

Draft Responses to Comment Letter Z

**The Nature Conservancy
Alfredo Gonzalez
March 18, 2013**

	Comment	Response to Comment
Z -1	<p>The Nature Conservancy (Conservancy) appreciates the opportunity to comment on the Forest Conservation Initiative (FCI) Lands General Plan Amendment (GPA) Supplemental Environmental Impact Report (SEIR). The proposed project is a General Plan Amendment (GPA) to the San Diego County General Plan, previously adopted on August 3, 2011. The project will result in revision of the existing General Plan land use designation on a number of private parcels within and adjacent to the former FCI lands totaling approximately 72,000 acres within the unincorporated areas of the County, and will amend the Alpine, Central Mountain, Jamul/Dulzura and North Mountain community and subregional plans. The project will also involve an amendment to the County Zoning Ordinance to ensure that the zoning of the affected parcels is consistent with the proposed land use designations.</p>	<p>This comment is introductory in nature and does not raise a significant environmental issue for which a response is required.</p>
Z -2	<p>Based on our review of the SEIR and project alternatives, the Conservancy respectfully supports the Modified Project (Environmentally Superior) Alternative as the preferred alternative, not the Proposed Project. The Modified Project Alternative is more consistent with the intent of the now-expired FCI, while still allowing reasonable and more appropriate development in the affected lands compared to the Proposed Project. Compared to the Proposed Project, the Modified Project would reduce overall development by about 1,000 acres, reduce overall growth in the back country,</p>	<p>The County acknowledges the Nature Conservancy’s support for the Modified Project Alternative. This alternative will be available to decision makers and the Board of Supervisors will ultimately decide which land use designation to apply throughout the FCI project area.</p>

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	<p>and reduce environmental impacts (as described in Section 2 of the document). The Proposed and Modified projects would rely on the same mitigation measures, but the conservation values retained are greater with the Modified Project because it relies less on mitigation, which has inherently greater uncertainty than avoidance of impacts.</p>	
<p>Z -3</p>	<p>It is our conclusion that the Modified Project (Environmentally Superior) Alternative is more appropriate for a GPA that is intended to re-designate these lands to be consistent with the Guiding Principles and Policies of the adopted General Plan Update, specifically the following:</p> <ul style="list-style-type: none"> • Promote health and sustainability by locating new growth near existing and planned infrastructure, services, and jobs in a compact pattern of development; • 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; • Maintain environmentally sustainable communities and reduce greenhouse gas emissions that contribute to climate change; and • Minimize public costs of infrastructure and services and correlate their timing with new development. 	<p>The County acknowledges the support for the Modified Project Alternative in this comment. This information will be included in the Final SEIR for consideration by decision makers. In addition, it should be noted that a staff recommendation has been developed that takes into account comments received during the public review process, community preferences, and environmental constraints. Ultimately, the Board of Supervisors will make the final determination as to the appropriate land use designations to apply in the project area.</p>

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Z -4	As the Conservancy noted in our comment letter on the NOP (September 12, 2012), the intent of the FCI was to zone parcels at a 40-acre minimum size – reflecting their rural setting – and that zoning should be the norm for these properties absent unique circumstances. The former forest inholding lands are generally not close to public infrastructure or services, have high ecological value, and are in high fire risk zones. In keeping with the intent of the FCI and the Guiding Principles cited above, the GPA zoning (minimum parcel size) should be consistent with the lowest zoning tiers in the Land Use Element. Subsequent changes to the General Plan to accommodate necessary population growth and development should not occur in these parcels, but should remain within the existing Village or Semi-Rural zoned areas.	The issues and concepts raised in this comment are not inconsistent with the existing content of the SEIR.
Z -5	We believe the Modified Project Alternative, if adopted through the GPA, would reflect the appropriate land use and development planning for the former FCI and adjacent lands.	See responses to comments Z-2 and Z-3 above.
Z -6	Thank you for considering our concerns and recommendations regarding the FCI Lands Amendment. Please contact Bill Tippetts, San Diego Project Director (btippetts@tnc.org or 619-209-5830 x 14408), if you wish to follow-up on our comments.	This comment provides concluding remarks and does not raise an issue for which a response is required.

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