



PECHANGA CULTURAL RESOURCES
Temecula Band of Luiseño Mission Indians

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

Chairperson
 Neal Ibanez

Vice Chairperson:
 Bridgett Barcello

Committee Members:
 Mary Bear Magee
 Evie Gerber
 Darlene Miranda
 Richard B. Scearce, III
 Michael Vasquez

Director:
 Gary DuBois

Coordinator:
 Paul Mucarro

Planning Specialist:
 Tuha Ebru Ozdil

Cultural Analyst:
 Anna Hoover

February 29, 2016

VIA E-MAIL and USPS

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

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

Dear Mr. Citrano:

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

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

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

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

Pechanga Comment Letter to the County of San Diego
Re: Pechanga Tribe Comments on the DSEIR for FCI Lands
February 29, 2016
Page 2

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

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

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

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

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

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

*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

Pechanga Comment Letter to the County of San Diego
Re: Pechanga Tribe Comments on the DSEIR for FCI Lands
February 29, 2016
Page 3

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

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

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

Sincerely,



Tuba Ebru Ozdil
Planning Specialist

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

*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

Lael Montgomery
13678 McNally Road
Valley Center, CA 92082

February 28, 2016

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

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

Dear Mr. Citrano,

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

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

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

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

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

Sincerely,



Lael Montgomery


SWEETWATER AUTHORITY

505 GARRETT AVENUE
 POST OFFICE BOX 2328
 CHULA VISTA, CALIFORNIA 91912-2328
 (619) 420-1413
 FAX (619) 425-7469
<http://www.sweetwater.org>

February 29, 2016

GOVERNING BOARD
 ERNESTO ZAMUDIO, CHAIR
 TERESA "TERRY" THOMAS, VICE CHAIR
 STEVE CASTANEDA
 JOSÉ F. CERDA
 RON MORRISON
 JOSE PRECIADO
 JESS VAN DEVENTER
 JAMES L. SMYTH
 GENERAL MANAGER
 JENNIFER H. SABINE
 ASSISTANT GENERAL MANAGER

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

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

Dear Mr. Citrano:

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

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

2.7.4.1. Water Quality Standards and Requirements

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

*A Public Water Agency
 Serving National City, Chula Vista, and Bonita*

Mr. Robert Citrano

Re: Comments on Draft Revised SEIR for Forest Conservation Initiative Lands, GPA 12-004
Sweetwater River Watershed Protection

February 29, 2016

Page 2

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

Alpine Land Use Map

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

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

Sincerely,



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

Enclosures



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

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

February 24, 2015
Final

February 24, 2015

GERALD W. FISHER

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

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

February 26, 2016

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

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

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

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

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

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

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

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

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

Reservation (gas station, store, campground, motocross), also setting a precedent.

The elevation all along the road raises our property, like a shelf, which puts it at risk for SDG&E to do the Rule 95 game.

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

[Summary]:

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

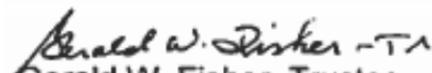
The benefit to SDG&E is there is no restriction on size of line. Current EIR is still in question. No maintenance cost for easement. SDG&E can take credit for "beautifying the landscape". SDG&E can take credit for the "ultimate fire protection" they will be providing.

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

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

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

Respectfully submitted,

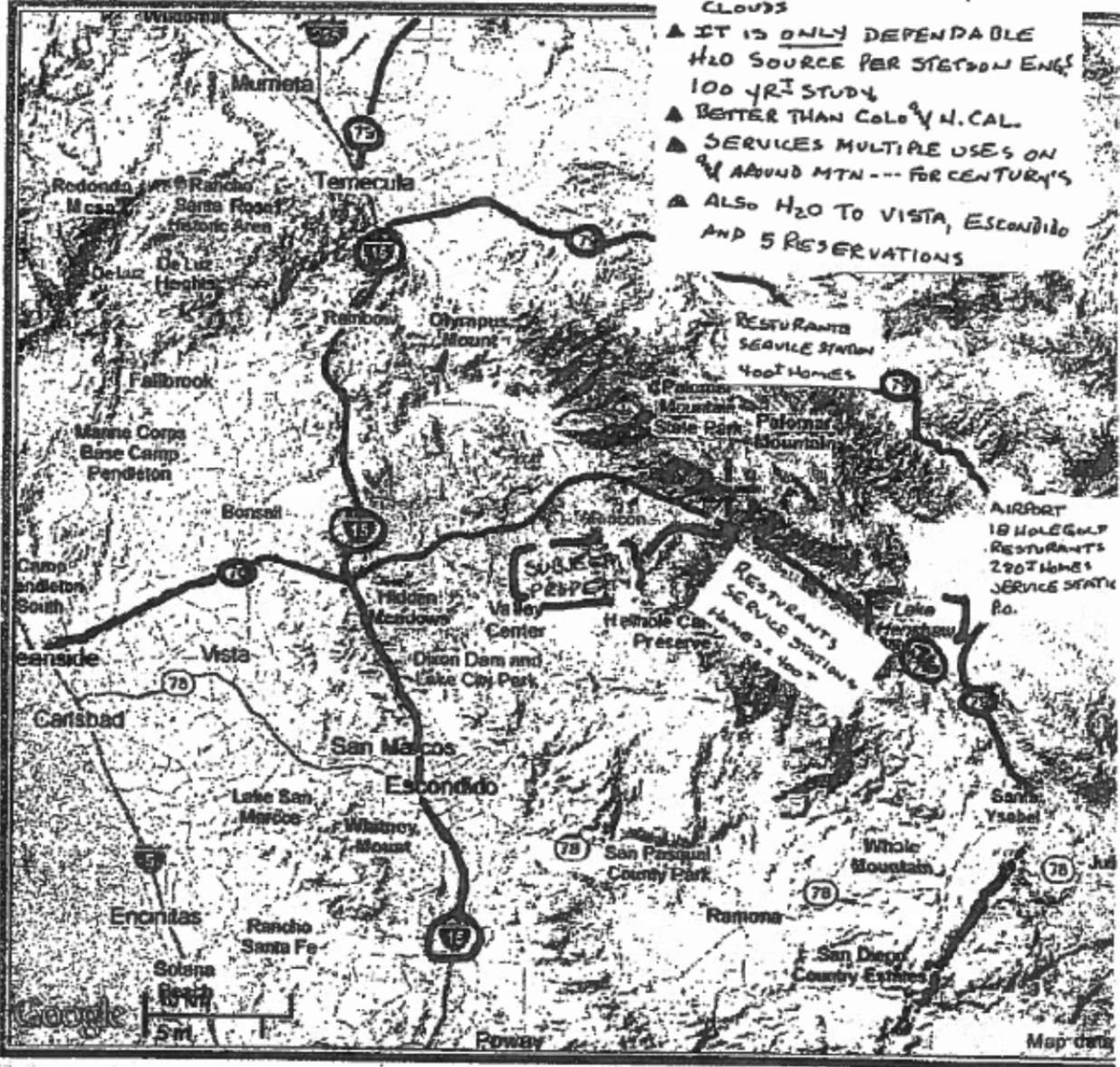

Gerald W. Fisher, Trustee

[MAP A]

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

b) Select station: select station

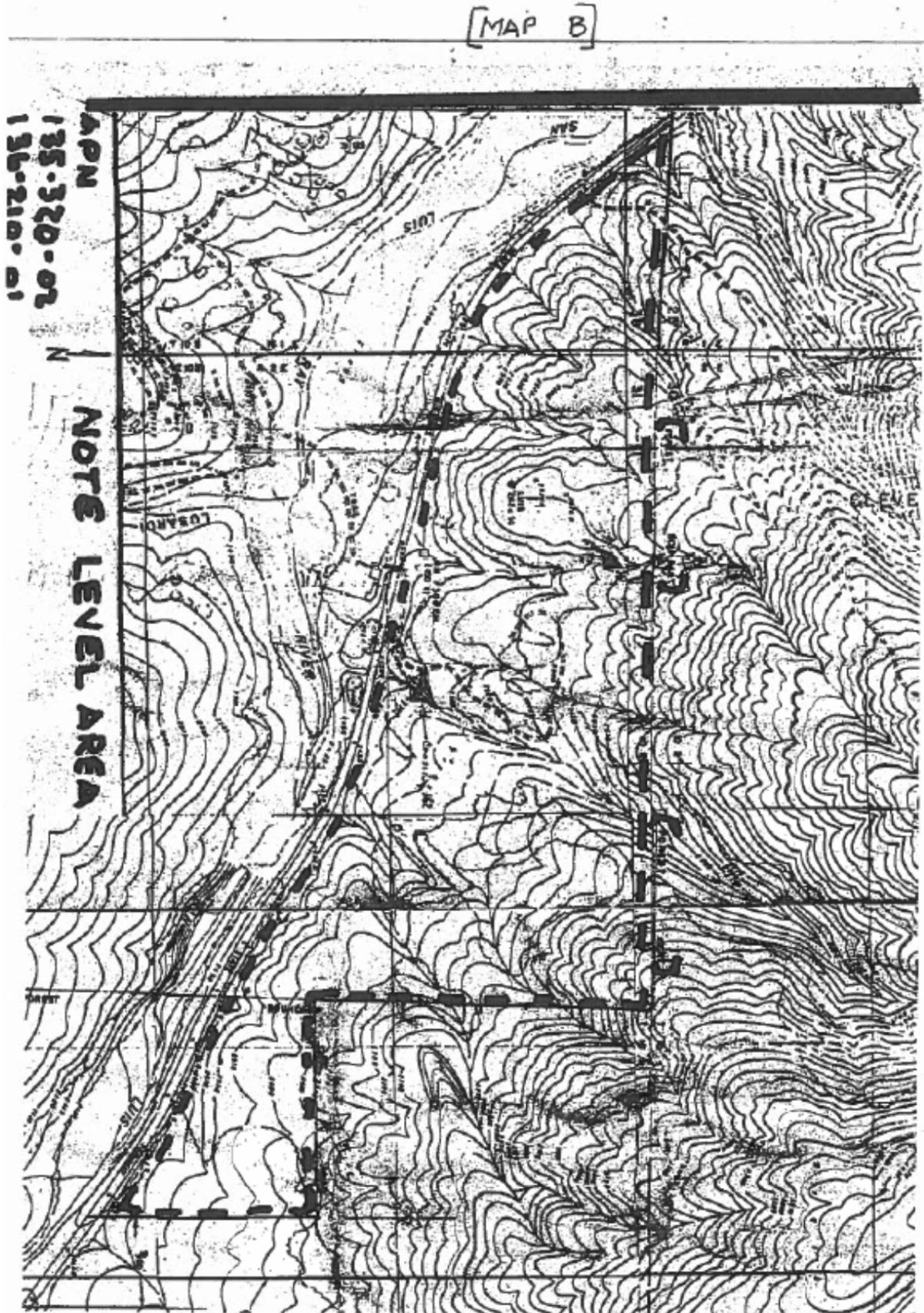
2. Use map:



PALOMAR MTN
 ▲ 5x 20 MILES ± WATER MAKER
 ▲ SQUEEZES H₂O BY UPPIING CLOUDS
 ▲ IT IS ONLY DEPENDABLE H₂O SOURCE PER STEPHEN ENG 100 YR STUDY
 ▲ BETTER THAN COLO & N. CAL.
 ▲ SERVICES MULTIPLE USES ON V AROUND MTN --- FOR CENTURY'S
 ▲ ALSO H₂O TO VISTA, ESCONDIDO AND 5 RESERVATIONS

RESTURANTS SEVILLE STATION 4007 HOMES
 AIRPORT 18 HOLE GOLF RESTURANTS 2907 HOMES SERVICE STATION Ro.

POINT PRECIPITATION FREQUENCY (P.F)
 WITH 90% CONFIDENCE INTERVALS AND SUPPLEMENTARY
 NOAA Atlas 14, Volume 6, Version 2





Department of Planning and Development Services

5510 Overland Ave. Ste. #300

San Diego, CA 92123

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

Attn: Mr. Peter Eichar

January 19, 2016

TO WHOM IT MAY CONCERN:

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

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

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

Thank you,



Becky Davis

Dorthiea Hinkle
3007 Blue Oak Court
Spring Valley, CA 91978

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

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

January 19, 2016

TO WHOM IT MAY CONCERN:

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

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

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

Thank you for your attention to my concerns.



Dorthiea Hinkle

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

January 27, 2016

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

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

Dear Mr. Eichar:

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

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

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

Thank you for your attention to our comments.

Sincerely,



Janice C Campbell



Colin L Campbell (Sr)

Charles Kaderabek & Lynn Augustyn

DEPARTMENT OF PLANNING AND DEVELOPMENT SERVICES

5510 Overland Ave. Ste 300

San Diego, CA 92123

Attn: Mr. Peter Eichar

RE: APNs 404-231-03 and 404-240-18

January 21, 2016

TO WHOM IT MAY CONCERN:

As the owner of these parcels totaling 78.42 acres, we have been working for several years toward achieving the classifications illustrated in the SEIR on both the Alpine "mid density" map and the Alpine "Land Use alternative Map". Our property was recommended for the classifications of VR-2 with a small area set aside for Rural Commercial in the Alpine Community Planning Group Plan, the Staff recommended plan, and the San Diego County Planning Commission Plan.

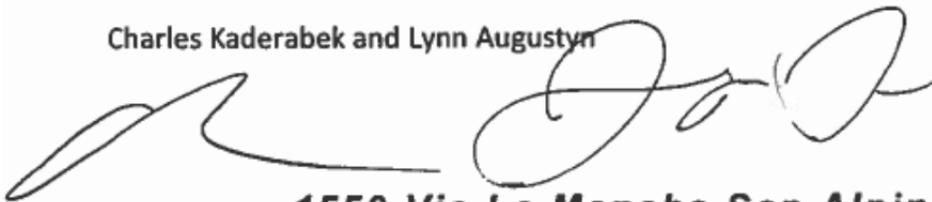
Our inclusion within the village of Alpine, our immediate proximity to the site of the future Alpine High School, as well as being inside the current Water Service Area makes this property very appropriate for higher density development.

We look forward to a hearing in the near future that will bring this matter to a pleasant conclusion. It has been a long four and a half years.

We support the classification of VR-2 over our residential land and Rural Commercial on 2.4 acres.

Thank you for your attention to our concerns.

Charles Kaderabek and Lynn Augustyn



1550 Via La Mancha San Alpine, CA 91901

Ph: 619-544-0339 Fax: 619-544-0567

Charles Kaderabek & Lynn Augustyn

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

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

Dear Mr. Eichar:

Our property is an immediate neighbor to the property located at 3535 Alpine Blvd. and known as the Campbell Creek Ranch; in fact, we surround it on (3) sides. We recognize that like our own property, the Campbell Ranch is within the Village Core, and must be expected to take its' share of the growth of our community. Much like our own property, Campbell's holding is within the water service area and can, at some point, be expected to have sewer available.

Therefore, we support the recommended designation of VR-2 as described in both the Alpine Mid Density Map and the Alpine Land Use Alternative map. This property, like our own, received the full support of the Alpine Planning Group and the SD County Planning Commission.

We look forward to the final resolution of this matter in the near future.

Sincerely,
Charles Kaderabek and Lynn Augustyn

A handwritten signature in black ink, appearing to be a cursive combination of the names Charles Kaderabek and Lynn Augustyn. The signature is fluid and spans across the width of the text area.