

Draft Responses to Comment Letter CC

The Endangered Habitats League

Dan Silver, MD

March 18, 2013

	Comment	Response to Comment
CC -1	<p>The Endangered Habitats League (EHL) appreciates the opportunity to supplement its main comment letter (submitted under separate cover) with these comments on specific map issues. For your reference, EHL is Southern California’s only regional conservation group and has been a stakeholder in County of San Diego planning efforts since 1993, serving on advisory committees for the MSCPs and the General Plan Update.</p>	<p>This comment is introductory in nature and does not raise a significant environmental issue for which a response is required. For responses to main comment letter, see responses BB-1 through BB-34.</p>
CC -2	<p>As a rule, the lowest rural densities should be applied to former FCI lands. Because these forest inholdings are often the most remote, most poorly served by infrastructure and services, most hazardous for fire, most GHG-intensive for auto use, and most ecologically intact, the Guiding Principles direct development elsewhere. The former FCI lands exemplify the need to strictly limit “rural residential” subdivision so that the Guiding Principles are achieved and taxpayer subsidies for far-flung scattered housing are minimized. That said, the GPA has to respect areas of existing parcelization with appropriate designations. But additional subdivision outside of established rural residential enclaves should be avoided.</p> <p>We are also concerned that developments –commercial or residential –not “leapfrog” outside of existing villages and water and sewer boundaries. For example, casino facilities –sited without regard to the Guiding Principles –should not</p>	<p>This comment addresses the merits of the FCI Lands GPA project and conformance with the Guiding Principles of the General Plan. It does not raise a significant environmental issue for which a response is required.</p>

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	trigger such leapfrog.	
CC -3	In general, EHL supports the Environmentally Superior (“Modified”) Alternative. The purpose of these comments is to highlight those select areas where we find the Modified Alternative is deficient in meeting the Guiding Principles. Narrative comments below refer to enclosed exhibits.	The County acknowledges and appreciates this comment supporting the Modified Project Alternative. As described in the introduction to these responses to comments (Pages ii-iii), a Staff Recommendation alternative has been prepared in response to these and many other comments received during public review of the Draft SEIR. The Staff Recommendation, which will be presented to the decision makers for consideration, would reduce potential impacts compared to the Proposed Project. The Staff Recommendation alternative is similar to Modified Project Alternative in most areas. Ultimately, the Board of Supervisors will determine which alternative will be implemented. The information in this comment will be in the Final SEIR for review and consideration by the County Board of Supervisors.
CC -4	Alpine We generally concur with the approach of the Modified Alternative except for a major defect south of I-8 and surrounding Star Valley Road to the south, east, and west. Due to large, un-subdivided parcels of up to 80 acres in size and the Guiding Principles goals referenced above, this area should be RL40 rather than SR2. 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. Of note is that the Conservation Subdivision, which could in a limited way mitigate the damage, is not required for SR2.	For reference, the subject area is part of the Area of Consideration that has been named “Alpine FCI-5” in the staff report for the Staff Recommendation and has been highlighted as an area for discussion during the upcoming public hearing process. The comment refers to a portion of this Area of Consideration that is designated Semi Rural 2 in the Draft Plan/Proposed Project, as well as in the Modified Project Alternative. The impacts associated with the SR-2 designation were analyzed in the draft SEIR and the decision makers will have the option to approve this proposal. However, it should be noted that the Staff Recommendation alternative proposes different designations for the subject area compared to what was shown in the draft SEIR. While County staff does not agree that a Rural Lands 40 designation should be applied to this area adjacent to Interstate-8, staff

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		<p>did find that more of a balance was needed for these properties. The Staff Recommendation includes a combination of SR-1, SR-4, and SR-10 in place of the SR-2 that was analyzed in the draft SEIR. The largest and most remote parcel (sized 80 acres) is shown as SR-10 and would, therefore, require a conservation subdivision if the property were subdivided. The parcels nearest to Alpine Boulevard are shown as SR-1. The SR-1 density will allow the extension of services along Alpine Boulevard to be feasible in the future. Finally, the remaining area is shown as SR-4. The SR-4 density is the most consistent with the existing conditions for this area and takes into consideration the need for five acres lots pursuant to the Groundwater Ordinance.</p> <p>The Board of Supervisors may choose from the alternatives discussed here, or may choose to further reduce the intensity proposed for this area as suggested in the comment. The information in this comment will be in the Final EIR for review and consideration by the County Board of Supervisors.</p>
<p>CC -5</p>	<p>-In regard to the East Willows Village in the proposed project, it not needed to meet population or housing targets and would produce adverse traffic impacts. Nor is there any evidence that it is needed for nearby casino employees. It is outside of village and water and sewer boundaries and inconsistent with LU-1.2. Any intensified development here should await a demonstrable need for additional General Plan capacity.</p>	<p>The County agrees that the proposed village for the eastern Willows Road area in Alpine will result in adverse traffic impacts, which is not inconsistent with the existing content in the draft SEIR. However, the County generally does not agree with the remainder of this comment. Also, the project proposes to assign a Mobility Element classification that would allow for a four lane road, rather than two lanes as currently adopted.</p> <p>For reference, this Area of Consideration has been named “Alpine FCI-3” in the staff report for the Staff Recommendation and has been highlighted as an area for discussion during the upcoming public hearing process. Both</p>

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		<p>the Draft Plan/Proposed Project and the Staff Recommendation propose an expansion of the Alpine Village in accordance with the Alpine Community Development Model (CDM). This expansion would continue to locate the highest densities of development in the linear Alpine Village at major transportation nodes, such as where Willows Road meets Alpine Boulevard and Interstate 8. The primary reasons for this proposal are discussed below.</p> <ul style="list-style-type: none"> i. This expansion continues previous patterns of growth for Alpine by expanding the Village along its primary circulation roads accordance with the modified Alpine CDM. ii. Expansion to the east along Willows Road will expand the community’s existing population base so that the community can support a high school, currently in the planning stages. iii. In 2007, the Board of Supervisors directed staff to consider site specific issues for Willows Road east area. iv. Proposed land use densities will facilitate expansion of imported water services to allow existing residents along Willows Road to avoid a future threat of a groundwater overdraft condition caused by existing and future development on adjacent jurisdictions outside the County’s land use authority. v. Revising the eastern end of Willows Road to a four-lane classification and assigning land use densities that would allow for the development of establishments providing goods and services to the community would contribute to refocused casino traffic from West Willows Road to eastern Willows Road. <p>Despite this rationale for the Staff Recommendation, the Board of Supervisors may choose to reduce the intensity</p>

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		proposed for this area. The information in this comment will be in the Final SEIR for review and consideration by the County Board of Supervisors.
CC -6	<p>While the County lacks the power to stop development on Tribal lands that undermines the County’s planning goals contained in the Guiding Principles, it does have the power to limit the damage by not using casino development as a rationale for permitting growth patterns that undermines these goals. Letting casino development dictate inconsistent land uses for adjacent areas will result in a vicious cycle as the adjacent development will eventually serve as an even stronger rationale for even more inconsistent development. Particularly where, as here, new growth-inducing urban infrastructure is introduced to accommodate this inconsistent growth, the character of the entire area risks being irrevocably altered in a manner that is fundamentally inconsistent with the County’s overall planning principles. Even worse, a disastrous precedent would be set for justifying casino-adjacent General Plan amendments that are inconsistent with the Guiding Principles in remote rural areas throughout the County.</p>	<p>The County acknowledges this comment which is opposed to using casino development as a rationale for permitting growth patterns that undermine the General Plan Guiding Principles.</p> <p>While the proposed village for the East Willows area in Alpine (Alpine FCI-3) is near the Viejas Casino, it is not intended to be “casino development.” It should also be noted that the subject area is not a remote rural area of the County. The proposed new village would have minimal impacts to Forest lands because this area is generally surrounded by Interstate 8, Rural Commercial designated lands, and Tribal Lands.</p> <p>The primary reasons for the proposed land use designations assigned to Alpine FCI-3 are explained in response to comment CC-5 above.</p>
CC -7	<p>But if, despite these compelling reasons, the final plan includes any intensification (residential or commercial) outside of water and sewer boundaries, it must only do so as a logical contiguous extension of existing development on lands under County jurisdiction.</p>	<p>As noted in responses to comments CC-5 and CC-6, the Staff Recommendation for the proposed East Willows Village in Alpine is the same as the Draft Plan/Proposed Project. When developing the Staff Recommendation alternative, consideration was given to how the water and sewer boundaries would need to expand. The land use patterns proposed by the Staff Recommendation are based on expanding the services in a logical manner, combined with adhering to the desires of the residents that currently living in this area.</p>
CC -8	Central Mountain -- Cuyamaca	For reference, the subject area referred to in this comment is

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	<p>There is a remote area which, on the basis of consistency with nearby parcels alone, should be RL80 rather than RL40.</p>	<p>with the Area of Consideration named “Cuyamaca FCI-1” in the staff report for the Staff Recommendation and has been highlighted as an area for discussion during the upcoming public hearing process.</p> <p>The impacts associated with a Rural Lands 40 designation for this area were analyzed in the draft SEIR. The decision makers for the project will have the discretion to apply the RL-40 designation, consistent with the Draft Plan/Proposed Project. However, the Staff Recommendation alternative proposes the RL-80 designation, consistent with this comment. The RL-80 designation is recommended based on the level of physical (steep slopes) and environmental (sensitive biological resources) constraints in this area, as well as a lack of access to public roads.</p>
<p>CC -9</p>	<p>North Mountain Near the Palomar Mountain community, an area now split on the Modified Alternative between RL10 and RL40 should be reconfigured based upon existing parcelization as a split between RL20 and RL40, or less preferably, the whole reconfigured at RL20.</p>	<p>For reference, this Area of Consideration has been named “North Mountain FCI-2” in the staff report for the Staff Recommendation and has been highlighted as an area for discussion during the upcoming public hearing process. As noted in the comment, the subject area is shown as Semi Rural 10 in the Draft Plan/Proposed Project as well as in the Modified Project Alternative. The impacts associated with the SR-10 designation were analyzed in the draft SEIR and the decision makers will have the option to approve this proposal.</p> <p>It should be noted, however, that the Staff Recommendation alternative proposes a Rural Lands 40 designation for the subject area, consistent with this comment. The rationale for recommending RL-40 is that the subject area is made up of large parcels that are adjacent to other large parcels that are proposed for the RL-40 designation.</p>

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CC -10	We look forward to continuing to work with the Department on this very important General Plan amendment.	This concluding comment does not raise a significant environmental issue for which a response is required.

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