

January 14, 2009

RESPONSES

Mr. Devon Muto
County of San Diego
Department of Planning and Land Use
5201 Ruffin Road, Suite B
San Diego, CA 92123

Subject: Comments on the County of San Diego Draft General Plan Document

Dear Mr. Muto:

Thank you for the opportunity to comment on the County of San Diego Draft General Plan document and associated maps. It is our understanding that this is the first draft document, and that a subsequent draft document will out for public review along with the draft EIR at the latter part of 2009.

The City of Chula Vista's boundaries abut three Planning Areas within the County of San Diego jurisdiction: Otay to the east and south, Jamul/Dulzura to the east and north, and Sweetwater to the north. As such, our review focused on any proposed changes within these three Planning Areas that may result in potential conflicts with the City of Chula Vista General Plan.

On the Otay Circulation Element Map, Heritage Road is shown traversing through the Otay Landfill. This may be a mapping error, as the Heritage Road alignment is at the easterly boundary of the landfill. There is also a red dot on Proctor Valley Road, between the County of San Diego and City of Chula Vista boundary. It is uncertain what this red dot is. Please check and clarify.

On all three Circulation Element maps (Otay, Jamul-Dulzura, and Sweetwater), it appears that there are unconnected road segments within the City of Chula Vista, which should be depicted as connected. Please see the attached adopted Circulation Plan for Eastern Chula Vista, depicting the connected segments within Chula Vista.

Also, please ensure that all appropriate roadways with bike lanes or routes are properly depicted as identified/shown on the SANDAG Regional Bikeway Master Plan.

We appreciate the opportunity to comment on this Draft General Plan document, and also appreciate the assistance of Mr. Eric Lardy in providing maps and answering technical questions. The City of Chula Vista requests notification prior to any and all scheduled public meetings, hearings, and workshops, and availability of draft documents related to

The map will be corrected by realigning the road and removing the dot.

This has been corrected on the map that appears in the draft General Plan.

Bike lanes and routes are shown based on the County's adopted Bicycle Transportation Master Plan, which is coordinated with the SANDAG Plan. However, the SANDAG plan is undergoing an update and, therefore, the County's plan may require some modifications in the near future.

The City is included on all notification lists.

County of San Diego General Plan Update
Chula Vista Comments
January 14, 2009

RESPONSES

Page 2

the County General Plan Update. Please send notices to my attention. If you have any questions regarding the above comments, please contact me at (619) 409-5953.

Sincerely,

Stan Donn, AICP
Senior Planner

Attachment: Chula Vista Circulation Plan – East (Figure 5-13E)

Cc: Gary Halbert, Director of Planning and Building
Marilyn R.F. Pongeggi, Principal Planner
Ed Batchelder, Advance Planning Manager
Kirk Ammerman, Principal Civil Engineer
Frank Rivera, Principal Civil Engineer
Dave Kaplan, Transportation Engineer



City of Encinitas

January 14, 2009

Mr. Bob Citrano
Department of Planning and Land Use
5201 Ruffin Road, Suite B, San Diego, CA 92123

Dear Bob:

The Draft General Plan for the County of San Diego became available on November 14, 2008, beginning a 60-day review and comment period. Based on review of the document, City of Encinitas Planning and Building staff noted several areas of concern associated with the update that should be addressed. Staff comments focus primarily on the San Dieguito Community Planning Area within the County of San Diego jurisdiction.

1. The EIR must analyze the direct and cumulative impacts to the City of Encinitas circulation network. Appropriate mitigation must be identified, including how the mitigation will be implemented and the cost of all mitigation measures. The following roads are of particular concern:
 - Rancho Santa Fe, east to Manchester/Encinitas Blvd intersection
 - Camino del Norte, east to Rancho Santa Fe Road
2. The EIR should identify inconsistencies between the City's and County's planned roadway systems and forecasted volumes. This includes ADT volume disparities between the Proposed Circulation Element Road Network in the County (2030) and the forecasted volumes in the City (2030).
3. The EIR should specify the traffic modeling assumptions (lane and intersection control) made for Rancho Santa Fe Road within the City (carrying capacity).

We look forward to working with your staff to coordinate planning efforts in the vicinity of Encinitas. A copy of this correspondence has been sent to gpupdate.dplu@sdcounty.ca.gov, and mailed to the Department of Planning and Land Use at 5201 Ruffin Road, Suite B, San Diego, CA 92123.

Sincerely,

Mike Strong
Associate Planner
City of Encinitas

- C. Diane S. Langager, Principal Planner, City of Encinitas
Scott Vurbeff, Environmental Coordinator, City of Encinitas
Rob Blough, Traffic Engineer, City of Encinitas
Patrick Murphy, Planning and Building Director, City of Encinitas

RESPONSES

This letter contains comments on the General Plan Update EIR. Comments on the Notice of Preparation for the General Plan Update EIR were due on May 28, 2008. Nevertheless, the County will accommodate these requests to the extent possible.

SAN DIEGO COUNTY
REGIONAL AIRPORT AUTHORITY

P.O. BOX 82776, SAN DIEGO, CA 92138-2776
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RESPONSES

January 13, 2009

Mr Bob Citrano
County of San Diego
Department of Planning & Land Use
5201 Ruffin Road, Suite B
San Diego, CA 92123-1666

RE: SDCRAA comments on County of San Diego Draft General Plan

Dear Mr Citrano:

As the Airport Land Use Commission (ALUC) for San Diego County, the San Diego County Regional Airport Authority (SDCRAA) appreciates the opportunity to provide comments on the draft General Plan proposed for the County of San Diego.

As the draft General Plan indicates, the SDCRAA, acting in its capacity as the ALUC, has adopted six Airport Land Use Compatibility Plans (ALUCPs) which contain land use recommendations within Airport Influence Areas (AIAs) in the vicinity of airports located within the land use jurisdiction of the County of San Diego. State statutes require that, once an ALUC has adopted or amended an ALUCP, a local jurisdiction with land use authority in the applicable AIA must update its general plan and any applicable specific plans and zoning ordinance to be consistent with the ALUCP within 180 days of ALUCP adoption (Cal. Gov. Code §65302.3).

Alternatively, a jurisdiction may overrule all or part of the ALUCP by making and reporting required findings to the ALUC and the California Department of Transportation (Caltrans). If the jurisdiction fails to either make its plans and ordinances consistent with the ALUCP or override the ALUCP, then the jurisdiction is required to submit all land use projects involving property within an airport AIA for which an ALUCP has been adopted to the ALUC for a determination of consistency with the ALUCP (Cal. Pub. Util. Code §21676.5(a)).

The draft General Plan makes the statement within the Airport Hazards section of its Safety Element that, "As part of the General Plan update, the County has brought its land use plans into conformance with the San Diego County Regional Airport Authority's adopted ALUCPs" (page 7-23). However, to date, the County of San Diego has not submitted its General Plan to the SDCRAA, acting in its ALUC capacity, for a determination of consistency of the General Plan with the adopted ALUCPs. Moreover, the Land Use Maps Appendix

To DPLU's knowledge, the draft land use plans are consistent with the ALUCPs. Draft versions of the land use maps were distributed to Airport Authority staff for review early in the process and the maps are available on the DPLU website for additional review. DPLU is now coordinating with the Airport Authority staff to conduct additional reviews. DPLU understands that the Airport Authority Board must ultimately determine whether the General Plan is in conformance with the ALUCPs and that this will not occur until after BOS approval. DPLU remains confident that the plans will be in conformance with the ALUCPs and is committed to working with the Airport Authority to resolve any issues. Therefore, the referenced statement is considered appropriate and will be retained. However, language has also been added to both the General Plan and Implementation Plan to recognize the Airport Authority's purview in this manner. [See Implementation Plan sections 4.1.5 Airports and 6.7.1 Airport Land Use Compatibility]



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contains the caveat that each map is an “example figure only”, subject to discretionary consideration by the County Board of Supervisors.

Thus, the SDCRAA has not been afforded the opportunity to consider whether the General Plan is consistent with the adopted ALUCPs because no such application has been received to effectuate such a determination, nor does the draft General Plan provide finalized land use maps upon which substantive comments can be offered to evaluate consistency with the adopted ALUCPs.

Until such time as official consideration by the SDCRAA as the ALUC has been rendered on the General Plan, it is strongly advised that the aforementioned statement in the Safety Element be excluded from the General Plan. Only the ALUC is empowered by State statute to make such a determination, or, alternatively, the County Board of Supervisors may make the overriding findings to address the matter of required General Plan consistency with the adopted ALUCPs.

Similarly, the Noise Element Goal N-4.9 (page 8-13), should be modified to definitively state that development projects will be forwarded to the ALUC for consideration, unless and until such time as the General Plan has been deemed consistent with the ALUCPs by the ALUC or the County has overruled the ALUCPs.

Of specific concern to the SDCRAA are the proposed noise compatibility guidelines (as presented in Tables N-1 & N-2; pages 8-9 & 8-10). Because of the high degree of correlation necessary between these two tables, it is strongly advised that they be consolidated into a single table so that appropriate standards are keyed to the respective uses. For example, Noise Standard 1 of the latter table should be a footnote keyed to Category A of the former table.

Nonetheless, there are potential inconsistencies in the guidelines table with the adopted ALUCPs noise compatibility criteria. For example, certain residential, lodging, civic, office and retail uses are permitted at Community Noise Equivalent Level decibel thresholds without attenuation, which would be required under the ALUCPs, or these uses are allowed at higher thresholds than are considered compatible by the ALUCPs. Moreover, this singular set of standards by use category does not take into account that ALUCP noise matrices are unique to each airport and thus may yield inconsistencies as applied within the various AIAs under County land use jurisdiction.

A few minor revisions are additionally recommended by the SDCRAA to the draft General Plan. These consist of the following:

- The Airports section in the Mobility Element (page 4-16) should include Ontario International Airport in San Bernardino County as an additional regional service airport, as it serves as an inland reliever to the Los

RESPONSES

See response above.

See response above.

Policy was not changed; however, as indicated above, reference to the Airport Authority’s purview has been added to the text of the document.

The tables have been formatted with the intent that they would be used in conjunction with one another. Staff will attempt to paginate the final adopted General Plan so that tables N-1 and N-2 are on facing pages, rather than back to back as they currently appear.

Text has been added to the Noise Element specifying that additional criteria from ALUCP may apply for projects within an AIA.

Text added.

Angeles International Airport mentioned and is particularly accessible by unincorporated San Diego County residents via the I-15 Corridor.

- The discussion of the relationship of other General Plan Elements to the Noise Element (page 8-2) should include airports along with existing roadways as a noise producer.
- The glossary definition of interior noise levels (page 10-21) should supplement the 45 decibel interior threshold cited with reference to the 50 decibel interior sound level allowed by both the County noise standards within the General Plan and the ALUCPs for certain non-residential projects.

While we appreciate the opportunity to offer comments on the draft County General Plan and look forward to the ALUC consideration of the General Plan, the comments within this letter should not be construed to take the place of a consistency determination by the ALUC, nor are these comments necessarily inclusive of all potential issues of concern. Please contact me at (619) 400-2464 or ssawa@san.org should you have any additional questions.

Sincerely,



Sandi Sawa
Manager, Airport Planning
San Diego County Regional Airport Authority

cc: Amy Gonzalez, SDCRAA, Director, Counsel Services

RESPONSES

Text has been revised to incorporate these changes.

Definition supplemented with reference to 50 decibel threshold.



San Diego Local Agency Formation Commission

Website: www.sdlafco.org

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Vice Chairman

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Devon Muto, Chief of Land Use
County of San Diego
Department of Planning and Land Use
5201 Ruffin Rd, Suite B
San Diego, CA 92123

Members

Dianne Jacob
County Board of
Supervisors

Subject: San Diego LAFCO comments on the County of San Diego's Draft General Plan Update

Donna Frye
Councilmember
City of San Diego

Dear Mr. Muto:

Carl Hilliard
Councilmember
City of Del Mar

Thank you for the opportunity to provide comments on the Draft General Plan Update. As you are aware, LAFCO has legal purview over proposed changes to local governmental boundaries and is responsible for establishing and maintaining the spheres of influence for all public agencies in the County of San Diego. State Law defines a sphere of influence as a plan for the probable physical boundaries and service area of a local agency, as determined by LAFCO (Government Code § 56076). Since spheres are important determinants for shaping logical development patterns, general plan update programs within cities and counties need to be closely coordinated with adopted spheres of influence. It is also important that coordination occur between the County and special district service providers.

Noted

Betty Rexford
Councilmember
City of Poway

Andrew J. Menshek
Padre Dam
Municipal Water District

Andrew L. Vanderlaan
Public Member

Alternate Members

Greg Cox
County Board of
Supervisors

In many cases, the availability of adjacent city services that can support development in the unincorporated territory has encouraged some cities to establish land use plans for higher densities within city spheres than the County of San Diego has planned to accommodate. In other cases, the County has planned for higher densities on the periphery of cities than affected city or special district service providers have anticipated within their existing general plans and master facility plans. This can produce conflicts for the development of plans for an area.

The County recognizes this issue and notes that many plans are outdated and require updates. Additionally, most master facility plans are based on existing adopted plans. Therefore, it is not always reasonable to base future plans for growth on these existing plans.

Brian Maienschein
Councilmember
City of San Diego

Mark Lewis
Mayor
City of El Cajon

John S. Ingalls
Santa Fe
Irrigation District

Therefore, within the development of the framework for the future growth and development of the unincorporated areas of the County of San Diego, it is important for the County's General Plan Update to consider the existing general plans and spheres of influence of the adjacent cities as well as the master plans and spheres of influence of the adjacent and

Noted. See above response.

Harry Mathis
Public Member

Executive Officer

Michael D. Ott

Counsel

William D. Smith

overlapping special district service providers. Close coordination with these local governmental agencies will ensure that the County's General Plan Update and associated Community Plans are in harmony with the long-range plans that affect not only the unincorporated areas, but also the San Diego Region as a whole. Government Code § 56425 (b) requires coordination between the County and municipal service providers in the update of spheres of influence.

After review of the Draft General Plan Update, LAFCO wishes to submit the following comments:

1. As LAFCO is responsible for encouraging orderly growth and development, enabling the provision of housing for families of all incomes, discouraging urban sprawl, preserving open-space and prime agricultural lands, and ensuring the timely and efficient extension of governmental services, it is noted that the Draft General Plan Update's goals, policies, and guiding principles address these important regional topics both specifically and comprehensively.
2. While goals and policies regarding inter-jurisdictional coordination are discussed, there is no mention within the body of the Draft General Plan of either LAFCO's discretionary role in the expansion of incorporated cities and special districts boundaries and service areas, or the need for coordination with the adopted spheres of influence of the cities or special districts.
3. The Draft General Plan Update's glossary definition of LAFCO does not mention the Commission's legal authority to establish and maintain spheres of influence for all local agencies in the county of San Diego and should be corrected to reflect this important discretionary power.
4. Within the goals and policies for the land use element, Policy LU-1.7 (Relationship of County Land Use Designations with Adjoining Jurisdictions) states the County's policy to *"Prohibit the use of established or planned land use patterns in nearby or adjacent jurisdictions as precedent or justification for land use designations of unincorporated County lands."* This policy does not consider Government Code § 56375 (a)(7), which states *"The decision of the Commission (LAFCO) with a regard to annex territory to a city shall be based upon the general plan and rezoning of the city."*
5. Land Use Element Goal LU-4 (Inter-jurisdictional Coordination) states the County's goal to establish *"Coordination with the plans and activities of other agencies that relate to issues such as land use, community character,*

This comment is noted

Additional text has been added to the Regional and Multi-Jurisdictional Plans section of Chapter 1: Introduction.

Specified text has been added to glossary definition.

This policy refers to the designation of land uses prior to an annexation and does not preclude LAFCO from compliance with the Government Code. The intention is to designate land uses based on the objectives and goals of the County's General Plan, until such time as annexation.

RESPONSES

transportation, energy, other infrastructure, public safety, and resource conservation and management in the unincorporated County and the region." While LAFCO is supportive of the intent of the goal, there is no mention within the associated policies of the discretionary role of LAFCO or of the existence of city and special district spheres of influence that include unincorporated territory. It should also be noted that inclusion of territory in a subject city's sphere of influence is a prerequisite of annexation eligibility.

6. As Policy LU-4.5 (Annexations with Incompatible Land Uses) states the County's intent to "*Oppose annexations by neighboring cities that would result in land uses incompatible with unincorporated lands*", it is vital that the County's General Plan Update and associated Community Plans review and consider all adjacent cities' existing spheres of influence in order to avoid the potential for incompatible land use planning within affected unincorporated territory.
7. Because of the limited availability of imported water supply from the County Water Authority (CWA), and the limited availability of other urban services in the unincorporated territory, such as sewer and fire/emergency services, the County's future growth and development should consider and coordinate with the long-range master plans and spheres of influence of the special districts that provide these services to the San Diego Region. While the affected special districts should also coordinate with the County's land use plans, many of these service providers have existing master facility plans that are currently being implemented within their existing service areas. Accordingly, it is incumbent on the County to ensure that adequate levels of existing and proposed services and infrastructure are available or anticipated in order to support sustainable land use planning in the unincorporated areas. The existing spheres of influence of the affected special districts should be acknowledged and noted as a tool for the County to utilize within the process of updating local community plans.

Should you have any questions, or if San Diego LAFCO may be of any further assistance, please contact me at (619) 531-5409.

Sincerely,



ROBERT BARRY
Local Governmental Analyst
RB:tl

A reference to LAFCO has been added to policy LU-4.5.

During the GP Update staff reviewed and considered the land use plans for all adjacent cities' existing spheres of influence; however, independent land use determinations were made for the unincorporated County so that land use designations within SOIs are compatible with the County Land Use Map and associated goals and policies.

These issues have been taken into consideration by the County. As previously mentioned, most master facility plans are based on existing adopted general plans. Therefore, it is impractical to rely on such plans when updating a general plan to accommodate future growth. The draft General Plan does contain policies that require that adequate infrastructure be in place prior to approval of new development.



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January 16, 2009

File Number 7000300

Devon Muto
 County of San Diego
 Department of Planning and Land Use
 5201 Ruffin Road, Suite B
 San Diego, CA 92123

Dear Devon:

SUBJECT: Draft General Plan for the County of San Diego

Thank you for the opportunity to review and comment on the Draft General Plan for the County of San Diego. These comments are based on policies included in the Regional Comprehensive Plan (RCP), the Regional Transportation Plan (RTP), and the Congestion Management Program (CMP), and are submitted from a regional perspective emphasizing the importance of land use and transportation coordination and implementation of smart growth principles.

SANDAG staff commends the County staff on a well-executed, comprehensive Draft General Plan document that demonstrates a clear commitment to smart growth principles. The proposed ten Guiding Principles are consistent with and complement the RCP and RTP.

The County is the largest geographic area and second most populated jurisdiction in the region; therefore, the Draft General Plan plays an important role in the region's future growth and development. As such, SANDAG offers the following comments.

Comments on Land Use Element

A key goal of the RCP is to focus growth in smart growth opportunity areas as identified on the Regional Smart Growth Concept Map (June 2008). The County of San Diego staff identified several Smart Growth Opportunity Areas on the map, including five Rural Villages, three Community Centers, and one Special Use Center. Below is a table showing the RCP recommended land use density and intensity targets for these place types.

Smart Growth Place Type	Minimum Residential Targets	Minimum Employment Targets	Minimum Transit Service Characteristics
Community Center	20+ units/acre	N/A	High Frequency Local Bus
Special Use Center	Optional	50 employees/acre	Light Rail/Rapid Bus
Rural Village	10.9+ units/acre	N/A	N/A

RESPONSES

SGOAs are included in the Housing Element.

RESPONSES

It is suggested that consideration be given to mentioning the Smart Growth Concept Map in the Land Use Element and discussing how the two relate to each other.

Page 3-29, Policy LU 9.3 – Village and Community Core Guidelines and Regulations. It is recommended that minimum densities for new development in village and community cores be considered to support existing and planned transportation improvements. This policy could be linked to the Housing Policy 1.2 (H-1.2), which encourages development intensity of at least 80 percent of the maximum permitted gross density for sites designated at 15 to 30 dwelling units per acre in development projects.

Page 3-30, Policy LU 9.10 – Internal Village Connectivity. SANDAG suggests adding “including pedestrian and bike paths” to the end of the last sentence.

Page 3-38, Policy LU 12.1 – Concurrency of Infrastructure and Services with Development. This policy is an opportunity to specifically name transit-oriented infrastructure (bus stops, bus benches, turnouts, etc.) as a way of encouraging its inclusion in projects.

Page 3-40, Policy LU 18.2 – Co-Location of Civic Uses. To encourage access by all segments of the population, civic uses should be accessible by transit whenever possible.

Comments on Mobility Element

Many of the comments on the Mobility Element were provided in July 2008 as part of the SANDAG review of the preliminary draft.

Please use the phrase “2030 RTP” instead of “2007 update of the SANDAG Regional Transportation Plan, etc.” throughout the entire general plan update for consistency. It is used correctly in the main document but not in the Appendices.

Page 4-4, County Road Network – Context. First paragraph, second sentence: Please add “transit riders” to the sentence “Although motorists are the primary users of the system, transit riders, bicyclists...”

Page 4-6, Road Classifications. Reference is made to the County’s Public Road Standards. The preliminary draft had a table including design speed, average daily traffic (ADT) threshold, right-of-way requirements, etc., and illustrations in addition to the roadway classification descriptions. It is suggested that this be included or added to the Appendices.

Page 4-10, Road Network. The plan should include a description of the Transportation Impact Fee (TIF) Program. This section references the program but does not say what it is.

Page 4-12, Policy M-1.3 – Peripheral Location for High-Volume Roadways. It is suggested the title be changed to “Treatment of High-Volume Roadways,” and the text to read “To reduce adverse impacts and costs, consider narrower rights-of-way and lower design speeds in areas planned for substantial development. Reduce noise, air, and visual impacts of new freeways, regional arterials, and Mobility Element roads, through landscaping, design and/or careful location of facilities.”

DPLU feels that including this in the Housing Element is sufficient.

Revised as recommended.

Added reference to transit-oriented infrastructure.

Text added.

Noted.

Revised.

Text added.

The cross sections and information are being added to the revised County Public Road Standards.

A description of the TIF has been added.

Revised as noted, except starting with an active voice.

RESPONSES

Page 4-13, Table M-3 – Criteria for Accepting a Level of Service EIF. When assessing levels of service, it may be prudent to consider walkability as a reason to allow lower levels of vehicle service. Please consider adding walkability to this table in the “Criteria” column.

Added.

Page 4-16, Rail Facilities. It is recommended that the following text be added for clarification.

The North County Transit District (NCTD) and Metropolitan Transit System (MTS) own and maintain the main rail line along the coast from downtown San Diego to the Orange County border, which is shared between Amtrak intercity, COASTER and Metrolink commuter passenger rail services, and Burlington North Santa Fe (BNSF) Railway freight service. NCTD also owns the rail corridor between Oceanside and Escondido, operating SPRINTER light rail service, and sharing the corridor with BNSF Railway freight service.

Text added.

A freight line, the San Diego & Arizona Eastern Railway’s Desert Line, is the primary rail line that traverses the unincorporated County. Existing rail lines, such as the Desert Line, may be underutilized at their current capacities and the lines must remain economically feasible for continued operation and their usage maximized to provide an alternative to trucks, whenever feasible. In addition, BNSF is the operator of a freight line that runs from Oceanside to Escondido. The Amtrak and COASTER passenger lines run along the coast through Marine Corps Base Camp Pendleton (continue with sentences regarding abandoned rail lines).

Text added.

Since 1996, the California High-Speed Rail Authority (CHSRA) has been the state agency charged with planning, designing, constructing, and operating a statewide high-speed train system. San Diego would be connected to this proposed system via the Interstate 15 corridor, from downtown San Diego to Escondido, Riverside County, and Los Angeles. A programmatic environmental impact report/environmental impact statement (PEIR/EIS) was certified in 2005 and planning work continues on the corridor.

Text added.

Page 4-17. Policy M-5.3 from the preliminary draft Mobility Element relating to “requiring new development to have site design and on-site amenities for alternative modes of travel, etc.” has been removed. It is recommended that this policy be included in addition to previously suggested wording modifications relating to transit.

Much of the requirements for this policy are included in policy M-10.1. Text relating to transit and bicycle facilities has been added.

Pages 4-19 to 4-21, Public Transit. It is suggested that this plan include a policy with language that supports transit in terms of aiding in the provision of right-of-way, capital facilities, and funding where appropriate and in cooperation with SANDAG, NCTD, and MTS.

Policy M-8.1 amended to incorporate recommendations.

It is recognized that the unincorporated area encompasses a vast land area that cannot efficiently be served by public transit; therefore, to serve the region’s mobility needs, it is recommended that new development be directed to areas that can be served to the extent possible. To address this, it is suggested that the County consider a policy that directs the most growth toward village areas that are closer to the region’s urban core, such as Spring Valley, Valle de Oro, or Lakeside.

Noted.

Transit is potential user of all roadways from Prime Arterial to Minor Collector. If transit service was desired, bus bays (turn outs) would likely be required on roads with speed limits higher than 40 mph. It is suggested that this be accounted for in road classifications discussed in the Mobility Element, and in any current or future road cross-sections that may be shown in the plan.

Text has been amended to discuss bus turn-outs.

RESPONSES

It is suggested that all Mobility Element maps show regional transit facilities when possible, including maps in the Appendices.

It is suggested that new development include provisions for bus transit including, but not limited to, shelters, benches, boarding pads, and/or trash cans in coordination with NCTD and MTS, as appropriate (see comments on Page 4-17 – Policy M-5.3 above).

Page 4-19, last paragraph. With the passage of State law (SB 1703), SANDAG is now ~~became the Consolidated Transportation Service Agency (CTSA) in January 1, 2003,~~ responsible for transit planning...

Page 4-20, fourth paragraph. Existing transit service for the unincorporated County consists of limited regional, or local bus service, and heavy-light rail (the NCTD ~~Sprinter~~ SPRINTER) to the larger...

Page 4-20, fifth paragraph. SANDAG has the responsibility to designate the local Consolidated Transportation Service Agency (CTSA).

Page 4-21, Policy M-8.1 – Transit Service for Transit-Dependent Populations. Coordinate with SANDAG, the CTSA, and ~~mass transit agencies~~ NCTD, and MTS to:

Page 4-21, Policy M-8.3 – Transit Stops That Facilitate Ridership. Work with SANDAG, NCTD, and MTS to locate transit stops and facilities...

Page 4-21, Policy M-8.4 – Transit Amenities. Please clarify the entity responsible for maintaining stops and shelters.

Page 4-23, Parking – last paragraph. Consider rewording this statement – “Providing an ample supply of free parking supports an auto-oriented society, while downplaying transit, walkability, and safety” to read “Large amounts of free parking discourage transit and can negatively affect walkability and safety by promoting an auto-oriented community.” In the context of the paragraph, the former wording does not appear to emphasize the disadvantage.

Page 4-22, Transportation System Management. To encourage mobility, the focus should be on moving people and goods, not vehicles and goods. Please revise.

Pages 4-25 to 4-29, Bicycle, Pedestrian, and Pedestrian Facilities. The typical road cross-section should show bicycle facilities. In addition, road cross-sections should account for setting, i.e., bicyclists may be able to use the road shoulder in a rural setting, but shoulders may be inadequate in a more urban setting due to on-street parking.

Page 4-25. In the second paragraph, the first sentence should read that “SANDAG is in the process of developing a regional bicycle plan update...”

Page 4-27, Figure M-2. As an update to the Regional Bike Plan (RBP) is currently in progress, SANDAG would like to work with County staff to ensure that this map (as well as the maps and tables in the Appendices) reflects the RBP map. Please contact Chris Kluth at (619) 699-1952, or ckl@sandag.org, for the latest RBP maps and information.

Noted.

Policy M-8.5 amended to incorporate recommendations.

Revised.

Revised.

Revised.

Revised.

Revised.

DPLU does not concur with including the maintenance entity (which is typically transit agencies) in this policy.

Revised.

Revised.

Cross section will be provided in the revised County Public Road Standards.

Revised.

Figure M-2 is based on the County Bicycle Transportation Plan as adopted by the Board of Supervisors. Staff will coordinate with SANDAG for future updates to this plan.

Page 4-30, Level of Service. In the last paragraph, it should be noted that there is a difference in level of service (LOS) threshold between the County and the CMP. In cases where the County has a lower LOS, this does not negate the CMP requirement for deficiency plans where the LOS is lower than LOS E.

Comments on Conservation Element

Page 5-29, Air Quality. The first sentence of the fourth paragraph states "Transportation is California's largest source of carbon dioxide, with passenger vehicles and light duty trucks creating more than 30 percent of total climate change emissions (footnote 12)."

In September 2008, the University of San Diego (USD) published a San Diego countywide greenhouse gas inventory that identifies 46 percent of total regional climate change emissions from on-road vehicles. It is suggested that the County use regional rather than statewide data. SANDAG is using the USD data for its Regional Climate Action Plan to be published in 2009. Please contact Susan Freedman at (619) 699-7387, or sfr@sandag.gov, for additional information.

Conclusion

We appreciate the opportunity to comment on this project. If you have any questions or concerns regarding my comments on this project, please contact me at (619) 699-1944, or ccl@sandag.org.

Sincerely,



COLEEN CLEMENTSON
Principal Regional Planner

TCL/mwo

RESPONSES

Text added.

Passenger vehicles and light duty trucks are a portion of on-road vehicles, which is the reason that the 30 percent is a substantial amount less than the 46 percent. Nevertheless, the percentage was changed and USD reference used.



Thomas G. Acuna, AICP
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San Diego, CA 92123-1548
(T) 858-637-3701

RESPONSES

Devon Muto, Chief
County of San Diego
Department of Planning and Land Use
5201 Ruffin Road
Suite B
San Diego, CA 92123

Subject: General Plan Update Comments/ SDG&E

Dear Mr. Muto,

The purpose of this letter is to provide the County with suggested changes for its General Plan. More specifically, we suggest changes to the draft language of Chapter 5 of "Conservation and Open Space Element". We are hopeful that our suggested changes will help guide the County of San Diego with an energy policy that promotes the personal welfare of its citizens, adds economic vitality, and sustains or improves the sensible use of resources.

SDG&E provides the following recommendations in a format that fits the County's existing format. Specifically, our comments address the following elements:

Energy & Sustainable Development

(Replace 1st paragraph with the following two paragraphs, page 5-31)

SDG&E is a regulated public utility that provides electric service to 3.4 million customers within a 4,100-square-mile service area that encompasses 25 cities throughout San Diego and southern Orange counties.

In 2003, the three key energy agencies in California - the California Energy Commission (CEC), the California Power Authority (CPA), and the California Public Utilities Commission (CPUC), came together to adopt an Energy Action Plan that identifies joint goals for California's energy future and sets forth a commitment to achieve these goals through specific actions.

In 2005, the CEC and the CPUC adopted a second plan, Energy Action Plan II, to reflect policy changes and actions that had ensued over the previous two years.

In 2008, an Energy Action Plan Status Update was released to incorporate the CEC's 2007 Integrated Energy Policy Report (IEPR), reflecting the passage of Assembly Bill 32, the California Global Warming Solutions Act of 2006. The IEPR includes advanced policies, intended to enable California to meet its energy needs in a carbon-constrained world. The report also provides a comprehensive set of recommended actions to achieve these policies. SDG&E's Long-Term Resource Plan (LTRP) sets forth a strategy of mixed resources to ensure long-term, reliable, and affordable power in the region, as established by the CPUC in Decisions D.04-09-060 and D.05-09-043. The CPUC regulates energy issues related to supply, delivery, rates, and tariffs for all SDG&E customers in the County.

Text revised accordingly.

RESPONSES

With regard to adding modifying, operating, increasing, or adding new energy infrastructure, SDG&E follows the rules and regulations of California Public Utilities Commission, California Independent System Operators, California Energy Commission, and the Federal Department of Energy.

Goals and Policies

(Insert two new policies to "Sustainable Land Development", page 5-33)

COS-14.14 Existing Energy Corridors. Senate Bill 2431 (SB 2431, Stats. 1988, Ch.1457) promoted state policy for efficient energy delivery and the construction of high voltage delivery. Where possible, the County supports the following:

- a. The County finds and declares that establishing a high-voltage electricity transmission system capable of facilitating bulk transactions for both firm and non-firm energy demand, accommodating the development of alternative power supplies within the state, ensuring access to regions outside the state having surplus power available, and reliably and efficiently supplying existing and projected load growth, are vital to the future economic and social well being of California.*
- b. The County finds and declares that the construction of new high-voltage transmission lines within new rights-of-way may impose financial hardships and adverse environmental impacts on the state and its residents, so that it is in the interests of the state, through existing licensing processes, to accomplish all of the following:*
 - 1. Encourage the use of existing rights-of-way by upgrading existing transmission facilities where technically and economically justifiable.*
 - 2. When construction of new transmission lines is required, encourage expansion of existing right-of-way, when technically and economically feasible.*
 - 3. Provide for the creation of new rights-of-way when justified by environmental, technical, or economic reasons as determined by the appropriate licensing agency.*
 - 4. Where there is a need to construct additional transmission capacity, seek agreement among all interested utilities on the efficient use of that capacity.*

COS-14.15 State & Federal Designated Energy Corridors. The California Energy Commission and the Federal Department of Energy have regulatory responsibilities to improve transmission access to and throughout California. These responsibilities are mandated through AB 1059 and Section 368 of the National Energy Act of 2005. The County supports these regional and national efforts.

The County does not agree that the recommended policies should be added to the General Plan Update. The suggested policies are broad statements that would have little direction of the specific actions of the County. Sufficient policies are already contained in the Draft General Plan Update relating to the siting and development of infrastructure.

Thank you for allowing SDG&E this opportunity to comment. Should you wish to discuss these recommendations further, please don't hesitate to contact me.

Sincerely,



Tom G. Acuna
SDG&E Land Planning Supervisor

Summary of Senate Bill 2431 (SB 2431, Stats. 1988, Ch. 1457)**Electric Utility Transmission Line Rights-of-Way Study**

Transmission congestion and electricity reliability problems have traditionally been met by expansion of the electrical transmission system. Obtaining permission to expand existing transmission rights-of-way or siting new transmission rights-of-way has been and continues to be a very difficult and controversial process. There are numerous entities (e.g., investor-owned utilities, independent power developers, transmission-dependent utilities, and transmission-owning utilities) involved in transmission planning, all with varying needs. The Legislature, in an effort to avoid single-purpose transmission lines where possible and facilitate effective coordinated long-term transmission line corridor planning, approved Senate Bill 2431 (SB 2431, Stats. 1988, Ch. 1457) which required a number of studies to be prepared and included in the Energy Commission's 1990 Electricity Report. The bill also made two general findings concerning the role of transmission in California's future development:

- a. The Legislature hereby finds and declares that establishing a high-voltage electricity transmission system capable of facilitating bulk transactions for both firm and nonfirm energy demand, accommodating the development of alternative power supplies within the state, ensuring access to regions outside the state having surplus power available, and reliably and efficiently supplying existing and projected load growth, are vital to the future economic and social well being of California.
- b. The Legislature further finds and declares that the construction of new high-voltage transmission lines within new rights-of-way may impose financial hardships and adverse environmental impacts on the state and its residents, so that it is in the interests of the state, through existing licensing processes, to accomplish all of the following:
 1. Encourage the use of existing rights-of-way by upgrading existing transmission facilities where technically and economically justifiable.
 2. When construction of new transmission lines is required, encourage expansion of existing right-of-way, when technically and economically feasible.
 3. Provide for the creation of new rights-of-way when justified by environmental, technical, or economic reasons as determined by the appropriate licensing agency.
 4. Where there is a need to construct additional transmission capacity, seek agreement among all interested utilities on the efficient use of that capacity.

Neither the need for transmission expansion nor the controversies surrounding expansion have diminished since the Legislature's transmission corridor siting findings were made. The Energy Commission believes that these principles are still important today and must be considered when planning for the expansion of transmission corridors.



SWEETWATER AUTHORITY

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MARGARET COOK WELSH

RESPONSES

January 14, 2009

MARK N. ROGERS
GENERAL MANAGER
JAMES L. SMYTH
OPERATIONS MANAGER

Mr. Devon Muto
Chief, Advanced Planning
County of San Diego
Department of Planning and Land Use
5201 Ruffin Road, Suite B
San Diego, CA 92123-1666

Subject: GENERAL PLAN UPDATE – DRAFT GENERAL PLAN

Dear Mr. Muto:

This is in response to your request for Sweetwater Authority's input during the review period for the General Plan Update. Our comments pertain specifically to the draft Goals and Policies for the Conservation and Open Space Element.

Biological Resources

- We do not believe that the draft Goals and Policies for Biological Resources would adversely affect Sweetwater Authority's land ownerships or operations.

Water Resources

- Goal COS-4, Water Management: We recommend that you include a policy stating the importance of maximizing local water sources, such as brackish water and ocean water desalination. Suggested language for this policy is: *Maximize the use of local brackish and saltwater supplies by encouraging the use of reverse osmosis or other desalination technologies, coupled with effective and environmentally sound brine disposal.*
- Policy COS-4.2, Drought-efficient Landscaping: Please expand this policy to include information contained in the San Diego County Water Authority's conservation programs for outdoor water use, which have been highly effective in achieving water conservation savings.
- Policy COS-5.5, Impacts of Development: We recommend revisions to this draft policy, as follows: *Require development projects to avoid impacts to the water quality in local reservoirs, watersheds, and other local water sources.*

Noted.

COS-4 - Concur that this is important and we have addressed it on page 3-34 of the Land Use Element. Although staff agrees with this concept, we do not feel it should be a policy in the GP, as the County is not a purveyor of surface water.

COS-4.2 - DPLU does not agree adding additional detail into a General Plan policy. The suggestion is appreciated and the County is committed to investigating additional conservation programs in the Implementation Plan. Water conservation is also addressed in the Air Quality, Climate Change, and Energy sections under Goal COS-19. Text was revised to note this.

COS-5.5 - Revised as recommended.

RECEIVED
JAN 20 2009

Background

Sweetwater Authority is a public water agency in the South Bay area of San Diego County serving approximately 184,900 people residing in the City of National City, the western portion of the City of Chula Vista, and the unincorporated community of Bonita. Sweetwater operates Sweetwater Reservoir and Loveland Reservoir to store local and imported water for its customers and utilizes water pumped from deep freshwater wells and brackish water wells. Water treated at the Robert A. Perdue Water Treatment Plant in Spring Valley and the Richard A. Reynolds Groundwater Desalination Facility in Chula Vista is provided to Sweetwater's customers via the adjacent water distribution system.

Noted.

Sweetwater Authority is deeply involved in programs to protect its water sources and continually investigates ways to increase local supplies of water. Programs include urban runoff diversion and treatment, studies of aquifer storage, and watershed outreach and education. Sweetwater has coordinated with County planners to track land development in the Sweetwater River Watershed for nearly 30 years. Sweetwater Authority Resolution 84-8, approved by the Board of Supervisors in 1985 and later amended by Sweetwater's Governing Board as Resolution 88-5, established the policy regarding urban runoff protection for Sweetwater Reservoir. Since the Board of Supervisors action, discretionary project approvals within a designated area of the Sweetwater Reservoir watershed have complied with this resolution, which provides for the collection of urban runoff protection fees from all developments within the lower Sweetwater Reservoir drainage basin to pay for a portion of the Sweetwater Reservoir Urban Runoff Diversion System.

Noted.

We appreciate the opportunity to comment on the General Plan Update. If you have any questions, please contact Jane Davies at (619) 409-6816 or jdavies@sweetwater.org.

Sincerely,
SWEETWATER AUTHORITY



Rick Alexander
Director of Environmental and Governmental Services

pc: James L. Smyth, Sweetwater Authority
Jack Adam, Sweetwater Authority
Don Thomson, Sweetwater Authority



City of Vista

RESPONSES

January 21, 2009

Devon Muto, Chief
Department of Planning and Land Use
County of San Diego
5201 Ruffin Road, Suite B
San Diego, CA 92123-1666

R E C E I V E D
JAN 23 2009

DPLU - PPCC

Dear Mr. Muto:

Thank you for the opportunity to comment on the County's General Plan Update document. We have reviewed the draft document provided to us on November 19, 2008 in CD-format and have four comments. Those comments are as follows:

Land Use

1. Though we realize that final land uses are yet to be voted on by the Board of Supervisors, the designation of VR-4.3 on the properties north and west of Ridge Road remain a concern. This area, known as the Sunset Island and covered by the North County Metro Community Plan, is proposed for density more than four times what has been planned for by the City. We are aware that sewer and other infrastructure is generally accessible to the area. However, neither the Vista Sanitation District, nor the Planning Division, was ever consulted about the assumption that we would be able to serve the increase in housing units. The proposed increase of over 500 dwelling units would likely result in a fiscal deficit to the City, and pose a threat to our sewer treatment capacity. As you may know, we too, are in the process of a comprehensive update to our General Plan and this area is not where we are likely to propose increased density. Our concentrations of density are in areas more proximate to public transit and services, whereas the county's proposal is at best, growth inducing. In keeping with principles of smart growth, the City will protect its available treatment capacity in order to serve those units which do not adversely impact the areas of our City where we feel densification is more appropriate.

Mobility

2. We believe that the designation given to the road segment depicted as Mobility Element ID #2, Mar Vista Drive from Cannon Road (Oceanside) to Mar Vista Drive in Vista, is inadequate. This segment connects a 4-lane Major (Cannon Road) and a state highway interchange in Vista. According to 2030 volumes projected with the update of SANDAG's Series 11 Combined North County Model (CNCM), this segment of Mar Vista Drive is anticipated to carry average daily traffic volumes in excess of 17,500. While we understand that these volumes were possibly based on land uses which may differ slightly from what the Board approves, we assume that County staff worked

Land Use. The designation for this area will be reevaluated prior to bringing the project forward to the Board of Supervisors for consideration.

Mobility. The County worked closely with SANDAG to develop a County-specific traffic model calibrated based on existing conditions. The traffic modeling forecasted 10.3K – 12.3K average daily trips (ADT) on the segment of Mar Vista Drive from Cannon Road to SR-78, resulting in a LOS D/E. The request for a 2.2B classification will be considered prior to bringing the project forward to the Board for consideration.

RESPONSES

closely with SANDAG to produce a reasonably realistic traffic model for the North County cities. The projected volumes, combined with the existing road and development characteristics; i.e., nearly every lot has individual access onto Mar Vista and there are very few actual road intersections, makes the proposed 2-lane travel way with left turn pockets at the intersections, inadequate. We feel that a 2-lane section with continuous center left turn lane should be the minimum improvement for public health and safety.

3. Conversely, the designation of Monte Vista Drive from Buena Creek Road to the Vista city limit as a 4.1B Major (ID#4), is excessive. The CNCM has projected volumes of 15,600 vehicles per day for Monte Vista between Foothill Drive and Buena Creek Road and the volumes drop dramatically west of Foothill to less than 5,000 vehicles per day. We believe that a designation of Community Collector 2.1D, two lanes with the optional passing lane, is more appropriate and will transition more smoothly to the segment within the City's jurisdiction.
4. Finally, while we support the 2-lane concept of Foothill Drive (2.2D Light Collector, ID #3), we do not support the proposed cross section shown on Page 17 of the GP2020 Circulation Element Framework. Foothill Drive is one of the roads valued by Vista residents as evidence of the City's rural heritage, and in connection with our own Circulation Element update, we are working on a section which would include a combined bike and pedestrian path, separated from the roadway. We request an opportunity to work with the County on developing the County's section of the road similarly.

Again, thank you for the opportunity to comment on the update. We look forward to the opportunity to resolve these issues of joint concern. Congratulations on your achievements to date in completing this very complex and difficult task.

Sincerely,



Vicki Parker
Principal Planner

/vp

cc: John Conley, Community Development Director
Husam Hasenin, Principal Engineer
Art Brown, Transportation Operations Manager

Noted. The traffic modeling forecasted 19.0K ADT for Monte Vista Drive east of Foothill Drive and 7.9K ADTs west of Foothill. DPLU will consider changing to a 2.1D Community Collector with Improvement Options classification prior to bringing the project forward to the Board for consideration.

As stated in Draft General Plan policy M-4.6, the County will coordinate so that roads that cross jurisdictional boundaries are designed consistent cross-section and capacity. The 2.2D classification should provide sufficient right-of-way to construct a road with separate bike and pedestrian path.



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January 13, 2009

Mr. Devon Muto, Chief
Department of Planning and Land Use
County of San Diego
5201 Ruffin Road, Suite B
San Diego, CA 92123

Subject: General Plan Update
Comments on Draft General Plan

Dear Mr. Muto:

In reviewing the Draft General Plan documents made available on the County’s web site, the Vista Irrigation District (District) offers the following comments:

1. On Figure M-A-14, entitled “North Mountain Mobility Element Network”, a new road appears to be proposed heading north from the intersection of S-2/S-22 to the unlabeled Camino San Ignacio. This alignment crosses lands owned by the District that are not open to or accessible by the public, and which are presently used for cattle grazing. While the District and its lessees make incidental use of an existing dirt road along this general alignment, no public access exists or is proposed in this area. Preliminary conversations with Planner Eric Lardy in your offices indicate that this proposed route may be in error. If so, please remove it from future editions of this map. Otherwise, please provide more information about the need for and nature of this proposed new road, as it appears to significantly interfere with the District’s property rights.
2. The District notes that the land use designation for its property holdings in the Warner Valley (collectively referred to as the Warner Ranch, and comprising about 43,000 acres) is proposed to be changed from “Public/Semi-Public Lands” in the existing General Plan to “Open Space (Conservation)” in the new General Plan (see Figure LU-A-14). This change, with significant land use implications, has been proposed without consultation with the District. The District is in the process of coordinating with the East County MSCP, but has not completed an evaluation of its land use plans at this time. There are currently no conservation easements on the Warner Ranch, and the District’s Board of Directors has taken no action to dedicate any of its holdings as open space. In light of the District’s status as an independent special governmental district, and in view of the present state of our land use planning on the Warner Ranch, we suggest that “Public/Semi-Public Lands” designation remains more appropriate at the present time. In

Board of Directors

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Administrative Staff

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General Manager
Eldon L. Boone
Assistant General Manager / Treasurer
Lisa R. Soto
Board Secretary



DPLU - PPCC

RESPONSES

Correct, this is an erroneous line on the map, and it will be removed.

The County appreciates the District’s concerns. It was not the County’s intent to place restrictions on the District’s land, rather the proposed designation was intended to represent the current use. Staff agrees that the Open Space designation is misleading and will modify the maps prior to bringing the project forward to the Board for consideration.

Mr. Devon Muto
January 13, 2009
Page 2 of 2

RESPONSES

this regard, we would appreciate meeting with your staff to better understand the motivations underlying County staff's proposed change in the land use designation for the Warner Ranch.

The District appreciates this opportunity to comment on the County's Draft General Plan. If you have any questions regarding these matters, please contact Don Smith, Director of Water Resources, at (760) 597-3168, or email him at dsmith@vid-h2o.org.

Very truly yours,



Roy A. Coox
General Manager

cc: Board of Directors
General Counsel
Don A. Smith