf/Anderson										Carries/Fails 5-8-2 [Y-N-A]				
A N D E R S O N	H U T C H I S O N	H O F L E R	G L A V I N I C	B R I T S C H	F R A N C K	Q U I N L E Y	V I C K	L E W I S	N J O O R H W N O S O O D N	S M I T H	J A C K S O N	R U D O L F	D A V I S	B A C H M A N
Y	Y	A	N	Y	N	N	Y	N	N	N	N	Y	N	A

Notes: Hofler and Bachman absent

Motion: Move to Support Boulos in retaining commercial designation of some type, but no more intensive than C34, such as office/professional, with the issue coming back to VCCPG for review from DPLU

Maker/Second: Glavinic/Davis										Carries/Fails: 10-3-2 [Y-N-A]				
A N D E R S O N	H U T C H I S O N	H O F L E R	G L A V I N I C	B R I T S C H	F R A N C K	Q U I N L E Y	V I C K	L E W I S	N J O O R H W N O S O O D N	S M I T H	J A C K S O N	R U D O L F	D A V I S	B A C H M A N
N	N	A	Y	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	A

Valle De Oro

County of San Diego
 Valle De Oro Community Planning Group
 P.O. Box 936
 La Mesa, CA 91944-0936

REGULAR MEETING MINUTES: May 7, 2013

LOCATION: Otay Water District Headquarters
 Training Room, Lower Terrace
 2554 Sweetwater Springs Blvd.
 Spring Valley, California 91978-2004

1. CALL TO ORDER: 7:00 PM Jack L. Phillips, Presiding Chair

Members present: Brownlee, Feathers, Fitchett, Henderson, Manning, Perry, Phillips, Reith, Schuppert, Tierney, Wollitz

Absent: Hyatt, Myers, Mitrovich

b. 2013 General Plan Clean-up:

- 1) Redesignates parcels 506-010-62 and 65 and 5060-200-20 on Campo Road near Jamacha Road from Public/Semi Public to Limited Impact Industrial (Subareas VDO 102 & 104.)

PHILLIPS presented. Parcels are in location with difficult access. He believes that Limited Impact Industrial zoning (M52) is a good use for the parcels. Item will be combined with the following item for vote.

2) Redesignates parcels 518-020-16, 29, 35, 39, 40, 41, 46, 48, 49, 50, 51, 52, 53, 62, and 67 along the north side of Willow Glen Drive between Steele Canyon Road and Hillsdale Road. Parcels changed from Village Residential 2 to Semi-rural 0.5 (Subarea VDO103.)

PHILLIPS presented. County made an error in their mapping. The zoning should have been SR-0.5. Phillips **moved** to support the County's proposal for Subareas VDO 102 & 104 and VDO103 (Brownlee seconded.)

VOTE: to approve 12-0-0.

3) General Plan Policy clean-up changes to the General Plan policy document, community/subregional plans and Mobility Element network detailed in Section 4 of the document.

PHILLIPS presented and **moved** to support their clean-up items. (Reith seconded). **VOTE: to approve 12-0-0.**

From: Pacific Southwest Railway Museum [pacificsouthwestrailwaymuseum@gmail.com]
Sent: Wednesday, April 10, 2013 1:49 PM
To: Johnston, Kevin
Subject: GPA 12-007 San Diego General Plan Clean-Up

Kevin Johnston:

The Pacific Southwest Railway Museum owns property included in the GPA 12-007 San Diego General Plan Clean-Up designed as ME-103. The Museum is supportive of the GPA to designate these parcels as Public/Semi-Public land use and looks forward to the opportunity to change the zoning to support the railway museum operations in these parcels.

Thank you for the opportunity to comment on the GPA.

Jim Lundquist
Director of Museum Services
Pacific Southwest Railway Museum
4695 Nebo Dr
La Mesa, CA 91941-5259

ENDANGERED HABITATS LEAGUE

DEDICATED TO ECOSYSTEM PROTECTION AND SUSTAINABLE LAND USE



May 17, 2013

VIA ELECTRONIC AND U.S. MAIL

Kevin Johnston
 Land Use/Environmental Planner
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123
kevin.johnston@sdcounty.ca.gov

RE: General Plan “Clean-Up” (GPA 12-007)

Dear Mr. Johnston:

The Endangered Habitats League (EHL) appreciates the opportunity to comment on the proposed General Plan “Clean-up” Amendment process. While EHL generally endorses the need for this process to fix errors and omissions resulting from the complex comprehensive Update that was concluded in August of 2011, this process should not be used to accommodate privately motivated substantive plan changes at public expense. Moreover, the proposed Property Specific Requests included in the Clean-Up individually and severally constitute changes that exacerbate adverse environmental impacts and create internal inconsistencies with the Guiding Principles that make up the framework of the Update. We therefore urge the County to remove the PSRs from the General Plan “Clean-Up.”

A Supplemental EIR May Be Required Under CEQA.

It is well settled that modifications to a project for which an EIR has been certified can require additional environmental review in a subsequent or supplemental EIR where “[s]ubstantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effect.” (CEQA Guidelines § 15163, subd(a)(1).) The County has the affirmative burden to show that such effects will not occur if it chooses to rely on an “addendum” to a previously certified EIR (as opposed to a subsequent or supplemental EIR) after making project modifications. CEQA Guidelines § 16153, subd. (e) states: “A brief explanation of the decision not to prepare a subsequent EIR pursuant to Section 15162 should be included in an addendum to an EIR, the lead agency's findings on the project, or elsewhere in the record. The explanation must be supported by substantial evidence.”

The four PSRs included in the Clean-Up, when considered cumulatively, have the potential to worsen traffic, GHG and air quality impacts, increase habitat fragmentation,

further stress groundwater resources, and disrupt community character. For example, RM-15 in Ramona will impact nearly 300 acres and add 37 units in a remote, high fire-risk and groundwater-dependent area. NM-16 will place semi-rural densities adjacent to an area reserved for conservation and surrounded by rural zoning.

The County has made no showing that more severe, unexamined and therefore unmitigated impacts will not occur. Indeed, at least two of the requests were *never* previously analyzed in any of the alternatives in the GPU EIR to which any addendum would attach; that they were granted project-level MNDs under the *previous* planning regime is irrelevant. Never before in the long PSR process has the County considered environmental review under the former General Plan as a substitute for environmental review under the new General Plan. To take one salient example, the analysis of impacts to Land Use under the former General Plan would be entirely different than such analysis under the new Plan – a plan which *thoroughly* revamps land use principles, goals and policies and redistributes growth accordingly. Also, the MND's were adopted up to 6 years ago, with environmental studies predating that. There can be no assumption of no significant impacts for these projects without *supplemental* environmental review.

The PSRs Create Impermissible Inconsistencies with the Update's Guiding Principles.

More fundamentally, three of the four requests proposed for processing as part of the “clean-up” are not remotely consistent with the Update's Guiding Principles. We address this point as to each request in more detail below.

Ramona RM15

RM15 would change the permitted densities on a nearly 300-acre PSR from RL-40 to SR-4, even though most of the surrounding land is in rural densities. To cure the spot zone, an additional 103 acres is involved. The stated rationale for this PSR is an existing tentative map at these densities, even though there is no guarantee that the Map will ever be built out. Almost all the land is constrained by steep slopes and high fire risk. Agricultural lands are found in the eastern portion. The project is simply residential sprawl into a rural area.

Staff never really addresses these constraints, relying principally on the existence of a tentative map. But the existence of a map should be irrelevant to the planning process, since planning to conform to a tentative map would negate the expiration times that are an integral part of the Subdivision Map Act. Indeed, the very reason that tentative maps have a shelf life is to permit local jurisdictions to plan free from such constraints.

General Plan conflicts for RM15 include but are not limited to:

- Guiding Principle 2 (Community Development Model) (encroachment into RL40)
- LU-1.1, LU-1.2, LU-10.3, LU-5.3

- Guiding Principle 5 (hazards and constraints)
- LU-6.11
- Guiding Principle 8 (agriculture)
- LU-7.1
- Guiding Principle 9 (infrastructure) (outside CWA)
- H-1.3

The incorrect categorization of RM15 also hinges upon its status as an unrecorded but inconsistent subdivision. Contrary to arguments made in correspondence by the landowner, the proposed change was *never* analyzed as part of any EIR alternative, but was instead part of a cumulative impacts analysis of pending subdivisions. This summary analysis cannot substitute for analysis of this project's impacts as part of a project alternative, and additional CEQA review—consistent with a moderate or major change—would be required. The applicant has every opportunity to finalize the tentative map; otherwise, the public interest is served by reverting to the new General Plan.

San Dieguito SD2

SD2 would convert about 54 acres from SR-4 to SR-2; most of the re-planned land is outside the PSR to cure a spot zone. Again, the stated rationale for this PSR is an existing tentative map with a higher density, even though there is no guarantee that the Map will ever be built out. The existence of a map should be irrelevant to the planning process, since planning to conform to a tentative map would negate the expiration times that are an integral part of the Subdivision Map Act. Indeed, the very reason that tentative maps have a shelf life is to permit local jurisdictions to plan free from such constraints. Zoning to conform to a tentative map would negate these statutory time limits. Independent of the map, it is clear the SR-2 designation is inconsistent with the significant habitat values on the site, as well as its location in a high fire risk area.

General Plan conflicts for SD2 include but are not limited to:

- Guiding Principle 2 (Community Development Model)
- Guiding Principle 4 (stewardship)
- LU-6.1
- Guiding Principle 5 (hazards and constraints)
- LU-6.11
- Guiding Principle 8 (agriculture)
- LU-7.1

The incorrect categorization of SD2 also hinges upon its status as an unrecorded but inconsistent subdivision. Contrary to information in a previous staff report (June 20, 2012), the proposed change to SR-2 was *never* analyzed as part of any EIR alternative. Instead, it was merely part of a cumulative impacts analysis of pending subdivisions. This summary analysis cannot substitute for analysis of this project's impacts as part of a project alternative, and additional CEQA review—consistent with a moderate or major

change—would be required. The applicant has every opportunity to finalize the tentative map; otherwise, the public interest is served by reverting to the new General Plan.

North Mountain NM16

NM16 represents a classic situation of robbing Peter to pay Paul. The owner sold a portion of a rural landholding for conservation (and possibly reaping associated tax benefits) and now seeks to recover all the units the owner would have had if the land had not been sold by increasing densities on the remainder area—a portion with very high habitat values and very high fire risk—by up-planning it from rural densities to a semi-rural SR-10 category.

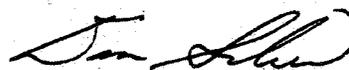
General Plan conflicts for NM16 include but are not limited to:

- Guiding Principle 2 (CDM)
- LU-1.1, LU-1.3, LU-1.4, LU-9.2
- Guiding Principle 4 (stewardship)
- LU-6.2
- Guiding Principle 5 (hazards and constraints)
- LU-6.11, S-1.1, S-7.1
- Guiding Principle 9 (infrastructure) (outside CWA)
- H-1.3

Staff itself had concluded in January that “[d]ue to the remoteness of the property, the application of Semi-Rural designations does not support the project objectives to reduce public costs and promote growth near existing jobs, services and infrastructure” and that such a change was a “major” one that is inconsistent with the Update’s Guiding Principles.” Staff now appears to conclude exactly the opposite, noting that the sale of lands into conservation “mitigates” these impacts. But the issue is not about mitigation of impacts, it is about planning consistent with the rules the Board adopted in the Update, including evenhanded application of the Community Development Model. This arbitrary change in position contravenes the Community Development Model and numerous goals and policies. In addition, this PSR sets a terrible precedent, generating expectations of additional revenue beyond the fair compensation, and tax benefits often received, in a conservation sale.

In conclusion, in order to ensure a legally sound addendum for the legitimate items proceeding under the Clean-Up, we urge you to remove the above PSRs from the Clean-Up.

Yours truly,



Dan Silver
Executive Director

SheppardMullin

Sheppard Mullin Richter & Hampton LLP
501 West Broadway, 19th Floor
San Diego, CA 92101-3598
619.338.6500 main
619.234.3815 main fax
www.sheppardmullin.com

Michael Hansen
619.338.6590 direct
mhansen@sheppardmullin.com

May 20, 2013

File Number: 06JM-112762

VIA E-MAIL AND U.S. MAIL

Kevin Johnston
Planning and Development Services
County of San Diego
5510 Overland Avenue, Suite 310
San Diego, CA 92123
E-Mail: kevin.johnston@sdcounty.ca.gov

Re: Comments on Draft 2013 General Plan Clean-Up Plan (GPA 12-007)

Dear Mr. Johnston:

On behalf of our client, Rancho Guejito Corporation, we appreciate the opportunity to submit comments on the Draft 2013 General Plan Clean-Up Plan, GPA 12-007 ("Clean-Up" or "GPA"). The GPA is intended to provide a regular mechanism for making changes to the General Plan to allow for corrections discovered during the General Plan's implementation or to reflect changing circumstances.

Please note that two lawsuits are pending in court which could result in the invalidation and rescission of the General Plan Update program environmental impact report (GPU EIR). In September 2011, Rancho Guejito filed a Verified Petition for Writ of Mandate and Complaint for Declaratory and Injunctive Relief, San Diego Superior Court Case No. 37-2011-000974236-CU-TT-CTL (General Plan EIR Lawsuit) alleging, among other things, that the GPU EIR violated CEQA. In November 2011, Rancho Guejito filed a second Verified Petition for Writ of Mandate and Complaint for Declaratory and Injunctive Relief, San Diego Superior Court Case No. 37-2011-00100332-CU-WM-CTL (General Plan Lawsuit), alleging substantive violations of the State Planning and Zoning Law related to deficiencies in the General Plan Update. If the court grants the petition for either the General Plan Lawsuit or the General Plan EIR Lawsuit, the Clean-Up GPA and its environmental analysis would likely be thrown into question and subject to challenge, to the extent that the Clean-Up GPA relies on the GPU or GPU EIR.

We are concerned that the Clean-Up's addition of a definition for "Urban Limit Line" goes beyond the intent of the Clean-Up GPA to make corrections or reflect changing circumstances. The County proposes the following definition of Urban Limit Line:

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Kevin Johnston
 May 20, 2013
 Page 2

A growth boundary that defines the maximum extent of urban and sub-urban development. An Urban Limit Line may be the basis for containment of growth inducing urban infrastructure or for community-specific goals and policies. (GPA, at 4-3.)

According to the Clean-Up, the rationale for adding this definition is for clarification because the term is referred to in the General Plan but not defined. First, we disagree that a definition is needed. The General Plan reference to Urban Limit Lines already explains the meaning of Urban Limit Lines and makes clear that it is up to each community to define what the meaning of an Urban Limit Line according to specific community goals and policies:

When updating Community Plans, communities are encouraged to delineate areas within their plans that will assist with the future planning of developments, infrastructure, facilities, and regulations. An Urban Limit Line and/or Village Boundary may be defined in the Community Plan as a community-specific growth boundary that identifies an area to which development should be directed. These boundaries may also serve as the basis for community specific goals and policies. (GPA, at 1-11.)

There is no need for an overarching re-definition of Urban Limit Line, which could conflict with the definitions specified in each Community Plan, because there is only one reference in the entire General Plan to Urban Limit Line, other than references in the Community Plans. The General Plan states, "[s]ewer systems and services shall not be extended beyond either Village boundaries or extant Urban Limit Lines," and lists a few exceptions such as when allowed by a Community Plan and when necessary for conservation subdivision. (GP, at LU-14.4.) Here, the language clearly defers to the Community Plans.

The re-definition of Urban Limit Line in the Clean-Up GPA takes discretion away from communities because the re-definition is much more restrictive than the existing definition. The definition of Urban Limit Line in the existing General Plan on page 1-11 is less restrictive and more flexible than the one now proposed. The existing definition says that each community can identify "an area to which development should be directed." The proposed definition says that the Urban Limit Line is "the maximum extent of suburban and urban development" which has a much more restrictive meaning. The new definition also states that the Urban Limit Line is the "basis for containment of growth inducing urban infrastructure," which implies that projects outside the line will have significant growth inducing impacts solely based on their location. This conflicts with the language in Policy LU-14.4 which allows sewer systems and other services to be extended beyond Urban Limit Lines if allowed by a Community Plan and when necessary for conservation subdivision.

Most importantly, the re-definition appears to be a backdoor attempt in the glossary section of the General Plan to create a strict urban growth boundary that prohibits future development and infrastructure improvements in the backcountry. That goal is far beyond the limited scope of the Clean-Up GPA to make minor corrections. Rancho Guejito requests that the re-definition of Urban Limit Line be removed from the Clean-Up GPA. It has broad policy and environmental impacts that should be fully vetted by the public, not buried within a clean-up amendment. Moreover, we request that the Clean-Up

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Kevin Johnston
May 20, 2013
Page 3

GPA provide a graphic showing the extent of the Urban Limit Line, and that future Community Plan amendments and updates that include the concept of an Urban Limit Line also provide a graphic depicting the line. Without a graphic, it is difficult for individual property owners to determine whether their property is subject to the restrictions imposed by the Urban Limit Line.

Thank you for providing us the opportunity to comment.

Very truly yours,



Michael Hansen
for SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

SMRH 408517064.2

cc: Hank Rupp, Rancho Guejito Corp.



P. O. Box 420 • 786 Palm Canyon Drive • Borrego Springs, CA 92004
760.767.5555 • Fax: 760.767.5976 • BorregoSpringsChamber.com

June 19, 2013

Mr. Kevin Johnston
Land Use/Environmental Planner
County of San Diego
Planning and Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

Dear Mr. Johnston,

In line with our mission and pursuant to a unanimous vote of a quorum of the Board of Directors, please accept this as the Borrego Springs Chamber of Commerce's letter of support to County staff's "Proposed Changes to 2013 General Plan Clean-Up Borrego Springs Community Plan Policy Revisions" dated May 21, 2013 (copy attached).

Please feel free to call me if you have any questions.

Kind regards,

A handwritten signature in black ink, appearing to read "Linda Haddock", with a long horizontal flourish extending to the right.

Linda Haddock
Executive Director

cc: Supervisor Bill Horn, Fifth District, County of San Diego
Members, Board of Directors, Borrego Springs Chamber of Commerce

Proposed Changes to 2013 General Plan Clean-Up Borrego Springs Community Plan Policy Revisions

Proposed revisions to the Borrego Springs Community Plan and follow-up action items, based on discussions at the subcommittee and general meetings of the Sponsor Group on May 2.

Page	Section	Revision	Rationale
35	LU 3.5.1	<p>Require an approved landscaping plan for all development and redevelopment for which it requires a building permit, Minor or Major Use Permit, Special Plan, or Tentative Map for all areas outside structures that requires the use of only those plant species and groupings native to the Sonoran Desert, with a preference for the use of species and groupings native to the Colorado Desert. <u>When a landscape plan is required, the Borrego Springs Community Sponsor Group encourages the use of species and groupings native to the Sonoran Desert, with a preference for the use of species and groupings native to the Colorado Desert.</u></p> <p><u>The preference of the Community Sponsor Group is that all single family residences restrict their landscape palette to plant species and groupings native to the Sonoran Desert.</u></p>	The requirement for a Landscape Plan for all building permits is inconsistent with the County Water Conservation in Landscaping Ordinance and Planning and Development Services Procedures (Form 658 Minimum Essential Items for Plans). Stricter requirements for Borrego can be sought through changes to the ordinances rather than the General Plan.

Follow up action items for County staff:

- Coordinate with the Borrego Springs Community Sponsor Group and other stakeholders to add information on desert appropriate native landscaping to the County's Landscape Design Manual.
- Coordinate with the Borrego Springs Community Sponsor Group and other stakeholders to create a one-page informational handout on desert appropriate native landscaping that will be on the County web site and available at the Zoning Counter. Maximum Applied Water Allowance (MAWA) forms that must be signed by applicants for single family residential building permits with an associated landscaping area of less than 5,000 square feet will have a link to form.
- Consider revising the Desert water usage maximums for the MAWA during the next revisions to the Landscape Ordinance to make it harder to introduce high water landscaping that is not appropriate for the desert and does not fit community character.

Page	Section	Revision	Rationale
38	LU 3.9.1	<p>Residential Restrict structures outside the Village Core <u>are encouraged to maintain a low profile to retain and enhance views of the surrounding mountains-area to single-story construction.</u></p> <p><u>The preference of the Community Sponsor Group is to limit the height of buildings outside the Village Core to single story structures.</u></p>	Prohibiting multi-story construction outside the Village Core is inconsistent with the Zoning Ordinance and would require rezoning most of the properties zoned for residential development in the planning area.

Based on discussions at the Sponsor Group subcommittee level, staff and subcommittee members felt the proposed revision could be supported.

Page	Section	Revision	Rationale
84	Policy N 2.2.1	<p>Require, prior to issuing a certificate of occupancy for any new residential construction or reconstruction in the CPA, that all swimming pool equipment, HVAC equipment and similar noise-producing adjunct facilities <u>to be suitably planned, sited and enclosed so as to prevent limit noise trespass onto adjoining parcels.</u></p> <p><u>The low ambient noise level in the desert should be considered when permitting noise-producing equipment in Borrego Springs.</u></p> <p><u>The Sponsor Group recommends updates to the Noise Ordinance to establish different decibel level thresholds for Borrego Springs that take into account ambient noise levels.</u></p>	The requirement to prevent noise trespass on adjoining parcels is inconsistent with the County Noise Ordinance. Most residential zones allow 50 dBA at the property line during the day and 45 dBA during the night.



P. O. Box 420 • 786 Palm Canyon Drive • Borrego Springs, CA 92004
760.767.5555 • Fax: 760.767.5976 • BorregoSpringsChamber.com

June 19, 2013

Mr. Kevin Johnston
Land Use/Environmental Planner
County of San Diego
Planning and Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

Dear Mr. Johnston,

In line with our mission and pursuant to a unanimous vote of a quorum of the Board of Directors, please accept this as the Borrego Springs Chamber of Commerce's letter of support to County staff's "Proposed Changes to 2013 General Plan Clean-Up Borrego Springs Community Plan Policy Revisions" dated May 21, 2013 (copy attached).

Please feel free to call me if you have any questions.

Kind regards,

A handwritten signature in black ink, appearing to read "Linda Haddock", with a long, sweeping underline.

Linda Haddock
Executive Director

cc: Supervisor Bill Horn, Fifth District, County of San Diego
Members, Board of Directors, Borrego Springs Chamber of Commerce



February 12, 2013

Attn: Robert Citrano
Planning Manager, Advance Planning Division
San Diego County
Department of Planning and Land Use
5201 Ruffin Road, Suite B
San Diego, CA 92123-1666

Re: SB 18 Consultation for the 2013 General Plan Clean-Up, an Amendment to the General Plan

The Soboba Band of Luiseño Indians appreciates your observance of Tribal Cultural Resources and their preservation in your project. The information provided to us on said project(s) has been assessed through our Cultural Resource Department, where it was concluded that although it is outside the existing reservation, the project area does fall within the bounds of our Tribal Traditional Use Areas. At this time the Soboba Band does not have any specific concerns regarding this project.

[SPECIAL NOTE (for projects other than cell towers): *If* this project is associated with a city or county specific plan or general plan action it is subject to the provisions of SB18-Traditional Tribal Cultural Places (law became effective January 1, 2005) and will require the city or county to participate in **formal, government-to-government** consultation with the Tribe. If the city or county are your client, you may wish to make them aware of this requirement. By law, they are required to contact the Tribe.

Sincerely,

A handwritten signature in black ink, appearing to read "JOE", is written over a vertical line that extends from the signature down to the typed name below.

Joseph Ontiveros
Director of Cultural Resources
Soboba Band of Luiseño Indians appreciates
P.O. Box 487
San Jacinto, Ca 92581
Phone (951) 654-5544 ext. 4137
Cell (951) 663-5279
jontiveros@soboba-nsn.gov

**PALA TRIBAL HISTORIC
PRESERVATION OFFICE**

PMB 50, 35008 Pala Temecula Road
Pala, CA 92059
760-891-3510 Office | 760-742-3189 Fax



April 17, 2013

Bob Citrano
Planning Manager, Advance Planning Division
Planning & Development Services
5510 Overland Avenue, Suite 110
SanDiego, CA 92123

Re: Invitation to Participate in SB 18 Consultations for 2013 General Plan Clean-up, An Amendment to the General Plan

Dear Mr. Citrano:

The Pala Band of Mission Indians Tribal Historic Preservation Office has received your notification of the project referenced above. This letter constitutes our response on behalf of Robert Smith, Tribal Chairman.

We have consulted our maps and determined that the project as described is not within the boundaries of the recognized Pala Indian Reservation. It is, however, within the boundaries of the territory that the tribe considers its Traditional Use Area (TUA). Because this project references a GPA update and not an actual development project, we do not request consultation at this time. However, if the project is modified to include any sort of construction or other ground-disturbing activity, we wish to be notified so we can reassess the need for consultation.

We appreciate involvement with your initiative and look forward to working with you on future efforts. If you have questions or need additional information, please do not hesitate to contact me by telephone at 760-891-3515 or by e-mail at sgaughen@palatribe.com.

Sincerely,

Shasta C. Gaughen, PhD
Tribal Historic Preservation Officer
Pala Band of Mission Indians



PECHANGA CULTURAL RESOURCES
Temecula Band of Luiseño Mission Indians

Post Office, Box 2183 • Temecula, CA 92593
 Telephone (951) 308-9295 • Fax (951) 506-9491

May 8, 2013

Chairperson:
 Germaine Arenas

Vice Chairperson:
 Mary Bear Magee

Committee Members:
 Evie Gerber
 Darlene Miranda
 Bridgett Barcello Maxwell
 Aurelia Marruffo
 Richard B. Searce, III

Director:
 Gary DuBois

Coordinator:
 Paul Macarro

Cultural Analyst:
 Anna Hoover

VIA E-MAIL and USPS

Mr. Bob Citrano
 Planning Manager, Advance Planning Division
 Planning & Development Services
 County of San Diego
 5510 Overland Ave, Suite 110
 San Diego, CA 92123

Re: Pechanga Tribe Request for Consultation Pursuant to SB 18 for the 2013 General Plan Clean-Up, an Amendment to the General Plan

Dear Mr. Citrano:

This letter is written on behalf of the Pechanga Band of Luiseño Indians (hereinafter, "the Tribe"), a federally recognized Indian tribe and sovereign government in response to the SB 18 notice provided by County of San Diego dated February 7, 2013. This letter serves as the Tribe's formal request for consultation under SB 18 for this Project. At this time, we request that a face-to-face meeting with representatives of the County be scheduled as soon as possible so that we can begin discussing our concerns regarding the above referenced Project. The Tribe is currently concerned about the North Mountain and Ramona areas as well as several other study areas. We would like to discuss these and possibly other areas as well as the proposed County Policies during our consultation.

Further, the Tribe formally requests, pursuant to Public Resources Code §21092.2, to be notified and involved in the entire CEQA environmental review process for the duration of the above referenced project (the "Project"). Please add the Tribe to your distribution list(s) for public notices and circulation of all documents, including environmental review documents, archeological reports, and all documents pertaining to this Project. The Tribe further requests to be directly notified of all public hearings and scheduled approvals concerning this Project. Please also incorporate these comments into the record of approval for this Project.

The Pechanga Tribe asserts that the northwestern portion of the County is within Luiseño territory, and therefore the Tribe's, aboriginal territory as evidenced by the existence of Luiseño place names, *tóota yixélval* (rock art, pictographs, petroglyphs), village complexes and an extensive Luiseño artifact record in various planning areas proposed for clean-up. During our

Pechanga Comment Letter to the County of San Diego
Re: Pechanga Tribe Request for SB 18 Consultation RE 2013 General Plan Clean-Up
May 8, 2013
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consultation we will provide more specific, confidential information on the resources located on and near the proposed areas of concern.

As you may know, the County of San Diego is rich with Luiseño history, not only in relation to the Mission Period of California but also centuries before European contact. This history is very important to the Luiseño People and the Pechanga Tribe has much information about their ancestors in the County. The Tribe is aware of multiple place names and cultural resources that would be impacted by the proposed General Plan Clean-Up. The Tribe would like to share this information which will assist the County in developing culturally sensitive and appropriate policies for the County.

As you know, the SB 18 consultation process is ongoing and continues for the duration of the Project. As such, under both CEQA and SB 18 we look forward to working closely with County of San Diego on ensuring that a full, comprehensive environmental review of the Project's impacts is completed. Further, we hope to assist the County with ensuring that the Project is designed to avoid impacts to cultural resources, as mandated by CEQA, in addition to developing mitigation measures addressing the culturally appropriate and respectful treatment of human remains, cultural resources and inadvertent discoveries.

In addition to those rights granted to the Tribe under SB 18, 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. Further, the Tribe reserves the right to participate in the regulatory process and provide comment on issues pertaining to the regulatory process and Project approval.

The Pechanga Tribe looks forward to working together with the County of San Diego in protecting the invaluable Pechanga cultural resources found in the County. Please contact me at 951-770-8113 or at cozdil@pechanga-nsn.gov once you have had a chance to review these comments so that we might address the issues concerning the mitigation language. Thank you.

Sincerely,



Tuba Ebru Ozdil
Tribal Planner

cc: Kevin Johnson, San Diego County Planning Department
Dixie Switzer, Tribal Liaison
Pechanga Office of the General Counsel

*Pechanga Cultural Resources • Temecula Band of Luiseño Mission Indians
Post Office Box 2183 • Temecula, CA 92592*

Sacred Is The Duty Trusted Unto Our Care And With Honor We Rise To The Need