

Draft Responses to Comment Letter X

Individual  
 Tom and Judy Myers  
 March 18, 2013

	Comment	Response to Comment
X-1	<p>Comments on Forest Conservation Initiative General Plan Amendment Draft Supplemental Environmental Impact Report</p> <p>These comments are sent to the County of San Diego Planning &amp; Development Services:</p> <p>We have reviewed the sections of the subject report as they pertain to the Alpine Planning Area and wish to make the following comments:</p> <p>We do not support the Modified Project Alternative because we believe that there is a better alternative that is more rational, satisfies the interest of most of the Alpine residents and is environmentally better than this alternative or the Working Draft Plan proposed by the General Plan Amendment.</p>	<p>The County acknowledges the commenter’s opposition to the Proposed Project and the reduced alternative (Modified Project Alternative).</p>
X-2	<p>The Modified Project Alternative seeks to reduce environmental impact of the General Plan Amendment by limiting growth in focus areas A-1, A-2, and A-4 to the levels of the Former FCI (1 dwelling per 40 acres) but ignores focus area A-3 which is the second largest contributor of net increase average daily trips (ADT) in this report. Increased density in these four areas impacts the environment by requiring major road improvements and extension of water, sewer, and related utilities. Focus area A-5 also remains the same as the proposed General Plan</p>	<p>This comment appears to be referring to focus areas that are identified in the Traffic Impact Assessment (TIA), Appendix D of the SEIR. The focus areas identify parcels in Alpine that are forecast to result in a significant increase in average daily trips (ADT). Build out of the parcels in these Focus Areas based on land use designation proposed by the Draft Land Use Map analyzed as the Proposed Project in the Draft SEIR, would result in an increase in ADT as follows:                      A-1: 9,565; A-2: 86,415; A-3: 13,556; A-4: 2,529; A-5: 1,656 (see SEIR Appendix D: Traffic Study, page 8). Staff agrees</p>

**Draft Responses to Comments**

	<b>Comment</b>	<b>Response to Comment</b>												
	<p>Amendment as the environmental consequences of development at the level proposed are almost insignificant.</p>	<p>that the Modified Project Alternative did propose land use designation changes to Focus Areas A-3 and A-5. Staff developed the Modified Project Alternative based on comments received during the NOP comment period and no comment letters were received requesting land use changes in these areas.</p> <p>Note: the Focus Areas identified in the TIA include areas of consideration identified in the Planning Commission staff report as follows:</p> <table border="0"> <tr> <td>Focus Area</td> <td>Areas of Consideration</td> </tr> <tr> <td>A-1</td> <td>AL-1, AL-2A, AL-2B</td> </tr> <tr> <td>A-2</td> <td>AL-3</td> </tr> <tr> <td>A-3</td> <td>AL-4, AL-5, AL-11 (eastern parcels)</td> </tr> <tr> <td>A-4</td> <td>AL-6, AL-7</td> </tr> <tr> <td>A-5</td> <td>AL-11 (western parcel)</td> </tr> </table>	Focus Area	Areas of Consideration	A-1	AL-1, AL-2A, AL-2B	A-2	AL-3	A-3	AL-4, AL-5, AL-11 (eastern parcels)	A-4	AL-6, AL-7	A-5	AL-11 (western parcel)
Focus Area	Areas of Consideration													
A-1	AL-1, AL-2A, AL-2B													
A-2	AL-3													
A-3	AL-4, AL-5, AL-11 (eastern parcels)													
A-4	AL-6, AL-7													
A-5	AL-11 (western parcel)													
<p><b>X-3</b></p>	<p><u>We propose a new Environmentally Exceptional Project Alternative</u> that is superior to the Working Plan and all alternatives analyzed in the SEIR. We would describe this alternative as follows.</p> <ul style="list-style-type: none"> <li>For Focus Areas A-1 through A-4 allow development at the SR-4 level which is largely consistent with the existing General Plan Update. This will allow 1 dwelling per 4, 8 or 20 acres depending on slope. Although a preferable level of development would be 1 dwelling per 5 acres, this choice is not available in the Land Use Density policy. However, the Alpine Community Plan prohibits extending water and sewer utilities beyond the existing service area, and the Groundwater Ordinance sets a limit of 1 dwelling per 5 acres in this section of the County. When these two factors are applied to areas A1 thru A-4, the maximum density will effectively be 1 dwelling per 5 acres.</li> </ul>	<p>The County acknowledges and appreciates this comment supporting a new Environmentally Exceptional Project Alternative. Similar to what is suggested in this comment, County staff has developed a staff recommendation based on comments received during public review of the Draft SEIR. The staff recommendation takes into account, among other considerations, the forecasted traffic and resulting levels of service on roads in Alpine. While not consistent with the commenter’s proposal for a SR-4 designation for all parcels included in Focus Areas A-1 through A-4, the staff recommendation includes reduced land use intensities beyond those proposed by the Modified Project Alternative. In addition, the following staff recommendations are less than or equally as intensive than both the Modified Project and the commenter’s Environmentally Exceptional Alternative:</p> <ul style="list-style-type: none"> <li>A-1 — Reassign two parcels to the northwest of Viejas with SR-1 designations to Tribal Lands and reassign 20 parcels</li> </ul>												

**Draft Reponses to Comments**

	<b>Comment</b>	<b>Response to Comment</b>
		<p>to the northwest of Viejas with SR-1 designations to SR-10</p> <ul style="list-style-type: none"> <li>• A-3 — Reassign four parcels in southwestern portion of focus area from SR-2 to RL-40</li> </ul> <p>The County acknowledges that the current Alpine Community Plan restricts urbanized development outside of current water and sewer infrastructure boundaries. However, this project proposes to revise the Community Plan to allow an extension of infrastructure boundaries to allow build-out of the Staff Recommendation in Focus Areas A-2 and A-3. This proposed plan change represents the desires of the Alpine Community Planning Group. In addition, the Community Plan has not been comprehensively update since 1979 and portions of the plan no longer reflect the desires of the Alpine Community Planning Group.</p>
<b>X-4</b>	<ul style="list-style-type: none"> <li>• For Area A-5, allow development in accordance with the General Plan Amendment which is based on the Working Draft Plan proposed by the Community Planning Group and is the same as the Modified Project Alternative. This will permit development of 1 dwelling per 20 or 40 acres as requested by the community.</li> </ul>	<p>This comment is referring to Focus Area A-5 identified in the Draft SEIR TIA (see response to comment X-2 above). A-5 primarily consists of the portion of the Rancho Palo Verde development that was subject to the FCI. This community is generally already subdivided at lot sizes of approximately two acres. If the commenter is proposing densities of one dwelling unit per 20 or 40 acres for Focus Area A-5, then the commenter would not be in support of the Draft Plan or Modified Project Alternative as stated in the comment. The staff recommendation is to reduce the density of large unsubdivided parcels in focus Area A-5 to RL-40 (one dwelling unit per 40 acres) [the western parcel identified as area of consideration AL-11]. Therefore, buildout of the staff recommendation land use map would result in 504 fewer ADTs than Draft Plan and Modified Project alternatives. The remainder of this area is generally already subdivided and, when slope and other constraints are considered, would result in only a very limited increase in potential dwelling units.</p>

**Draft Responses to Comments**

	<b>Comment</b>	<b>Response to Comment</b>
<b>X-5</b>	<p>IMPACTS</p> <p>Development at the 1 dwelling per 5 acre level for areas A-1 thru A-4 without extending public water and sewer utilities will yield major cost savings and significant reductions in environmental impacts.</p>	<p>This comment supports reducing costs and environmental impacts by applying land use designations of one unit per five acres and not requiring the extension of water and sewer services. Staff disagrees that development at 1 dwelling unit per 5 acres for areas A-1 through A-4 (corresponding to Areas of Consideration AL-1 – AL-7, and the eastern parcels of AL-11.) would be appropriate for this entire area. The draft plan included a variety of land use designations that took into account site specific constraints and factors. In addition, the Alpine Community Planning Group’s desire to expand their population base so that the community would be able to support a broader range of services.</p>
<b>X-6</b>	<p>At steeper slopes, the number of dwellings will be governed by the Land Use Density designator, i.e. 1 dwelling per 8 acres for slopes over 20% or 1 dwelling per 20 acres for slopes greater than 50%.</p>	<p>This comment appears to be referring to semi-rural residential designations, which reduce density for slopes greater than 25% (not 20%). However, this comment does not raise a significant environmental issue for which a response is required.</p>
<b>X-7</b>	<p>The roadway impacts under this new Environmentally Exceptional Project Alternative will also be greatly reduced. The current General Plan anticipates an increase of 6,949 average daily trips (ADT) for areas A-1 through A-4 over the former FCI level of development.</p>	<p>This comment appears to have misinterpreted Table 5 of the Draft SEIR Traffic Impact Analysis (Appendix D, page 8). The 6,949 ADTs referenced by this comment are identified by adding Focus Areas A-1 through A-4 under the column “General Plan Update (GPU) ADT”. This column is referring to the number of trips analyzed in the GPU EIR, which assumes a RL-40 land use designation for all parcels subject to the FCI. This is not the same as the current General Plan, which is based on pre-FCI land use designations, primarily one dwelling per 4, 8, 20 acres. Therefore, the current General Plan would generate more ADT than the 6,949 ADT analyzed by the GPU EIR.</p>
<b>X-8</b>	<p>The proposed Modified Project Alternative shows no increase Land Use Density and no increase in ADT’s as compared to the Former FCI levels for areas A-1, 2, and 4, while the ADT’s for area A-3 will increase by 16,767. This</p>	<p>Again, this comment appears to have misinterpreted Table 5 of the Draft SEIR TIA (see response to comment A-7 above). The County does not concur that the Modified Project Alternative would not have an increase in ADT when</p>

## Draft Responses to Comments

	Comment	Response to Comment
	yields a total increase in ADT's for the Modified Project Alternative of 16,767.	compared to the former FCI levels in Focus Area A-1, which assumed a RL-40 designation for all parcels subject to the FCI. Since the Modified Project Alternative assumes higher densities than RL-40 in Focus Area A-1, this alternative would have a higher ADT in Focus Area A-1 when compared to the former FCI levels. Likewise under the Draft Plan and Modified Project Alternative, Focus Area A-3 results in a 13,556 ADT increase over the Former FCI levels (RL-40), not 16, 767 as indicated by the commentor (see the last column in TIA Table 5: Net Increase in ADT).
<b>X-9</b>	We estimate that our proposed Environmentally Exceptional Project Alternative will show a total increase in ADT's of less than 7,000 when the Groundwater Ordinance limits are superimposed on this area.	This comment lacks sufficient information to verify whether or not it is correct.
<b>X-10</b>	The result is that the number of ADT's under the Environmentally Exceptional Project Alternative as described herein will be less than half of the Modified Project Alternative described in the SEIR, and there will be a dramatic reduction in the environmental impact by eliminating the need to extend water and sewer utilities or develop more roadway capacity.	Again, this comment lacks the level of detail to verify if it is correct. The Environmentally Exceptional Project Alternative assumes a density of one dwelling unit per five acres for Focus Areas A-1 through A-4; however, the Modified Project Alternative assumes a density of one dwelling unit per 40 acres for Focus Areas A-2 & A-4. The commentor has not shown how the proposed Environmentally Exceptional Project Alternative would be less than one half of the Modified Project Alternative. Staff does acknowledge that the commentor's proposed Alternative would not require the extension of water and sewer utilities, whereas under the Modified Project Alternative, water and sewer facilities would need to be extended to support the densities proposed for Focus Area A-3, however this alone does not mean that it would avoid impacts better than the Modified Project Alternative.
<b>X-11</b>	At the same time, most of the residents and property owners will be allowed to develop their property at the levels they originally requested.	This comment does not provide sufficient evidence to justify this statement that most property owners would be allowed to develop their property at the level they originally requested.

**Draft Responses to Comments**

	Comment	Response to Comment
		Throughout the planning process property owners have been requesting densities consistent with those assigned by the SEIR Draft Plan. Ultimately, the Board of Supervisors will make the final determination on the appropriate land use designations to apply in this area.
X-12	Wildlife will also benefit by the lower density development distributed throughout the focus areas which will allow wildlife corridors to continue to exist while reducing fuel load for potential future wildfires.	The County acknowledges that lower densities throughout the focus areas are more appropriate for wildlife corridors and in areas susceptible to wildfire. However, the staff alternative is also recommending lower densities that also allow for wildlife corridors and would be appropriate for wildfire susceptible areas.
X-8	<p>CONCLUSION</p> <p>The San Diego Planning &amp; Development Services should explore more deeply this proposed Environmentally Exceptional Project Alternative because it:</p> <ul style="list-style-type: none"> <li>• offers the least impact of the all alternatives proposed</li> <li>• allows growth at the levels requested by most of the Alpine residents who participated in developing the proposed General Plan Amendment</li> <li>• avoids changes to the Alpine Community Plan</li> <li>• reduces wildfire fuel loads and protects wildlife by providing a widely distributed low density development as opposed to higher density development throughout a major section of the Plan area.</li> </ul>	<p>The County does not agree that additional project alternatives need to be considered, beyond what has already been analyzed. As previously stated, a staff recommendation has been developed that takes into account the following planning objectives:</p> <ol style="list-style-type: none"> <li>i. General Plan Community Development Model;</li> <li>ii. Consistency with existing land uses and parcel sizes;</li> <li>iii. Minimize development potential in the Urban-Wildland Interface</li> <li>iv. Minimize development without adequate access to public roads</li> <li>v. Consider physical and environmental constraints when assigning land use intensities</li> <li>vi. Community and stakeholder preferences</li> </ol> <p>The Staff Recommendation also considers both the analysis provided in the Draft EIR and the input provided in the 41 comment letters for the Draft SEIR and Draft Plan. Other than not requiring the extension of water and sewer services, the commenter has not shown how the Environmentally Exceptional Project Alternative meets the project objectives better than the Staff Recommendation.</p> <ul style="list-style-type: none"> <li>• The commenter has not provided conclusive evidence that</li> </ul>

**Draft Responses to Comments**

	<b>Comment</b>	<b>Response to Comment</b>
		<p>the proposed Environmentally Exceptional Project Alternative is the least impact of all alternatives proposed. See response to comment X-10.</p> <ul style="list-style-type: none"> <li>• As discussed in the response to comment A-11 above, the comment does not provide any evidence to support that the Environmentally Exceptional Project Alternative allows growth at the levels requested by most of the Alpine residents who participated in developing the proposed General Plan Amendment.</li> <li>• The County agrees that the Environmentally Exceptional Project Alternative would avoid changes to the Alpine Community Plan; however, this document was last comprehensively revised in 1979 and avoiding changes to this community plan are not a project objective.</li> <li>• The County agrees that the Environmentally Exceptional Project Alternative would reduce wildfire loads and protect wildlife. Likewise, the Staff Recommendation has been prepared based on comments provided by USFS staff and would achieve the same benefits</li> </ul> <p>Ultimately, the Board of Supervisors will determine the appropriate land use designations. The information in this comment will be in the Final EIR for review and consideration by the County Board of Supervisors.</p>

INTENTIONALLY LEFT BLANK