

SUMMARY OF CHANGES TO THE DRAFT SEIR

Introduction

This section includes text changes to the Draft Supplemental Environmental Impact Report (SEIR) for the Forest Conservation Initiative (FCI) Lands General Plan Amendment (GPA), dated January 2016. These modifications resulted from response to comments received during the Draft SEIR public review period as well as staff-initiated changes.

Revisions herein do not alter the conclusions of the environmental analysis such that new significant environmental impacts have been identified, nor do they constitute significant new information. Changes are provided in tracking mode (underline for new text and strike-out for deleted text). Minor text changes, such as typographical errors, were made to the Final EIR as necessary. However, these minor text changes are not included in this document.

Text Changes and Edits to the Draft SEIR

Recirculation Readers Guide

No changes were made to this section of the SEIR.

Acronyms and Abbreviations

No changes were made to this section of the SEIR.

Summary

- On Draft SEIR page S-1, the following new paragraph has been added at the top of the page, as follows:

This chapter is a summary of the Supplemental Environmental Impact Report (SEIR) for the County of San Diego Forest Conservation Initiative (FCI) Lands General Plan Amendment (GPA), prepared pursuant to the California Environmental Quality Act (CEQA). The environmental analyses and their technical appendices are included in Volume I of the SEIR. Changes between the Draft SEIR circulated for public review and the Final SEIR are shown in tracked changes mode. Comments on the Draft SEIR are provided in Volume II, which also includes responses to comments and a summary of revisions to the Draft SEIR. Finally, Volume III is an environmental analysis of the Recommended Project, which is the alternative derived through Planning Commission and Board of Supervisor hearings.

Chapter 1.0 Project Description, Location, and Environmental Setting

- Pages 1-13 to 1-14, Table 1-1C, Proposed Project Buildout and Additional Subdivision Potential, has been added, as follows:

Community	# Parcels	Acres	Number of Potential Residential Lots			
			SEIR Proposed Project		No Project (Existing GP)	
			Buildout	Additional	Buildout	Additional
Alpine	1,336	13,512	3,561	2,225	2,297	961
Central Mnt.	963	25,850	1,082	119	5,618	4,655
Cuyamaca	79	2,965	107	28	289	210
Descanso	589	5,581	615	26	1,340	751
Pine Valley	202	12,382	255	53	2,862	2,660
Unrepresented	93	4,921	105	12	1,127	1,034
Desert	2	166	2	0	8	6
Jamul/Dulzura	48	1,246	58	10	193	145
Julian	328	8,467	384	56	2,489	2,161
Mnt. Empire	40	2,051	52	12	385	345
L.Morena/Campo	38	1,562	49	11	331	293
Unrepresented	2	490	3	1	54	52
North Mnt.	882	17,221	907	25	3,612	2,730
Palomar Mnt.	786	12,093	806	20	3,022	2,236
Unrepresented	96	5,128	101	5	590	494
Pendleton/DeLuz	17	1,011	19	2	221	204
Ramona	159	725	180	21	239	80
TOTAL	3,775	70,250	6,245	2,470	15,062	11,287

Source: County of San Diego, Planning & Development Services, 2016.

Note: This table is based on high level GIS data and does not take into consideration of any site planning constraints that may reduce the potential number of new lots. In addition, the data does not include parcels proposed for non-residential uses, such as Open Space (Conservation), Public Agency Lands, Tribal Lands, and Rural Commercial.

- Page 1-14, a description of the new table has been added as follows:

The full potential buildout that would be allowed under the proposed Project is shown in Table 1-1A (see last column). Table 1-1C shows the potential number of additional residential lots that would be allowed under both the proposed Project and existing General Plan (No Project Alternative). This Table shows that, while the proposed Project would allow 6,245 lots at buildout, only 2,395 of these lots would be in addition to existing lots. This is substantially less potential lots than would be allowed by the existing General Plan, where 15,062 lots would result with full buildout, 11,212 of which would be in addition to existing lots.

- Page 1-44, text describing the AB 52 consultation has been added, as follows:

Assembly Bill 52 was enacted in 2014, with several provisions governing tribal cultural resources and early consultation with tribes. Assembly Bill 52 applies to EIRs for which the notice of preparation is issued after July 1, 2015. The notice of preparation for this EIR was issued in September 2012, so Assembly Bill 52 does not apply to this EIR. Nevertheless, the County elected to conduct consultation consistent with Assembly Bill 52. That consultation was initiated concurrent with the public review of the recirculated Draft SEIR in January 2016. The County consulted with the Viejas and Rincon Native American tribes and

provided a status of the Project, emphasized that this project consists of changes to the General Plan and Community Plan and does not include any earth disturbing activities as subsequent discretionary permits will require CEQA review and consultation.

Section 2.1, Aesthetics

No changes were made to this section of the SEIR.

Section 2.2, Agricultural and Forestry Resources

No changes were made to this section of the SEIR.

Section 2.3, Air Quality

No changes were made to this section of the SEIR.

Section 2.4, Biological Resources

- Page 2.4-3, edits to the paragraph at the top of the page have been made, as follows:
This proposed Project consists of changes to the land use designations over 71,700 acres of land which support special status plant and wildlife species. Similar to the 2011 General Plan, the project would directly or indirectly impact habitats of candidate, sensitive, or special status species. The General Plan Update PEIR included a discussion of each vegetation community in the unincorporated County and the species supported by each vegetation community in Section 2.4.1.2 of the General Plan Update PEIR. Table 2.4-1 (Habitat Impacts by Vegetation Community) ~~quantifies~~ compares the total number of acres of each vegetation community with the number of acres that could be potentially affected by new development under the proposed Project.....
- Page 2.4-3, edits to the paragraph at the top of the page have been made, as follows:
Figures 2.4-1A and 2.4-1B illustrates the location of the vegetation communities within the Project area boundary and estimates of the vegetation impacts are shown in Figure 2.4-2A and 2.4-2B in addition to Table 2.4-1. Also, community level figures of the estimated vegetation impacts are provided as Figures 2.4-5.1 through 2.4-5.13 (Estimated Vegetation Impacts).
- Page 2.4-5, edits to paragraph #4 have been made, as follows:
Rural lands (RL-20, RL-40 and RL-80) are estimated to have five acres of impact per potential dwelling unit. A 25% impact is identified for areas assigned a RL-20 designation, a 12.5% impact for areas assigned a RL-40 designation and a 6% impact for areas assigned RL-80, based on a five-acre per dwelling unit assumption for lands outside the MSCP Area. Within PAMA, the potential impact is 2.5 acres per dwelling unit.
- Page 2.4-5 to 2.4-6, a new paragraph at the bottom of the page has been added, as follows:

Table 2.4-3 (Level of Impact: MSCP Parcels) identifies, by potential level of impact, the number of parcels and acres within the South County, draft North County and in-process East County MSCP. This table shows that of the 53,919 acres within MSCP PAMA and preserves, only 12,547 acres would have any subdivision potential under the proposed Project. Table 2.4-4 (Level of Impact: Parcels Adjacent to Conserved Lands) identifies the potential level of impact to parcels adjacent to conserved lands. This table shows that of the 10,264 acres adjacent to conserved lands and preserves, only 2,628 acres would have any subdivision potential under the proposed Project.

- Page 2.4-8 to 2.4-9, edits to the paragraph at the bottom of the page have been made, as follows:

The proposed Project’s direct, indirect and cumulative impacts would be reduced by the same regulations, implementation programs (2011 General Plan goals/policies) and mitigation measures from the General Plan Update PEIR and repeated in Section 2.4.4.4 below. However, implementation of the mitigation measures listed in Section 2.4.4.4 would not reduce these impacts to below a level of significance. Implementation of the MSCP, County of San Diego ~~While the direct and cumulative impacts within the South County MSCP will be mitigated below a level of significance through implementation of the Subarea Plan and the Biological Mitigation Ordinance will provide for mitigation of the direct and cumulative impacts within the Subarea Plan area (southwestern portion of the county). For the northwestern and eastern portions of the county, the North County and East County MSCP Plans have~~ are not yet adopted. As such, any contribution to the cumulative loss of wildlife corridors in the draft North and East County Plan areas would be cumulatively considerable, even after mitigation has been implemented for individual projects. It should be noted; however, that an interim North and East County MSCP Planning Agreement (dated ~~October 29, 2008~~ May 16, 2014) is in place between the County, the CDFW, and the USFWS. Among other things, this agreement establishes a process to review interim development within the Planning Areas that will help achieve the preliminary conservation objectives and preserve options for establishing a viable reserve system or equivalent long-term conservation measures, but until those MSCP Plans are completed and approved, the proposed Project would result in significant and unavoidable direct, indirect and cumulative impacts on wildlife corridors and nursery sites.

- Pages 2.4-19 to 2.4-20, a column titled “Total Acres” has been added to Table 2.4-1.

Vegetation Categories	Impacted Acres	Total Acres
Forest	2,001	14,221
81100 Mixed Evergreen Forest	507	4,319
81300 Oak Forest	1	24
81310 Coast Live Oak Forest	12	151
81320 Canyon Live Oak Forest	1	10
81340 Black Oak Forest	117	311

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Vegetation Categories	Impacted Acres	Total Acres
84140 Coulter Pine Forest	13	<u>206</u>
84150 Bigcone Spruce (Bigcone Douglas Fir)-Canyon Oak Forest	265	<u>1,720</u>
84230 Sierran Mixed Coniferous Forest	402	<u>2,016</u>
84500 Mixed Oak/Coniferous/Bigcone/Coulter	470	<u>4,138</u>
85100 Jeffrey Pine Forest	213	<u>1,326</u>
Grasslands, Vernal Pools, Meadows, and Other Herb Communities	797	<u>6,254</u>
42000 Valley and Foothill Grassland	87	<u>758</u>
42100 Native Grassland	20	<u>27</u>
42110 Valley Needlegrass Grassland	3	<u>35</u>
42120 Valley Sacaton Grassland	97	<u>289</u>
42200 Non-Native Grassland	98	<u>608</u>
42300 Wildflower Field	1	<u>8</u>
42400 Foothill/Mountain Perennial Grassland	258	<u>2,644</u>
45100 Montane Meadow	6	<u>75</u>
45110 Wet Montane Meadow	92	<u>1,082</u>
45400 Freshwater Seep	54	<u>476</u>
52400 Freshwater Marsh	0	<u>2</u>
18310 Field/Pasture	81	<u>250</u>
Riparian and Bottomland Habitat	458	<u>1,770</u>
13140 Freshwater	49	<u>228</u>
13200 Non-Vegetated Channel, Floodway, Lakeshore Fringe	7	<u>26</u>
61300 Southern Riparian Forest	14	<u>111</u>
61310 Southern Coast Live Oak Riparian Forest	213	<u>784</u>
61330 Southern Cottonwood-willow Riparian Forest	29	<u>207</u>
61510 White Alder Riparian Forest	7	<u>53</u>
62000 Riparian Woodlands	9	<u>31</u>
62400 Southern Sycamore-alder Riparian Woodland	2	<u>22</u>
63300 Southern Riparian Scrub	128	<u>309</u>
Scrub and Chaparral	6,800	<u>32,146</u>
32500 Diegan Coastal Sage Scrub	279	<u>2,610</u>
35200 Sagebrush Scrub	52	<u>447</u>
35210 Big Sagebrush Scrub	32	<u>39</u>
35210 Sagebrush Scrub	52	<u>447</u>
37000 Chaparral	122	<u>757</u>
37120 Southern Mixed Chaparral	1,182	<u>2,768</u>
Vegetation Categories	Impacted Acres	Total Acres
37121 Granitic Southern Mixed Chaparral	1,487	<u>4,330</u>
37122 Mafic Southern Mixed Chaparral	39	<u>120</u>
37130 Northern Mixed Chaparral	766	<u>4,622</u>
37131 Granitic Northern Mixed Chaparral	1,075	<u>7,607</u>
37132 Mafic Northern Mixed Chaparral	77	<u>945</u>
37200 Chamise Chaparral	721	<u>2,613</u>

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Vegetation Categories	Impacted Acres	Total Acres
37210 Granitic Chamise Chaparral	355	<u>1,677</u>
37220 Mafic Chamise Chaparral	16	<u>27</u>
37300 Red Shank Chaparral	83	<u>663</u>
37400 Semi-Desert Chaparral	4	<u>34</u>
37500 Montane Chaparral	15	<u>156</u>
37520 Montane Manzanita Chaparral	5	<u>34</u>
37530 Montane Ceanothus Chaparral	2	<u>27</u>
37540 Montane Scrub Oak Chaparral	14	<u>80</u>
37900 Scrub Oak Chaparral	85	<u>933</u>
37A00 Interior Live Oak Chaparral	3	<u>40</u>
37G00 Coastal Sage-Chaparral Scrub	230	<u>867</u>
37K00 Montane Buckwheat	104	<u>302</u>
Woodland	2,472	<u>14,731</u>
62000 Riparian Woodlands	9	<u>31</u>
62400 Southern Sycamore-alder Riparian Woodland	2	<u>22</u>
63300 Southern Riparian Scrub	128	<u>309</u>
63310 Mule Fat Scrub	0	<u>0</u>
63320 Southern Willow Scrub	11	<u>60</u>
70000 Woodland	2	<u>13</u>
71100 Oak Woodland	0	<u>5</u>
71120 Black Oak Woodland	133	<u>1,346</u>
71160 Coast Live Oak Woodland	12	<u>163</u>
71161 Open Coast Live Oak Woodland	72	<u>447</u>
71162 Dense Coast Live Oak Woodland	902	<u>4,788</u>
71180 Engelmann Oak Woodland	0	<u>0</u>
71181 Open Engelmann Oak Woodland	535	<u>2,889</u>
71182 Dense Engelmann Oak Woodland	154	<u>1,491</u>
77000 Mixed Oak Woodland	490	<u>2,963</u>
78000 Undifferentiated Open Woodland	16	<u>154</u>
79000 Non-Native Woodland	4	<u>37</u>
79100 Eucalyptus Woodland	2	<u>13</u>
Total Vegetation Impact	12,528	<u>69,122</u>

Source: LUEG GIS 2014a

- Page 2.4-22, a new table titled “2.4-3 Level of Impact: MSCP Parcels” has been added:

Level of Impact	Number of Parcels				Acreage			
	SCMSCP	Draft NCMSCP	In-process ECMSCP	Total	SCMSCP	Draft NCMSCP	In-process ECMSCP	Total
<i>No Subdivision Potential</i>								
0.0%	=	1	3	4	=	16.6	97.4	114.1
6.3%	=	24	362	386	=	1,289.2	18,014.3	19,303.5
12.5%	22	5	609	636	305.7	14.7	16,287.2	16,607.6
25.0%	=	=	128	128	=	=	2,114.7	2,114.7
50.0%	=	2	182	184	=	19.9	1,663.7	1,683.6
75.0%	5	4	209	218	109.9	10.3	550.1	670.2
100.0%	=	2	73	75	=	92.0	786.4	878.4
TOTAL	27	38	1,566	1,631	415.6	1,442.6	39,513.8	41,372.1
<i>Additional Subdivision Potential</i>								
6.3%	=	4	31	35	=	549.9	6,647.3	7,197.2
12.5%	=	4	24	28	=	326.6	4,186.9	4,513.5
25.0%	=	=	4	4	=	=	835.9	835.9
TOTAL	0	8	59	67	0.0	876.5	11,670.1	12,546.6

Source: LUEG GIS 2016

- Page 2.4-22, a new table titled “2.4-4 Level of Impact: Parcels Adjacent to Conserved Lands” has been added:

Level of Impact	Parcels	Acreage
<i>No Subdivision Potential</i>		
0.0%	35	1,163
6.3%	109	3,338
12.5%	59	1,688
25.0%	76	404
50.0%	87	757
75.0%	71	136
100.0%	51	150
TOTAL	488	7,636
<i>Additional Subdivision Potential</i>		
6.3%	5	1,113
12.5%	8	1,217
50.0%	5	21
75.0%	4	152
100.0%	13	125
TOTAL	35	2,628

Source: LUEG GIS 2016

- Figures 2.4-2A and 2.4-2B have been amended to include potential impacts to East County in-process MSCP Focused Conservation Areas, along with other conserved lands. In addition, the $\leq 25\%$ impact category has been expanded into two categories: (1) $\leq 12.5\%$ and (2) 25%.
- Figures 2.4-4.1 through 2.4-4.13 have been added that show similar information shown on Figures 2.4-2A and 2.4-2B, but at the community level. In addition, these more detailed maps also show Biological Core Resource Areas and designated wildlife corridors and linkages.

Section 2.5, Cultural Resources

- Page 2.5-14, Mitigation Measure Cul-2.6 has been revised as follows:
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 SB-18 and AB-52 review, while maintaining the confidentiality of sensitive cultural information.

Section 2.6, Hazards and Hazardous Materials

No changes were made to this section of the SEIR.

Section 2.7, Hydrology and Water Quality

No changes were made to this section of the SEIR.

Section 2.8, Land Use

No changes were made to this section of the SEIR.

Section 2.9, Mineral Resources

No changes were made to this section of the SEIR.

Section 2.10, Noise

No changes were made to this section of the SEIR.

Section 2.11, Public Services

No changes were made to this section of the SEIR.

Section 2.12, Recreation

No changes were made to this section of the EIR.

Section 2.13, Transportation and Traffic

No changes were made to this section of the EIR.

Section 2.14, Utilities and Service Systems

No changes were made to this section of the EIR.

Section 2.15, Global Climate Change

- Page 2.15-20, the following has been added to the last paragraph:
The applicable mitigation measure that would implement the policy is shown in brackets at the end of each policy.
- Page 2.15-21, the applicable mitigation measure has been added to the end of each policy as shown below:

Policy COS-10.7: Recycling of Debris. Encourage the installation and operation of construction and demolition (C&D) debris recycling facilities as an accessory use at permitted (or otherwise authorized) mining facilities to increase the supply of available mineral resources. [CC-1.19]

Policy COS-15.1: Design and Construction of New Buildings. Require that new buildings be designed and constructed in accordance with “green building” programs that incorporate techniques and materials that maximize energy efficiency, incorporate the use of sustainable resources and recycled materials, and reduce emissions of GHGs and toxic air contaminants. [CC-1.1]

Policy COS-15.2: Upgrade of Existing Buildings. Promote and, as appropriate, develop standards for the retrofit of existing buildings to incorporate architectural features, heating and cooling, water, energy, and other design elements that improve their environmental sustainability and reduce GHG. [CC-1.9]

Policy COS-15.3: Green Building Programs. Require all new County facilities and the renovation and expansion of existing County buildings to meet identified “green building” programs that demonstrate energy efficiency, energy conservation, and renewable technologies. [CC-1.1, CC-1.16, CC-1.18]

Policy COS 17.1: Reduction of Solid Waste Materials. Reduce greenhouse gas emissions and future landfill capacity needs through reduction, reuse, or recycling of all types of solid waste that is generated. Divert solid waste from landfills in compliance with State law. [CC-1.6, CC-1.17]

Policy COS 17.5: Methane Recapture. Promote efficient methods for methane recapture in landfills and the use of composting facilities and anaerobic digesters and other sustainable strategies to reduce the release of GHG emissions from waste disposal or management sites and to generate additional energy such as electricity. [USS-6-7 in GPU FEIR]

Policy COS-18.2: Energy Generation from Waste. Encourage use of methane sequestration and other sustainable strategies to produce energy and/or reduce GHG emissions from waste disposal or management sites. [CC-1.9]

Policy COS 20.2: GHG Monitoring and Implementation. Establish and maintain a program to monitor GHG emissions attributable to development, transportation, infrastructure, and municipal operations and periodically review the effectiveness of and revise existing programs as necessary to achieve GHG emission reduction objectives. [CC-1.3]

Policy COS 20.4: Public Education. Continue to provide materials and programs that educate and provide technical assistance to the public, development professionals, schools, and other parties regarding the importance and approaches for sustainable development and reduction of GHG emissions. [CC-1.14]

- Page 2.15-25, add the following two sentences to the end of the last paragraph on the page, as follows:

CC-20 requires the County to continue to maintain and monitor inactive solid waste disposal sites to ensure compliance with environmental regulations to minimize GHG emissions. CC-21 requires the County to streamline regulations that encourage the use of alternative energy systems, such as photovoltaics and wind.

Chapter 3.0, Other CEQA Considerations

No changes were made to this section of the EIR.

Chapter 4.0, Project Alternatives

- Page 4-7, for added clarification a title has been added to the table on this page, as follows:
Comparison of Alternatives to the FCI Condition

- Page 4-15, the following has been added to the end of the second paragraph under “City-Centered Alternative:”

Therefore, the County finds it would be infeasible to consider this alternative given the following:

- The high potential for the additional development to result in increased impacts to air quality, traffic, noise and community character in the cities where it is being added; and
- The County does not have any land use jurisdiction in the cities to ensure that the additional development would be approved.

Chapter 6.0, Preparers and Persons Contacted

- Page 6-1, the following were added as County of San Diego SEIR Preparers:
Gregory Kazmer Land Use Environmental Planner
- Page 6-2, the following were added as County of San Diego SEIR Reviewers:
Mary Kopaskie Brown Advance Planning, Chief
Darin Neufeld Land Use Environmental Planning Manager

Gregory Kazmer Land Use Environmental Planner

Chapter 7.0, Mitigation Measures

No changes were made to this section of the EIR.

Appendix F, Greenhouse Gas Emissions Calculations

- Page F-3, Table 3 (SEIR Proposed Project: FCI Lands Build-out Vehicle Miles Traveled Calculation) has been moved from F-14 and reformatted (no change in the data being presented).
- Page F-4, Table 4 (Estimated Build-out Vehicle Miles Traveled in FCI-lands and Unincorporated Area for Proposed Project) has been moved from page F-3 and reformatted (no change in the data being presented).
- Page F-4, Table 5 has been added showing projected fuel consumption for each analysis year (see also below).

Table 5 Annual Fuel Consumption Forecasts - SEIR Proposed Project					
Fuel Type	Percent VMT (EMFAC 2014)	Annual VMT	Gallons per mile or kWh/100 miles	Miles per gallon	Annual Fuel Consumption (Gallons or kWh)
2020					
Diesel	6%	3,486,019	0.1176	9	409,956
Gasoline	92%	51,989,905	0.0431	23	2,240,765
Electric	2%	969,036	29	-	281,020
2030					
Diesel	7%	16,559,288	0.1091	9	1,806,618
Gasoline	84%	209,977,293	0.0280	36	5,879,364
Electric	9%	22,063,614	29	-	6,398,448
2050					
Diesel	7%	33,761,647	0.1107	9	3,737,414
Gasoline	83%	390,044,312	0.0261	38	10,180,157
Electric	10%	44,575,151	29	-	12,926,794
Notes: kWh = kilowatt-hours; VMT = vehicle miles traveled					
Electric fuel consumption is in kWh					
Source: EMFAC2014 and Data compiled by Ascent Environmental, Inc. in 2015					

- Page F-5, Table 6 (Electricity Emission Factors for San Diego Gas & Electric) is a reformatted Table 5, which has been moved from pages F-4 and F-5 (no change in the data being presented).
- Page F-6, Table 7 (Natural Gas Emission Factors for San Diego Gas & Electric) is a reformatted Table 6, which has been moved from page F-5 (no change in the data being presented).
- Page F-7, Table 8 (Housing Units and Population Data) is a reformatted Table 7, which has been moved from page F-6 (no change in the data being presented).