

The California Chaparral Institute

...the voice of the chaparral
P.O. Box 545
Escondido, CA 92033

RESPONSES

January 16, 2009

Devon Muto
Dept. of Planning and Land Use
5201 Ruffin Rd., Suite B
San Diego, CA 92123

RE: San Diego County Draft General Plan

Dear Mr. Muto,

We have a remarkable opportunity to establish a plan for the future of San Diego County that can serve as a model for the rest of California *if* we affirm the fact that conservation of natural resources and the preservation of open space are on equal footing with all the other elements in the General Plan. Unfortunately, this is not the case with the current Draft.

The Draft speaks of “balancing” conservation and open space protection with “future growth and development” (LU-6). This is the same perspective that has led to the destruction of the County’s vernal pools, the loss of endangered coastal sage scrub habitat, and the degradation of the chaparral ecosystem through attempts to reduce fire risk. The term “balance” guarantees that the natural environment will continue to disappear as development continues to consume more of the County’s open space.

Instead of speaking in terms of balance, the Plan needs to clearly state that development must be consistent with the “sustainability” of native ecosystems. We must insure that whatever development occurs in the future, it is done in a manner that is the least impactful to both the human and natural environments. We no longer have the luxury of thinking our wildlands are unlimited. The “sustainability” of native ecosystems and the preservation of open space must be a major guiding principle of the General Plan, not the desire to accommodate development at the expense of natural resources.

The way in which the Draft addresses Fire Hazards also needs improvement. We strongly suggest that the General Plan use SB 1595 (Kehoe) as a model for how defensible space and fuel is addressed. The current Draft language concerning Fuel Management beyond the defensible space zone (Pg. 7-7) appears to be based on outdated perspectives and should be changed. There is inadequate evidence that reducing vegetation beyond the defensible space zone will “improve the survivability of structures.” In fact, there is ample evidence that most homes ignite due to windblown embers that can travel up to 2 miles ahead of the fire front. Conducting vegetation

The County appreciates your comments and agrees with the importance of this plan.

The County appreciates your comment and believes that Policy S 3.1 (defensible development) and S 4.1 (Fuel Management Programs) address your concerns.

RESPONSES

management activities in an attempt to reduce such risk would involve the elimination of huge areas of native landscape. Such an approach is not an effective or productive way to approach fire risk reduction. The best way to do so is to focus on the wildland/urban interface (WUI).

Finally, the General Plan needs to offer a definitive goal that an adequately funded, coordinated fire protection system of some kind needs to be developed in San Diego County, preferably a County fire department. The need for such a coordinated fire protection system is acknowledged several times in the Draft.

Thank you for the opportunity to comment on the Draft document. We look forward to working with you and the County to help develop a model General Plan.

Sincerely,

Richard W. Halsey
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760-822-0029

The County is not proposing landscape level clearing or burning in the backcountry in this document. To clarify this point, "Fuel Management" on page 7-7 will be replaced with "Strategic Vegetation Management."

The County appreciates your comment and believes Goal S-5 and Policies S.1 and S.2 address your concerns.



December 3, 2008

Mr. Eric Gibson, Director
County of San Diego - DPLU
5201 Ruffin Road, Suite B
San Diego, CA 92123-1666

Re: County of San Diego General Plan Update – Land Use and Conservation Elements as they relate to Mineral Resources

Dear Mr. Gibson,

The San Diego Chapter of the California Construction and Industrial Materials Association (CalCIMA) has recently reviewed San Diego County's General Plan update as it relates to Mineral Resources, and we offer our comments in this letter. CalCIMA is the statewide trade association for aggregate, ready mixed concrete, and industrial minerals in California, including producers in San Diego County. There are over 100 member companies in CalCIMA, representing over 500 production facilities.

Noted

The California Surface Mining and Reclamation Act (SMARA) was adopted in 1975 to emphasize conservation of mineral resources and insure environmental protection and reclamation of mined lands. These goals are further described in SMARA and subsequent regulations that identify the responsibilities of state and local government, as well as the mining industry. Since the adoption of SMARA, the reclamation and environmental protection aspects of the law have become increasingly stringent; however, resource conservation objectives have been largely neglected. This has led to growing shortfalls in mineral resource availability across the state. This shortage is particularly noteworthy in San Diego County.

Noted

Based on our review, the County of San Diego's Draft General Plan Update does not appear to comply with the mineral resource conservation policies outlined in SMARA. This letter is intended to help the County of San Diego (County) and clarify what we understand the mission of SMARA as it relates to protecting access to mineral resources.

Noted

As our communities continue to grow, the demand for mineral resources also increases. Without thoughtful planning, competing land uses can be established that will eliminate the potential to recover mineral resources. It is our desire to assist the County with developing mineral resource policies that satisfy SMARA requirements; thereby ensuring a sustainable supply of construction aggregate. SMARA's requirements are also summarized in the office of planning and research's 2003 General Plan Guidelines, pages 176-180.

Noted

While not entirely relevant to a General Plan process, we would also like to note that designated mineral resources were included in SB 375 (Steinberg) for inclusion in the Sustainable Communities Strategy. Likewise, SANDAG is pursuing a comprehensive San Diego County Aggregate Supply Study with the assistance of CalTrans grants. Preserving our communities vital natural mineral resources is critical to our future ability to provide the basic building materials necessary to maintain and develop San Diego's infrastructure in the most environmental, economic and socially sustainable fashion. As such, preserving those resources in a comprehensive planning document such as the general plan is critical.

Noted

Background

SMARA has two primary objectives:

1. Protection of the environment and public health and safety; and
2. Conservation of mineral resources to ensure availability for future production.

SMARA requires all lead agencies, including the County of San Diego, to establish goals and policies within their General Plans that will accomplish these two goals. While most lead agencies satisfy the first objective, they fall short of developing policies that protect areas containing mineral resources for future development. As a result, all areas of the State are experiencing a severe shortage of construction aggregate resources and San Diego County is no exception.

Noted

Currently San Diego County producers are only able to meet half of the county's construction aggregate consumption needs. According to Susan Kohler¹, senior geologist with the California Geological Survey, permitted aggregate reserves in Western San Diego County are being depleted rapidly. According to Kohler, permitted reserves dropped from 275 million tons in 2001 to 198 million tons in 2006; a 28 percent reduction in five years. Additionally, the number of active mining operations is expected to decrease by 50% in the next 5 to 10 years.

Noted

Noted

The construction aggregate shortage has led to the need to import as much as half of the aggregate used in San Diego County. Mexico and neighboring counties are the source of these aggregates. The source of aggregate supplies that lie outside of the County are found at distances exceeding 90 miles from their point of destination.

¹ Kohler, Susan L., "Aggregate Availability in California". California Geological Survey, Map Sheet 52. December 2006.

This results in a cause and effect relationship within our region, resulting in increased greenhouse gas emissions, criteria pollutant emissions, increased congestion on area freeways, and increased cost for aggregates.

Noted

With a growing need for construction aggregate within the County, it is important for the General Plan Update to implement effective land use planning to ensure future supplies of construction aggregate resources are available within the market area. This will result in lower environmental externalities and costs for all aggregate products.

Noted

Conservation/Open Space Element - Mineral Resources Section

In order to allow planning for conservation and access to mineral resources, the SMARA statutes initiated the mineral land classification program. This program is designed to identify lands containing construction aggregate quality resources so lead agencies can incorporate these lands in their local land use planning process. In 1982, and further updated in 1996, the Department of Conservation conducted a mineral resource classification of San Diego County where several areas of the County that contain high quality aggregate resources were identified. Many of these areas are contained within the County of San Diego's jurisdiction. Following adoption of these reports, lead agencies are required to establish mineral resource management policies that protect these resources.

Noted

SMARA Section 2762(a)

"Within 12 months of receiving mineral information, and also within 12 months of the designation of an area of statewide or regional significance within its jurisdiction, every lead agency shall, in accordance with state policy, establish mineral resource management policies, to be incorporated in its general plan"

SMARA also provides guidance to lead agencies as to what needs to be contained in the General Plan. The 2003 OPR General Plan guidelines summarize the SMARA requirements which are found in the California Code of Regulations, Title 14, Division 2, Chapter 8, subchapter 1. Specifically, Section 3676 states that each General Plan should contain the following:

1. A summary of the mineral classification study, i.e. by reference or maps of the identified mineral deposits;
2. Statements of policy as required in SMARA Section 2762.(a)
 - i. Acknowledge the information provided by the State Geologist (Classified and or Designated) regarding the extent of mineral resources within the jurisdiction.
 - ii. Coordinate the management of land uses within and surrounding areas of statewide and regional significance to restrict the encroachment of incompatible uses.

Noted

Noted

iii. Emphasize the conservation and development of identified mineral deposits.

3. Implementation measures that:

Noted

- Discuss the location of identified mineral deposits and distinguish which are designated for conservation and for future extraction.
- Maps clearly defining classified mineral deposits, including those resources designated for conservation and future extraction.
- Include at least one of the following:
 - i. Use of special purpose overlay zones, mineral resource/open space zoning, or any other appropriate zoning that identifies the presence of identified mineral deposits and restricts the encroachment of incompatible land uses in those areas that are to be conserved.
 - ii. Record, on property titles in the affected mineral resource areas, a notice identifying the presence of identified mineral deposits.
 - iii. Impose conditions upon incompatible land uses in and surrounding areas containing identified mineral deposits for the purpose of mitigating the significant land use conflicts prior to approving a use that would otherwise be incompatible with mineral extraction.

After reviewing the Mineral Resources Section of the Conservation/Open Space Element of the County's Draft General Plan Update, it is our opinion that it falls short of the SMARA requirements listed above. In addition, the Land Use Element does not identify specific designations that would exclude competing land uses in areas where significant mineral resources have been identified. This is necessary as a precursor for zoning. For simplicity, this letter will address each of the SMARA requirements individually and provide an assessment for how the Draft General Plan Update fails to comply with SMARA.

I. Pursuant to SMGB Section 3676 (a) and SMARA Section 2762(a)(1), a General Plan is required to recognize mineral information provided within classification reports by summarizing or referencing it. To help lead agencies in making rational land use decisions, the Department of Conservation publishes mineral land classification reports. Mineral classification reports identify areas containing mineral resources of regional and statewide significance. These reports provide the following information that, therefore, must be incorporated into the General Plan of a lead agency.

1) The GP Update Mineral Resources section will be revised to reference the 1982 and 1996 reports, and to summarize the content of the 1996 report.

- Total permitted aggregate reserves;
- Calculated annual per capita consumption;
- Estimated annual production;
- Calculated years until depletion;

- Location of unpermitted aggregate resources;
- Projected 50-year demand.

As mentioned earlier, two mineral classification reports have been completed for San Diego County; these are:

1. Kohler, S.L & R.V. Miller. "Mineral Land Classification: Aggregate Materials in the Western San Diego County Production-Consumption Region." California Department of Conservation, Special Report 153, 1982.
2. Davis, James F. "Update of Mineral Land Classification: Aggregate Materials in the Western San Diego County Production-Consumption Region." California Department of Conservation, DMG Open-File Report 96-04, 1996.

The County of San Diego's Draft General Plan Update should summarize Open-File Report (OFR) 96-04 from 1996. However, the Draft General Plan Update does not provide a summary or a reference to either of the mineral classification reports. The General Plan Update must provide a summary of the 1996 mineral classification report.

As a further comment, on page 5-19 the Draft General Plan update summarizes the California Geological Survey "Aggregate Availability in California" report. In the third paragraph the Draft general plan states:

*"The total permitted aggregate resources as of January 2006 were 198 million tons, a 28 percent decrease from January 2001. The permitted aggregate resources represent only 17 percent of the 50-year estimated demand of **1,164 tons**. To meet demand, substantial volumes of aggregate are being imported from quarries located outside of San Diego County."*

Please note that it should be 1,164 **million** tons, not 1,164 tons.

In addition, the County is asked why they have drastically altered the mineral resources discussion found in the current General Plan Conservation Part X (pages X-55 – X-73). The discussion in the original General Plan on mineral resources provides good policies, however they have not been implemented. For instance, Policy 4 proposes a plan to identify areas for future extraction and encourages the preparation of Specific Plans for identified mineral resource conservation areas. Why is the Draft General Plan Update eliminating the language for mineral resource policies from the existing General Plan?

Example from existing General Plan:

POLICY 4 The County will manage aggregate resources through a phased program as follows:

Phase 2: Identify those deposits which are economically viable for extraction.

2) The typographical error identified by the commenter will be corrected.

3) The reason that various policies in the current General Plan were not included in the proposed Update is that they have proved to be infeasible for the County to implement. One of the examples cited in the 12-3-09, "Identify those deposits that are economically viable for extraction" involves business and profitability decisions that are outside of the County expertise or control. The economic viability of a particular proposal is also subject to substantial change over a short period of time.

RESPONSES

Phase 5: The County, with input from the extraction industry and other interested parties, may prepare and adopt a Specific Plan for each resource conservation area.

II. Pursuant to Section 3676 (a)(1) of SMARA a General Plan is required to provide maps by reference or inclusion of the identified mineral deposits and provide discussion within the text of the General Plan with regards to the location of mineral deposits and clearly defines those locations targeted for conservation and future extraction.

While the statute does allow a citation to the SMGB maps, the specific inclusion of the maps within the plan will greatly facilitate a user's identification of potential conflicts with mineral resource lands. In addition, it will enable county staff to conform the maps to other figures included in the general plan if needed.

Based on the mineral classification reports notation, areas containing significant mineral deposits are referred to as Mineral Resource Zones (MRZ). The classification reports utilize a numbering system, for identifying the existence and quality of a potential mineral resource. The numbering system ranges from MRZ-1 to MRZ-4 and is defined as follows:

- MRZ-1: Areas containing little or no mineral deposits
- MRZ-2: Areas containing significant mineral deposits
- MRZ-3: Areas containing mineral deposits, the significance of which requires further evaluation.
- MRZ-4: Areas of unknown mineral resource significance.

Areas where construction aggregate resources are confirmed to exist are classified as MRZ-2. These areas should be identified in the General Plan. The Draft General Plan Update does provide a map that clearly identifies areas containing mineral resources; however, it does not include all areas that have been designated as MRZ-2. For instance, Hester's Granite quarry and Rosemary's Mountain quarry are missing from the Mineral Resources Zones Map, Figure COS-4.

While the County does provide a map illustrating the location of MRZ-2 and MRZ-3 lands, it does not identify areas designated for future extraction. The General Plan Update must also identify those areas classified as MRZ-2 that will be conserved for future extraction to be fully compliant with SMARA requirements.

Detailed maps that identify production potential of underlying mineral resources can also be used to demonstrate the protection of resources close to projected development; thus enabling CEQA analysis that would demonstrate GHG reductions achieved by protecting such resources. Ultimately, protection of resources in close proximity to the area of utilization will result in reduced truck miles traveled. Considering regional demand is approaching 1.2-billion tons over the next 50-years, the reduction in GHG would be significant. As an alternative position, failing to

4) The map included in the current draft Mineral Resources section is a representation of a GIS layer in the County's computer archive. Portions of this map can be expanded such that Mineral Resource Zones can be related to individual parcels.

5) Hester's Granite Pit is shown on Figure COS-4 as a small area of MRZ-2 land in the Spring Valley area. Rosemary's Mountain quarry is located immediately adjacent to, and is not discernable from, the large area of MRZ-2 land located along the San Luis Rey River in northern San Diego County. As the map is a GIS layer, any portion of it can be expanded to show particular parcels such as those that encompass existing mining facilities.

6) The MRZ-2 and MRZ-3 areas shown on the map are the areas addressed in the proposed mineral resource policies COS 10.1 – 10.3, which encourage conservation/future extraction of mineral resources. Draft Policy COS-10.2 will be augmented to include the following provision:
The potential for the extraction of substantial mineral resources from lands classified by the State of California as areas that contain mineral resources (MRZ-3) shall be considered by the County in making land use decisions.

7) The type of information mentioned in this comment is found in the 1982 and 1996 Mineral Classification reports. These reports will be referenced and the information summarized in a revised draft Mineral Resources section.

protect resources could trigger the converse CEQA argument (i.e., adopting policies that will predictably increase GHG emissions by a quantifiable amount).

III. Pursuant to Section 3676 (b) and Section 2762 (a)(2&3) of SMARA a General Plan is required to provide statements of policy that would:

- **“Assist in the management of land use which affect areas of statewide or regional significance.”**
- **“Emphasize the conservation and development of identified mineral deposits” for future extraction.**

The following section will address the specific goals and policies proposed in the Draft General Plan Update and provide comment on how they satisfy SMARA mandates.

GOAL COS-10: Protection of Mineral Resources. The long-term production of mineral materials should be adequate to meet the local County projected 50-year demand for the county by ensuring sufficient permitted reserves. In addition, potential adverse effects on surrounding land uses, public health, and the environment should be minimized through the adoption using of operational techniques and site reclamation methods consistent with SMARA standards, and the Major Use Permit requirements governing surface mining operations . such that adverse effects on surround land uses, public health, and the environment are minimized.

Comment:

The original phrasing of GOAL COS-10 did not provide a clear understanding of the County's objective; suggested edits are included as underlined words. It should be noted that a Reclamation Plan is not a permit. It is the counties permit authority that governs how mines operate vs. how they reclaim as noted in PRC § 2757, which states:

The state policy shall not include aspects of regulating surface mining operations which are solely of local concern, and not of statewide or regional concern, as determined by the board, such as, but not limited to, hours of operation, noise, dust, fencing, and purely aesthetic considerations.

Policies:

COS-10.1 Siting of Development. Encourage the conservation (i.e., protection from incompatible land uses) of areas that have substantial potential for mineral extraction. Discourage development that would substantially preclude the future development of mining facilities in these areas except where approval of such development or uses in that location is necessary to meet other important public policy goals or needs. Design development or uses to minimize the potential conflict with existing or potential future mining facilities.

8) The suggested clarification to Goal COS-10 are helpful. Revisions incorporated as follows:
GOAL COS-10: Protection of Mineral Resources. The long-term production of mineral materials adequate to meet the local County annual demand, while maintaining permitted reserves equivalent to a 50-year supply, using operational techniques and site reclamation methods consistent with SMARA standards such that adverse effects on surrounding land uses, public health, and the environment are minimized.

9) Refer to response 6 above. The State-designated MRZ-2 and MRZ-3 areas are the areas that “have substantial potential for mineral extraction.”

RESPONSES

Comment:

To be in compliance with SMARA, the Draft General Plan Update would need to identify those areas that “have substantial potential for mineral extraction”. These areas could be identified as those being protected for future extraction. The County should evaluate which specific mineral resource zones will be protected for future extraction.

With regards to the language, “except where approval of such development or uses in that location is necessary to meet other important public policy goals or needs.” This statement is extremely vague and does not provide sufficient guidance. It is important to create policies that are measurable and enforceable; the language of this policy does not meet these criteria.

COS-10.2 Protection of State-Classified or Designated Lands. Discourage development or other incompatible land uses on or adjacent to areas classified or designated by the State of California as having important mineral resources (MRZ-2) except where approval of such development or uses in that location is necessary to meet other important public policy goals or needs.

Comment:

The County has not created a program that would manage lands surrounding areas designated as MRZ-2. Alternatively, it has adopted other land use management plans, such as the Multiples Species Conservation Program (MSCP) and the draft North County MSCP, which competes with mineral resource conservation regulations identified by SMARA and the SMGB regulations. To adequately manage lands containing mineral resources, surrounding lands should be given a designation which is compatible with mining. Mineral resource lands may be precluded from mining if surrounding areas are given incompatible land-use designations. For example, the MSCP allows for continuation of existing mining operations, but undisturbed MRZ-2 lands are targeted for open-space conservation where mining is not allowed or encouraged. These land-use conflicts have led to mineral resource sterilization.

Again the language, “except where approval of such development or uses in that location is necessary to meet other important public policy goals or needs”, is too vague and does not provide appropriate guidance. Vague statements can be interpreted in many ways and will only lead to the continued sterilization of the remaining mineral resources within the County.

It is suggested that for development that has the potential to sterilize mineral resources, the County should assess the impacts and provide policy to facilitate appropriate mitigation. For instance, development could occur on lands containing mineral resources if “in-kind” lands were set aside in another area designated for mineral resource extraction. To ensure the County is able to meet the projected 50-year construction aggregate demand, the County must establish policies that define and implement mitigation for the loss of mineral resources.

10) Staff agrees with the comment. The phrase “except where approval of such development or uses in that location is necessary to meet other important public policy goals or needs” will be deleted.

11) A new policy (COS 10.9) will be added to the draft Mineral Resources section that would provide a zoning overlay for MRZ-2 lands and an adjacent buffer area. The draft policy will read as follows:
COS-10.9 Overlay Zones. Provide zoning overlays for MRZ-2 designated lands and a 1,500 foot wide buffer area adjacent to such lands. Within these overlay zones, the potential effects of land use actions on potential future extraction of mineral resources shall be considered by the decision-makers.

12) Refer to response 10 above.

13) The concept of the establishment of “mineral reserve” areas has been previously reviewed with Mr. Coalson and other CalCIMA members. It has been suggested that the County’s MSCP program for habitat conservation serve as a model to establish a “mineral reserve” program. There are significant differences, however, between placing land in biological open space and reserving an area for mineral extraction. Unlike biological open space, mining involves land disturbance, noise, air emissions and transportation effects. The CEQA requirements to identify a specific mineral reserve area and give it special permit status are similar to those required to establish an actual mining facility. In this circumstance, it is more appropriate to limit CEQA analysis to actual mining proposals brought forth by the mining industry. Thus, the concept of mineral reserve areas is not included in the draft GP Update. The focus of staff efforts has been to develop policies supportive of mineral extraction and to develop zoning ordinance changes that would facilitate the permitting of actual mining facilities. Note that SMARA Section 2762 does not require the County to create “areas designated for mineral extraction” or preclude the County from approving development that would extinguish access to State-designated mineral resources.

RESPONSES

The General Plan Update should also define land uses that are compatible with mining. Mineral resource reserves should be surrounded by compatible land use designations and zoned to prohibit activities that would threaten access to these resources.

We would even take this consideration one step further; the county should ensure access to designated mineral resources. This action would require adoption of goals and policies to ensure access to mineral resources is established and maintained. However, only through a comprehensive approach to mineral resource planning can the county adequately achieve this ideal.

COS-10.4 **Compatible Land Uses.** Encourage the development of land uses that are compatible with the retention of mining or recreational access to non-aggregate mineral deposits, such as metals and gemstones.

Comment:

This should also be encouraged for construction aggregate resources. In addition, compatible land uses should be defined.

COS-10.5 **Reclamation Plans.** Require all mining projects to be conducted in accordance with a reclamation plan that meets the minimum reclamation standards required by the California Surface Mining and Reclamation Act and the associated State Mining and Geology Board regulations. Require the reclamation plan to include a time schedule that provides for the completion of the surface mining on each segment of the mined lands so that the reclamation can be initiated at the earliest possible time on those portions of the mined lands that will not be subject to further disturbance by the surface mining operation.

Comment:

It is impractical for many mining operations to provide specific time schedules for phased reclamation due to fluctuations in demand. SMARA already encourages phased reclamation, thus a policy that states mining operations should be in compliance with SMARA is sufficient. It is important to note that PRC 2772a(3) recognizes the uncertainty in identifying an end date for mining. As a result, 2772a(3) requires that a reclamation plan submittal provide, "The [proposed] dates for the initiation and termination of surface mining operation."

COS-10.6 **Conservation of Construction Aggregate.** Encourage the continued operation of existing mining facilities and promote the permitting of new mining facilities consistent with the goal to establish permitted aggregate resources that are sufficient to satisfy 50 years of County demand.

Comment:

To strengthen this policy the projected 50-year demand should be presented along with the calculation of current permitted reserves. This will enable the County to work towards establishing a measurable number of permitted reserves.

14) The compatibility of certain land uses with mining is a complex issue best addressed during project-specific review. For example, generally incompatible residential uses may be found compatible with a particular mining operation due to distance or site-specific topographic conditions.

15) Comment noted. SMARA does not require that the County ensure access to designated mineral resources. SMARA Section 2764 does address the issue of maintaining access to existing mining facilities.

16) Policy COS 10.2 addresses construction aggregate resources (i.e. MRZ-2 and MRZ-3 lands. Refer to response 6 above.

17) Staff agrees with the comment. Policy COS 10.5 will be revised to replace the phrase "time schedule" with "phasing plan."

18) Inclusion of current reserve figures in the policy is not recommended. The figures would change over time and the figures in the policy would become a source of confusion.

RESPONSES

COS-10.7 **Recycling of Debris.** ~~Encourage the installation~~ Permit the and operation of construction and demolition (C&D) debris recycling facilities as an accessory use at permitted (or otherwise authorized) mining facilities, where rock crushing is an element of existing and proposed operations, to increase the supply of available mineral resources.

Comment:

The suggested edits (double underline and strikethrough) allow recycling at all aggregate production facilities where rock crushing activities are allowed by permit or vested rights.

COS-10.8 **New Mining Facilities.** ~~Develop specific permit types and procedures for the authorization of new mining facilities that recognize the inherent physical effects of mining operations and the public necessity for available mineral resources adequate to meet local demand, in accordance with PRC Section 2762.~~

Comment:

The construction aggregates industry is supportive of this policy and is motivated to work with the County in establishing the criteria to be developed in the new permit.

IV. Section 3676 (c) provides a list of implementation measures that a lead agency should adopt in order to execute mineral resource goals and policies.

SMARA requires that the lead agency General Plan must also contain at least one of the following implementation measures:

1. Zoning or land use designation that identifies the presence of significant mineral deposits and restrict encroachment of incompatible land uses in areas which need to be conserved;
2. Record on property title about presence of significant mineral deposits; or
3. Impose conditions upon incompatible land uses in and around significant mineral resources areas to mitigate land use conflicts.

The Draft General Plan Update does not require implementation of these measures. For instance, land use designations have not been adopted to fully protect significant mineral resources for future extraction. The County also does not provide any information about mineral deposits on individual parcel deeds. Nor does the Draft General Plan Update place conditions upon incompatible land uses which are in and around significant mineral resource areas.

Land Use Element

Based on the language in the Draft General Plan Update, the intent of the Land Use Element *is to be a framework that provides maps, goals, and policies that guide*

19) The suggested language changes would be more restrictive than the current wording of the policy. It is the intent to encourage and allow recycling at all permitted or vested mining facilities, not just those where rock crushing is an element of an existing operation. Thus, the draft policy will not be modified. Zoning regulations that would implement this policy would address the specific permit requirements for recycling facilities as an accessory use.

20) Comment noted. The County welcomes the input of the aggregates industry in developing new ordinance language and procedures.

21) Refer to response 11 above in regard to item 1 listed in this comment. Item 3 is addressed by Policy COS-10.2.

22) Mineral resource issues will continue to be addressed in the Mineral Resources section of the draft GP Update. The Land Use Element will include references to the Mineral Resources policies.

planners, the general public, property owners, developers, and decision makers as to how lands are to be conserved and developed in the unincorporated County. It further states that, *central to the land use concept for unincorporated San Diego County is a development pattern that balances the land requirements of residential growth, with those of commerce, agriculture, recreation, and wildlife habitats.* Management of mineral resources is consistent with the goals of the Land Use Element. However, the General Plan Update Land Use Element does not address mineral resources. It is important to note that mineral resources are the basic raw materials that enable the County to achieve its development goals, and the County is mandated by SMARA to conserve mineral resource lands. Therefore, it is important for the County to take into consideration the location of mineral resource lands within the Land Use Element.

SMARA regulations also support the inclusion of mineral resources within the Land Use Element. To comply with SMARA Section 3676, the General Plan Update must use overlay maps or other appropriate planning maps that clearly identify mineral deposits targeted for conservation and possible future extraction. This SMARA mandate can be initiated in the Land Use Element by creating a land-use designation for those areas in the County that are targeted for future extraction. The General Plan goals cannot be accomplished without the mineral resources to support development projects; therefore it is critical to consider areas within the County that should be designated for future extraction. A mineral resource land-use designation would enable the County to manage lands on a comprehensive level.

SMARA also requires the lead agency to protect mineral resources from incompatible land uses. With a mineral resource land use designation, the Land Use Element can successfully manage these lands by assigning surrounding lands a use designation which is compatible to mining. SMARA provides guidance for the County on the types of land uses that are compatible with mining, Section 3675 defines both compatible and incompatible land uses. Examples of such uses may include, but should not be limited to:

- **Compatible Land Uses:** Very low density residential, recreational, agricultural, silvicultural, grazing, and open space.
- **Incompatible Land Uses:** High density residential, low density residential, public facilities, geographically limited but impact intensive industrial, and commercial

It is our opinion that the General Plan Update should address mineral resources within both the Land Use and Conservation Elements to insure the County is compliant with SMARA.

Other Solutions

The greater County (incorporated and unincorporated) has more than 95,000 acres classified and designated as MRZ-2, significant mineral resources. However, the majority of these resources are unavailable due to the presence of competing land

23) Refer to responses 1, 4, 5, 6, 7 , 11 and 13 above.

24) Refer to responses 11 and 14 above.

25) Comment noted. The County supports the current efforts of SANDAG to evaluate available mineral resources in the region.

uses and restrictive environmental regulations. San Diego County, in cooperation with SANDAG and the Department of Conservation, should look at the utility of existing policies on the availability of mineral resources. Because the majority of the MRZ-2 resources have become unavailable, a new approach is necessary.

The new approach should evaluate existing MRZ-2 and MRZ-3 resources for the purpose of meeting future resource demands. In addition, land use compatibility should be approached from a mineral resource perspective (first), then for compatibility with other resource values. Where existing MRZ-2 lands are no longer suitable for mining, the classification should be eliminated. Where areas are identified that have strong potential for mineral resource production, these lands should replace existing, sterilized MRZ-2 lands. However, no change in classification should be allowed, unless and until, a new system has been established.

Newly classified lands should then be placed into mineral resource reserves. These reserve areas should be located throughout the western portion of San Diego County in close proximity to areas of highest demand. The distance from the aggregate production facility to market has a strong influence on the environmental impacts that result from these operations. For instance, the proposed Otay Hills aggregate project in south San Diego County would reduce truck mileage by 17,000 miles per day. Strategically located aggregate resources can have a substantially beneficial affect on air pollution and roadway congestion. It should also be noted that aggregates are a high-bulk, low-value commodity. As a result, transportation has a substantial influence on the cost of delivered aggregates. In addition, where aggregate sources are located in close proximity to their markets, lower costs will result.

As a follow-up to this discussion, it is not acceptable to require an assessment of impacts to mineral resources, while also not establishing methods to offset identified significant impacts. The County's MSCP program is a successful model that should be applied similarly for mitigating impacts to mineral resources.

Conclusion

San Diego County is experiencing a severe shortage of locally produced aggregates. This shortage is partially the result of a lack of adequate mineral resource planning by the County's land use agencies. The County of San Diego's Draft General Plan Update does not implement the mineral resource conservation policies required by SMARA. In the interest of assuring adequate protections for the state and the San Diego region's scarce natural resources, we strongly recommend the Draft General Plan Update, be revised to incorporate these policies.

The County should also consider the environmental impacts as a result of approving competing land uses which eliminate the potential to recover mineral resources. Competing land uses include the establishment of habitat preserves that clearly discourage or prohibit mineral resource development.

26) Refer to response 13 above.

27) Refer to response 13 above. The mitigation obligation for a development project rests with the permit applicant, not the County.

28) The situation regarding a shortage of aggregate supplies is recognized by the County. Impacts on State-designated mineral resources are currently considered by the County when evaluating proposed development projects. Staff agrees that the availability of local aggregate sources would reduce regional air quality impacts.

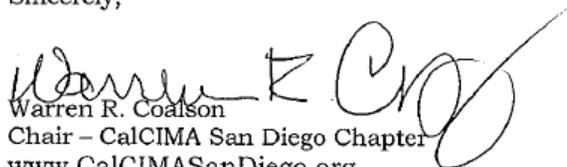
Although the impact of aggregate extraction can appear to be substantial for near-area land uses, the overall environmental impacts are substantially reduced when these resources originate in close proximity to the area of use. In addition, the cost to provide these resources is also substantially reduced where transportation requirements can be decreased.

Noted

We urge the County to move rapidly to incorporate these policies within its Draft General Plan Update. Continuing to ignore these requirements is resulting in a loss of access to mineral resources.

Should you have questions or comments, please call.

Sincerely,


Warren R. Coalson
Chair - CalCIMA San Diego Chapter
www.CalCIMASanDiego.org
619-284-8515

cc: Gregory Cox, Supervisor District 1
Diane Jacob, Supervisor District 2
Ron Roberts, Supervisor District 3
Pam Slater-Price, Supervisor District 4
Bill Horn, Supervisor District 5
Allen Jones, Chairman, State Mining and Geology Board
Dennis O'Briant, Chief, Office of Mine Reclamation
John Parrish, State Geologist
Gary Hambly, CalCIMA President

California Native Plant Society

RESPONSES

January 12, 2009

Department of Planning and Land Use
5201 Ruffin Road, Suite B
San Diego, CA 92123
FAX (858) 694-3373
gpupdate.dplu@sdcounty.ca.gov

Re: SAN DIEGO COUNTY DRAFT GENERAL PLAN VERSION 1.0, 12/30/08

Dear San Diego County Department of Planning and Land Use;

This letter contains comments on the *San Diego County Draft General Plan*. The California Native Plant Society (CNPS) is a non-profit organization dedicated to conservation of California's native plants and their natural habitats, including conservation of sensitive and threatened plant species, plant communities or habitats, and the problems caused by invasive non-native plants.

We find that the language in the Conservation and Open Space Element would be improved by making the goals more specific, and by improving the linkages between goals in the Biological Resources section, and by creating a method to resolve conflicts between conservation and development goals. We request that the document describe in more detail the County's goals, how to measure progress towards those goals, and how to develop funding for implementation and management.

The opening paragraph in the Element states that the goal of conservation is to "balance the accommodation of future growth and development...". We suggest that the goal of conservation should be to create a sustainable, economically viable ecosystem for the community, one in which proper management of natural resources is a foundation for a healthy community. In order to achieve this, the goals must be specific and measurable and a commitment to measure and change course if necessary must be available. These items are lacking from the plan.

Judging from use of phrases such as "when possible", etc., the document implies that a decision model of some kind is being used. Please be explicit in describing what this decision model is.

Use of words such as "encourage" and "facilitate" weaken the statements containing them. In the absence of a decision model or other explicit rules, these words make it impossible to tell what the statements mean and how the goals rank relative to other goals. Are there any consequences if the County "encourages" an action, but the action does not take

Staff appreciates your comments.

Noted.

This opening statement has been revised and the requirement to "balance" has been removed. There are currently several measures in the plan, such as the acres of land being preserved, along with a measurement of emissions required by the Climate Change Action Plan.

"When possible" is generally used for projects that undergo a discretionary review process.

Most of the policies in this plan "require" certain actions. In instance where the County does not have this authority, words like "encourage" or "coordinate with" were used. The Implementation Plan will include timely and measurable actions to implement the GP.



Dedicated to the preservation of California native flora

RESPONSES

place? If the County is serious about achieving these goals, we recommend that these words be replaced with specific, measurable, achievable, realistic, and timely goals (S.M.A.R.T. goals).

We find that the language in COS-6 (Agricultural Resources) is strong: the desire by the County to preserve these resources is clearly communicated. We request that similar strong language be used for the Biological Resources section.

Noted

Comments on sections COS-1, COS-2, COS-3:

In general, these sections do not have goals that are specific or strong enough to achieve the vision stated in the Biological Resources introductory paragraphs. Human development has detrimental effects on the natural environment in many ways: grading, introduction of invasive non-native plants, increased erosion from removal of vegetation and creation of trails, noise and nighttime lights. We find that the general plan fails to deal adequately with most of these.

Noted.

We recommend that the County create a goal to develop a **technical advisory committee** or similar body, composed of program managers, scientific and policy experts, and conservation groups, in order to develop an achievable plan across jurisdictional boundaries. Such a group is valuable in addressing areas of conflict and in forming a common vocabulary within which to address problems. Such a committee would allow programs to work synergistically to save the County's resources by avoiding duplication of effort. A **model** of such a technical advisory committee is the Los Angeles and San Gabriel Rivers Watershed Council in Los Angeles County (<http://www.lasgrwc.org/>).

The County used several technical advisory committees, such as for the MSCP program or in development of Guidelines for Determining Significance. In addition, the County participates with SANDAG regional forums for watershed and other issues.

COS-1.1: Could a map that shows proposed wildlife corridors and linkages be shown?

COS-1.1. If appropriate, these maps will be included in community plans.

COS-1.2: How does the County decide when public infrastructure in preserve areas is "unavoidable"?

COS-1.2. When total avoidance of the preserve is not feasible.

COS-1.3: The goal of simply "facilitating the survival" of rare and endangered wildlife is extremely weak and could be accomplished by putting one member of each into a zoo. A better goal is to work towards increasing the protection and population of these **species in order to move them from the rare, threatened, and endangered lists, and to prevent other species from being added to the lists.**

COS-1.3. Staff does not agree that this language is weak.

COS-1.3: discuss developing a **funding mechanism** for management of the preserve system.

COS-1.3. Policies COS-1.7 and COS-1.8 have been added that address funding.

COS-1.4 and 1-5: Collaboration is essential to achieve a healthy natural ecosystem in San Diego, but it is a means to achieve the goals of conservation, not a goal in itself. We recommend adding this to a goal to create a technical advisory committee.

COS-1.4/5. This is addressed in the Implementation Plan. [See Implementation Measure 5.1.1.I Wildlife Agency Coordination]

RESPONSES

Page 5-7: The sidebar at the bottom of the page appears to endorse the use of non-native plants to “enhance wildlife habitat areas”. CNPS **does not consider this to be appropriate for habitat conservation**. Non-native plants rarely fulfill equivalent roles to the plants that they displace in an ecosystem. We recommend removing the words “compatible non-native non-invasive plant species”.

Other goals that we recommend:

- Identifying priority land for conservation
- Creating buffers between development and natural lands, including wetlands
- Annual monitoring of the health of conservation land and publication of the results on the County website
- Promoting practices, such as hedgerows, that make agricultural lands compatible with habitat development
- Develop a management plan for conservation areas in the County, one leg of which is control of invasive non-native species.

COS-2.1: Why is restoration and enhancement mentioned only in the context of development in Rural and Semi-Rural Lands categories? Restoration and habitat enhancement would be an appropriate goal for all conservation land.

COS-2.2: We recommend that the County adopt a goal to **group housing units** in order to reduce the negative affect of sprawl development on the native environment, and to provide better protection of homes against wildfire. This would be consistent with other goals in the General Plan.

Invasive non-native species are mentioned in the Biological Resources section only in the context of wetlands, under COS 3-2. Weeds are a problem throughout the undeveloped lands of the County, and affect wetlands and uplands alike. Additionally, weeds create “flashy fuel” that is easier to ignite than native chaparral. In this case, management of non-native weeds is important to native plants, native habitats (including, but not limited to wetlands), and fire, and it should be managed across these plan elements.

We note that the horticulture industry has been responsible for the introduction and spread of many invasive, non-native species that negatively affect native plants and native habitats. CNPS works with the agricultural community on the state and local levels to promote native and non-invasive alternatives to many of these problematic

Staff appreciates your comment, but does not agree that non-native, non-invasive plant species could not be beneficial as habitat.

Pre-Approved Mitigation Areas (PAMA) have been identified as the priority areas to conserve, along with Resource Conservation Areas, which are identified in Community Plans. Staff appreciates your comments, but does not feel that new goals are necessary. Again, some of these issues are being addressed in the Implementation Plan. [See Section 5.1 Biological Resources]

This policy refers to land outside of preserves (conservation land). The County’s highest priority is to preserve sensitive resources in semi-rural and rural areas, while allowing more flexibility in villages so that population increase can still be accommodated.

These goals are included in the Land Use and Safety Elements.

Noted.

RESPONSES

This is outside the County's authority.

Noted.

The Safety Element (Chapter 7) of the General Plan includes policies that address your concerns with defensible development (refer to Goal S-3 through S-6 and the related policies under each goal).

The County appreciates your comment. Goal 14 of the Conservation and Open Space Element and the related policies (COS 14.1 to 14.13) address energy and sustainable development. COS 14.11 is intended to set policy that minimizes impacts to native vegetation because of its value in removing carbon from the atmosphere. We agree that using "clearing" in the context of vegetation management may be confusing. As such, the County agrees to replace "clearing" with "vegetation management."

invasive plant species, and we advocate that San Diego County do likewise, by promoting the use of locally native and above all, non-invasive plants in all landscaping, drought tolerant or otherwise. Invasive plant control costs billions in the US annually, and preventing the introduction of such species before they become established is the cheapest and most effective means of control. We recommend the addition of a goal that **"the County will prevent the sale and use in landscaping of invasive non-native plants (as defined by the California Invasive Plant Council)"**.

COS-14.11: The State of California has recognized that it is **scientifically unjustified to call out native vegetation as a particular fire hazard**. In 2008, the state codes were modified to reflect this in SB 1595 (An act to amend Sections 51175, 51177, 51178, 51182, 51183, and 51189, of the Government Code, and to amend Sections 4202 and 4291 of the Public Resources Code, relating to public resources), where references to "native vegetation" were replaced by "flammable material".

The word **"clearing"** is **not recommended**, as it gives homeowners the impression that all vegetation should be removed, which is not consistent with proper practice, since this will cause other unwanted effects such as increased erosion and decreased storm-water quality.

We recommend that this goal be simply removed, since it is covered by state law, or replaced with **"Require development to adopt fire-safe practices that include modifications to the structure and to all fuel within 100 feet of the home in order to reduce the danger to the structure."** We would like this document to acknowledge that it is possible for structures to be built and maintained in a fire-safe manner without eliminating natural habitat values.

Thank you for your consideration,

Carrie Schneider, Conservation Chair
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RESPONSES

January 8, 2009

Mr. Jeff Murphy
County of San Diego
Department of Planning and Land Use
General Plan Update
5201 Ruffin Road, Suite B
San Diego, CA 92123

COMMENTS ON THE DRAFT GENERAL PLAN UPDATE

Dear Mr. Murphy,

The Rancho Santa Fe Association appreciates this opportunity to comment on the Draft General Plan. In our review of the Elements, the Association has identified several areas of concern that are either within, or that may impact the Covenant area of Rancho Santa Fe.

Each of the comments listed below are grouped by individual element (e.g., Land Use, Mobility) and include the page number, corresponding goal, policy or introductory text from the draft document.

General - Introduction

An overriding general concern is that most of the proposed policies are written as mandates using words like *require*, *avoid* and *prohibit*. This type of language is equivalent to using the word *shall*, as opposed to the word *should*. While on occasion this may indeed be appropriate, in most cases the result will be policies that may be in conflict with each other (e.g., LU-6.8, COS-2.2, and COS-14.5) resulting in potential internal inconsistencies. It is also important to note that the *State of California General Plan Guidelines* do not require the use of mandatory language. Therefore, the Rancho Santa Fe Association urges the County to reconsider the use of permissive language (i.e. should) when appropriate.

Staff appreciates your comments

Noted

The use of “shall” over “should” is in compliance with State General Plan Guidelines. To quote the Guidelines when referring to the use of “Should” – “It is better to adopt no policy than to adopt a policy with no backbone.” As currently written in the draft GP, there are many examples where policy language has been modified to be less restrictive through the use of “Encourage”, “Support”, and “Promote”.



DPLU - PPCC

The Draft General plan also includes several policies that will commit the County to develop future plans or programs. In the past, policies such as these have resulted in successful litigation against the County because the plan or program was not completed. How will the County ensure that required programs will be completed and adopted?

- Page 1-14 includes the following statement:

Equity and Social Well Being: providing good education, income, health, safety, arts, and cultural attainment for all.

While social and economic parity may be laudable goals, they go far beyond the County's Strategic Initiatives; Kids, the Environment, Safe Livable Communities which again could result in a successful legal challenge to the General Plan. The statement shown above should be revised and narrowed in scope to reflect actual land use issues such as the provision of parks, libraries and public safety along with access to schools and the avoidance of incompatible land uses.

General – Guiding Principles

- Page 2-7 describes the edge of a village as being defined by:

...a "limit line" that can be used to differentiate permitted development densities and design standards.

However, none of the policies in the Land Use Element reference a Village Limit Line, nor its placement or purpose. If used, would a Village Limit Line circumscribe only village densities (as indicated in the Community Development Model diagram), or could it extend into adjacent and contiguous semi-rural areas? Because development densities are controlled by the Land Use Designation, what would a Village Limit Line do in this regard? If it is intended to prevent future general plan amendments between regional categories, how would its application differ from LU-1.2?

Alternatively, would a Limit Line be used to control sewer availability? (Please see the related comment for LU-14.4.) At this point in time without further definition, the Rancho Santa Fe Association is concerned about both the purpose and location of a Village Limit Line in Rancho Santa Fe.

- Page 2-12 includes additional statements regarding economic and social equity. Please refer to our comment above regarding social and economic parity.

RESPONSES

The Implementation Plan will provide more specific details on these programs. In addition, it is staff's intention that the Implementation Plan will continually be updated and its progress tracked through the annual report prepared on the status of the GP, as mandated by state law.

Paragraph revised as recommended.

The Village Limit Line is intended to be implemented on a community by community basis as defined in individual community plans.

Staff appreciates your comment, but does not agree that this language should be changed because it addresses a nexus between land use issues and the resulting social and economic benefits

RESPONSES

- Page 2-12 also includes the following statement related to the reuse of wastewater:

Wastewater should be reused for irrigation, toilets, and other suitable purposes.

The Association supports the appropriate reuse of treated wastewater. However, there is no specific policy which would require the use of treated wastewater or dual-piping (to provide a supply of both potable water and treated wastewater) in large new developments or subdivisions where available. (Please see our related comments for policies COS-4.1 and COS-19.1.)

A policy has been added to the Water Resources section of the COS Element.

Land Use Element

- Page 3-3 includes the following statement:

Where appropriate, the Community Plan may restrict development within the Special Study Area until more detailed plans are prepared and approved, so that interim development does not preclude the preparation and implementation of the study.

Because the description of Special Study Areas includes the Village Core Mixed Use designation, this statement raises several questions and concerns:

- The Mixed Use designation includes a maximum FAR of 1.3 and a maximum density of 30 dwelling units per acre.
- What land use impacts will the EIR analyze for Mixed Use areas? If a more intense combination of uses is proposed by the Community Plan than was analyzed in the EIR, any subsequent project (e.g., the Community Plan) will need to comprehensively analyze impacts for all of the elements including potential impacts to adjacent communities.
- How long will it take to prepare detailed plans for such areas on a countywide basis? What type of restrictions will be imposed on development in Mixed Use areas in the interim?

Furthermore, Footnote 'A' in Table LU-1 on Page 3-12 states that the FAR may be exceeded in certain circumstances:

- How can the FAR listed in the General Plan be exceeded? How would any resulting impacts be analyzed?
- The combined maximum intensity and density cannot be achieved within the current (and anticipated) three-story maximum and 35' height limit in the Zoning Ordinance.

Mixed-use areas are considered 100% impacted by the EIR. Traffic impacts were evaluated assuming 50/50 residential / general commercial development, where residential densities were assumed to be VR-10.9 du/acre. This

In some cases where the FAR is exceeded represents existing conditions, such as in Julian. The FAR is not the sole driver of the impact analysis in the EIR. Any subsequent instances will need to be evaluated in light of the EIR and should impacts be determined, then subsequent analysis will be required.

The FAR describes the upper range of each category. No expectation that both would be achieved. Table has been revised to better clarify this.

- The intensity and density are too high and are not compatible with the village of Rancho Santa Fe and the surrounding areas.
- Page 3-15 states:

Specific maximum FAR and residential density standards shall be developed through community-specific town center planning, though in no case, within either multiple- or single-use buildings, may nonresidential intensities exceed 1.3 FAR or residential densities exceed 30 units per acre.

This statement is internally inconsistent with Footnote 'A' in Table LU-1. Therefore, the Association strongly recommends that both the FAR and the density for the Mixed Use Designation be reduced and that Footnote 'A' be removed. Within the Village of Rancho Santa Fe, the maximum FAR allowed by the Covenant is .6 to .75. The Association would also oppose any future increase in the number of stories or height limit.

- Policy LU-5.2 on page 3-24 and policy LU-6.8 on page 3-26 both use the word "require" when referring to new development. If sustainable project design features conflict with conformance with existing topography (i.e. limited grading and not significantly altering dominant physical features), which policy prevails? This again illustrates the potential problem with the use of mandatory language. Please reconsider the use of permissive language (i.e. should) when appropriate.
- Policy LU-11.1 on page 3-32 encourages locating commercial, office and industrial development in Village areas. Please clarify that this policy only refers to Limited Impact Industrial development. Both Medium Impact and High Impact Industrial uses are generally incompatible with Village locations.
- Unfortunately, a recent decision by the U.S. District Court at the end of 2007 and subsequent rules enacted by the Fish and Wildlife Service in 2008 regarding protection of the delta smelt are likely to reduce water deliveries to Southern California. In fact, Lester Snow, the Director of Department of Water Resources has said that combined state and federal water exports (from the delta) could be reduced by as much as 33% during dry years.

In light of that and to be consistent with policy LU-13.1, has the County confirmed with the County Water Authority that there will be an adequate water supply for the growth contemplated by the plan?

- Policy LU14.4 on page 3-39 states:

RESPONSES

The FAR and densities are maximum and lower threshold can be set in individual community plans.

See statement above. The San Dieguito Community Plan should establish limits that are appropriate for your community.

Staff does not agree that sustainable design and conformance with existing topography are conflicting goals.

Staff feels that some medium and high-impact industrial uses are appropriate in some villages when appropriate buffers and screening is provided. Policy has been revised to add qualifying language "when feasible".

Noted

The County has coordinated with the CWA in preparation of this plan. The CWA is in the process of updating their plan and has committed to plan for the forecasted growth of both the cities and unincorporated communities served by member agencies.

Prohibit sewer facilities that would induce unplanned growth. Require sewer systems to be planned, developed, and sized to serve the land use pattern and densities depicted on the Land Use Map.

The Association agrees with the portion of policy LU14.4 shown above. However the Association may disagree with the remaining portion of the policy (unless further clarification is provided) as follows:

Sewer systems and services shall not be extended beyond Village boundaries except when necessary to preserve open space or serve civic facilities.

In general, sewer systems and services should not be used as growth control mechanisms. Regulating growth is most properly the function of the Land Use Map and Land Use Element policies.

Existing development outside of the Village area but within the Covenant is served by a combination of septic and sewer. As written, this policy would preclude a sewer extension for future subdivisions outside of the Village area, even when the proposed subdivision is consistent with the land use designation. If the intent of the policy is to prohibit any sewer extension outside of the Village, the Association opposes the second portion of this policy.

There are several conceivable circumstances where extension of sewer facilities could be beneficial. For example, on-site wastewater treatment (e.g., septic systems) can contribute to contamination of groundwater resources and limit opportunities for good site planning because of the large amount of land required for leach fields and the 100% reserve area. Therefore, the Association strongly recommends that the absolute prohibition on extension of sewer lines beyond Village boundaries be removed.

Policy has been revised to allow sewer extensions for "health, safety, and welfare" purposes.

Mobility Element

- Page 4-23 includes the following statement:

Providing an ample supply of free parking supports an automobile-oriented society, while downplaying transit, walkability, and safety.

Noted

This statement seems ill-advised with respect to the unincorporated area and implies that less-than-adequate parking will be required as a means to force residents to use transit. Most Village areas in the unincorporated County have neither the density nor the infrastructure to accommodate the type of transit available to densely populated urban areas. Providing an

appropriate amount of parking is vital to the commercial success of Villages and Rural Villages and should be encouraged.

- Policy M-10.2 on page 4-24 states:

Require the design and placement of on-site automobile...parking in Villages and Rural Villages that encourages pedestrian activity.

This policy is not clear. Is the intent to require "community parking lots" or to require shared parking or simply to orient surface parking towards the rear of the lot?

- Appendix M3 on page 4-32 does not include Paseo Delicias as a roadway where a lower level of service is acceptable. Del Dios Highway becomes Paseo Delicias west of the Camino del Norte intersection and will function at LOS E or F until the intersection of Via de la Valle. Please include the portion of Paseo Delicias described above in Appendix M3.

Conservation and Open Space Element

- Policy COS-2.2 on page 5-8 requires development:

...to be sited in the least biologically sensitive areas of the site to minimize the loss of natural habitat, including woodlands, forests, and tree resources.

As with our comment in the Land Use section of this letter, in the event of a conflict with other policies using mandatory language (e.g., LU-6.8, COS-2.2, and COS-14.5) which policy prevails?

- Policy COS-4.2 on page 5-10 would require the use of native or drought tolerant plants for landscaping. How will this policy be implemented? Is it intended for new development only, and if so, will it be applied just to commercial areas and the common spaces in residential developments? As written, the policy is vague and should be clarified.
- Item number 8 in Table COS-1 on page 5-25 appears to include an incorrect road as a part of the Scenic Highway System. The correct road segments are Del Dios Highway, Paseo Delicias and Via de la Valle.
- The Association supports the "undergrounding" of overhead utilities. How will the County encourage the "undergrounding" of overhead utilities in existing developments as described in policy COS-11.7 on page 5-27?
- Policy COS-14.12 on page 5-33 requires that elements such as "cool roofs" be incorporated into project designs. The Association would oppose any

RESPONSES

Language has been added to the policy to clarify its intent.

Appendix has been revised to include Paseo Delicias.

Staff does not concur that these policies are mutually exclusive, but implementing regulations will be revised when necessary. For example, the RPO is being revised to allow more encroachment into areas with steep slopes when sensitive resources are being protected.

Policy language has been clarified to distinguish that plants are encouraged for new development, but efficient irrigation systems are required across the board. Policy will be implemented by a revised landscape ordinance.

Table has been revised

This would be implemented by measures such as supporting efforts of revitalization committees or through road improvement projects.

requirement for visible roof coverings that is inconsistent with the aesthetic requirements of the Covenant. Please remove or revise the "cool roof" requirement so that it would not apply within the Rancho Santa Fe Covenant area.

- Policy COS-19.1 states:

Require land development and building design practices that minimize water consumption, as defined in preceding policies.

To which preceding policies does this refer?

- Policy COS-19.2 'promotes and supports' the use of recycled water in new developments. However, this policy would not require the use of recycled water for new, large developments where available. The County should consider requiring the use of treated wastewater in certain circumstances where a recycled water supply is available.
- Goal COS-21 would seek to provide 10 acres of local parks for every 1,000 persons. How does this compare with the current acreage for local parks for each of the planning or sponsor group boundaries?

Housing Element

As stated previously in the Land Use section of this letter, the Mixed Use designation in Table LU-1 on Page 3-12 includes a maximum FAR of 1.3 and a maximum density of 30 dwelling units per acre. The combination of this FAR and residential density is unbuildable with current height limits and surface parking requirements.

- Page 6-6 of the Draft Housing Element recognizes this in the following statement:

...residential densities exceeding 20 or 30 units per acre...are not likely to be constructed, even when permitted, due to infrastructure limitations, environmental resource locations, and market conditions. In addition, densities above 15 or 20 dwelling units per acre are not consistent with the rural character of the County's communities.

This statement is true, although internally inconsistent with the maximum density in Table LU-1.

- Page 6-10 states the following:

RESPONSES

The policy includes the word "as appropriate" to provide flexibility in how the heat island effect would be minimized.

Policy has been revised to remove "as defined in preceding policies" and further clarification has been provided.

Policy has been revised as recommended.

Generally 10 acres is more than is currently provided.

Refer to previous comment on page 3.

Staff does not agree with the statement that this would be internally inconsistent. In addition, densities above 15 to 20 du/acre were not applied in rural communities.

RESPONSES

In areas without access to sewer, major new developments will continue to rely on single-family units but should utilize clustering and small lots to reduce land and infrastructure costs.

Although the minimum lot size established the Rancho Santa Fe Association Regulatory Code is 2.86 acres outside of the Village area and clustering is not allowed, it is not possible to utilize clustering on small lots without sewer. Therefore, the statement above is factually incorrect. This is another reason why policy LU-14.4 should be revised to allow sewer extensions into adjacent semi-rural areas.

- Policy H-1.2 states:

Encourage a development intensity of at least 80% of the maximum permitted gross density for sites designated at 15 to 30 dwelling units per acre in development projects.

This should be clarified as being applicable only to **vacant** lands with a **residential** designation of 15 to 30 dwelling units per acre. Even then, how is this policy consistent with the statement described above from page 6-6? The Association understands the challenges of the RHNA process, but is concerned about potential unintended consequences of the policy that would negatively impact the Village of Rancho Santa Fe.

Safety Element

- The Fire Hazard Map labeled as Figure S-1 appears to be out of date and should be replaced with the most recent Fire Hazard Map using a 2007 or 2008 data set.
- Safety policy S-6.3 would require new development to make a fair share contribution for the provision of fire and emergency services. However, this contribution can only be for capital projects and not for ongoing operation and maintenance costs.
- Policy LU-12.2 on page 3-38 would also require new development to maintain (and not degrade) existing service levels. How would operation and maintenance costs for fire and emergency services be funded? At best, policy S-6-3 is unclear with respect to funding for ongoing costs. Therefore, the County should amend the policy to include an explicit provision for funding ongoing costs for fire and emergency services so that service levels for existing developed areas would not be degraded.
- Policy S-6.4 states:

Staff does not concur that clustering is not possible without sewer. Lot sizes would have to be consistent with requirements for the use of septic tanks or alternate sewage disposal systems.

There is only one area in Rancho Santa Fe with a density as high as 15 du/acre. Since this area is completely built-out, it would not be applicable.

The Final Map will be revised to use most recent data. The current Map is used to be consistent with the EIR analysis, which used the most recent data available at the time.

Implementation of a Melo Roos is being considered for ongoing operation and maintenance.

See above response.

RESPONSES

Require that development demonstrate that fire services can be provided that meet the minimum travel times identified in Table S-1 (Travel Time Standards).

Travel times, even though they are used in the Existing General Plan, are not the appropriate measurement for fire protection services. The appropriate measurement is **response times**, which are described on page 7-7. Travel times do not include 'reflex' time (the time from when the 911 call is received to when the fire engine leaves the station). Therefore, there is no way to determine if the travel time will meet the intended purpose described in Table S-1. Please revise policy S-6.4 and Table S-1, working in conjunction with the fire service to achieve the intended purpose, using response times.

- The Fire section of the Safety Element should include an exhibit showing the preferred locations of future fire stations based on future population growth. Station locations would not be parcel specific, but instead indicate a general location using response times from the station to population centers.

- Policy S-13.1 states:

Coordinate new law enforcement facilities and services with new development, particularly when a lack of services would substantially degrade existing law enforcement service levels.

This policy is unclear and is internally inconsistent with policy LU-12.2 on page 3-38, which requires that service levels for existing development be maintained.

- Policy S-13.2 also states:

Locate Sheriff facilities to best serve existing and planned population growth.

The Law Enforcement section of the Safety Element does not contain any response time standards. Without such standards, what methodology would be used to determine locations for new facilities and when existing service levels would be degraded? Both this policy and the one above will require some response time metric in the General Plan for implementation. Population growth alone can only be used to help determine overall staffing needs, not locations.

Like the Fire section, the Law Enforcement section of the Safety Element should include an exhibit showing the preferred locations of new sheriff stations based on future population growth. Station locations would not be parcel specific, but instead indicate a general location by using response

Staff appreciates your comment, but does not agree. Travel times are used in lieu of response times, because there are no consistent standards for appropriate "reflex" times, but these times should be fairly consistent among stations because of the requirement to have 24-hour staffed stations.

This figure is included in the Safety Element Background Report and staff does not consider it necessary to also include it in the Element.

Policy LU-12.2 has been revised.

Response time standards for law enforcement are not an appropriate tool because they rely on law enforcement personnel patrolling, so their responses are not from a fixed location.

Staff does not concur that it is appropriate to put this information in the Safety Element.

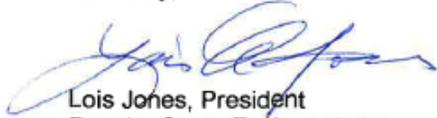
RESPONSES

times for beats within the proposed service area, based on where future growth is programmed.

Finally, some of the definitions in the Glossary should be revised to accurately reflect glossary term (e.g., Industrial User).

Thank you for the opportunity to comment on the Draft General Plan. The Rancho Santa Fe Association looks forward to working with you and reviewing the revised General Plan Elements and the Draft EIR.

Sincerely,



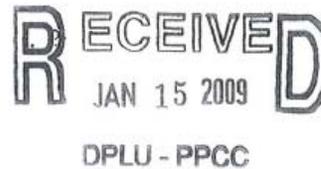
Lois Jones, President
Rancho Santa Fe Association

Cc: Pete Smith, Association Manager
Ivan Holler, Association Planning Director
Bill Horn, Supervisor

The “Industrial User” term and many others have been removed from the glossary.

January 13, 2009

General Plan Update
Department of Planning and Land Use
County of San Diego
5201 Ruffin Road, Suite B
San Diego, California 92123-1666



Re: General Plan Update Draft General Plan

Dear Sir or Madam:

The San Diego Archaeological Center (SDAC) was a participant in one of the groups organized as part of the County's earlier General Plan 2020 Update process. We therefore read with great interest the Draft General Plan that was released for public comment last month.

Chapter 5 of the Draft General Plan, the Conservation and Open Space Element, includes Goal COS-7:

Protection and Preservation of Archaeological Resources. Protection and preservation of the County's important archaeological resources for their cultural importance to local communities, as well as their research and educational potential.

Noted

We support this goal, as well as Policies COA-7.1 through 7.6. However, the text show in italics under Policy COS-7.3, Archaeological Collections, may not be accurately conveying the County's intention. We refer specifically to the sentence:

Many collections should be placed in a local collections curation facility that meets federal standards per 36 CFR Part 79.

To avoid introducing ambiguity on the County's policy for curation while still recognizing that certain material may require repatriation to the appropriate groups, we recommend that sentence be changed to read:

All collections, other than those required by law to be repatriated, should be placed in a local curation facility that meets federal standards per 36 CFR Part 79.

Policy revised as recommended.

The italics text following Policy COS-7.3 should also be expanded to include a commitment for the County to bring all County-owned collections into curation. While the County has made significant progress toward that, we are aware that County Parks, for example, has collections in a commercial document storage facility that does not meet the 36 CFR 79 standards. To ensure that there are not others, the text under COS-7.3 should also be expanded to indicate the County's intent to conduct an inventory of collections it holds or are held by cultural resources consulting firms.

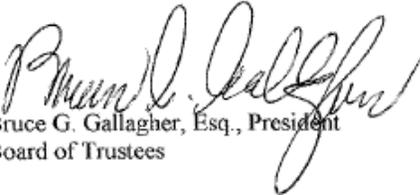
Textbox expanded as recommended.

RESPONSES

Policy COS-7.6, Cultural Resource Data Management, could be expanded to include in the central database a notation whether collections from each site are being curated and, if so, where.

We await next year's circulation of the Draft Environmental Impact Report for the General Plan Update. Please ensure that we are included when it is sent out.

Sincerely,



Bruce G. Gallagher, Esq., President
Board of Trustees

Text added as recommended.

Noted, the SDAC will be included in the distribution to review the draft EIR.



January 6, 2009

Robert Citrano, AICP
General Plan Update
County of San Diego
Department of Planning and Land Use

Dear Mr. Citrano,

Thank you for the opportunity to comment on the County General Plan Mobility Element.

Overall I think the element is certainly moving in the right direction, with a new emphasis on bicycling, walking and transit which will ultimately benefit all our communities. I'm very encouraged at the direction the County is moving with the plan.

Specific comments:

Introduction - Purpose and Scope. I am encouraged by the focus on multi-modal transportation in the introduction and throughout the document. This is a much-needed step forward for the County and we applaud this recognition of bicycling, walking, and transit as vital transportation options. Also, in the broader vision, a plan which concentrates residential and commercial development in specific locations rather than spreading it out over the backcountry makes it easier for residents to bicycle and walk for more of their trips, improving the community, the environment, and their own health. We support this direction very much.

In Chapter 2, the inclusion of many bicycle friendly principles, including Principle 7 "Maintain environmentally sustainable communities and reduce greenhouse gas emission that contribute to climate change." Since bicycling and walking are the ultimate efficient non-pollution options, we look forward to the plan creating a transportation system that encourages and supports those modes. One edit that should be considered earlier in the chapter: "How we get around" the plan states - "Our streets and highways are connected, complete, and maintained to support use by our automobiles and trucks." We recommend this sentence be modified to read "...maintained to support use by all our road users - cars, trucks, transit, bicyclists, and pedestrians" to be consistent with the other sections of the plan.

In Chapter 4, Mobility. Thank you very much for including the consistent wording noting that roads are multi-modal.

Road Classification Descriptions: Although the wording in the Table M1.a footnote is better than before, it still implies that bike lanes are somehow 'extra' and not required in the minimum standard for roadways. The right of way needed for the road varies for many reasons. Perhaps the footnote should just be eliminated. Bicycle accommodation needs to

San Diego County Bicycle Coalition
P.O. Box 34544 San Diego CA 92163
(858) 487-6063
www.sdcbc.org

We appreciate your comments.

These comments have been noted.

Recommended revision has been incorporated.

By providing a range, DPLU is attempting to provide flexibility in how bicycle users are accommodated. This flexibility allows the paved width of the roadway to be kept to a minimum, while adequately accommodating the bicycle. Also, the Mobility Element network figures have been revised to show the requirement for bike lanes on all roads with the Boulevard classification.

RESPONSES

be included on all roadways. For some roads accommodation will mean including bicycle lanes. For others it might include traffic calming, signage and shared lane markings. For still others it will be that bicyclists will use the shoulder but it is not designated as an official bike lane. In any case, the plan needs to acknowledge that bicyclists will use all streets in the plan, and that bicycle use needs to be planned for on all roadways.

While the County Bicycle Plan does call out specific roadways to include bike lanes, the document does not consider every road, and is somewhat outdated. I hesitate to base the bike facilities in the General Plan on the existing County Bike Plan. Instead, the General Plan should analyze the roads with an eye to providing appropriate bicycle accommodation on all roadways. While many of the roadways will have shoulders that will not be utilized for parking and thus be available for bicyclists to use, it is not clear which road classifications (or specific roadway segments) will be using the shoulder space for on-street parking and will thus need some other accommodation for bicycling. For example, the six lane roadways will likely not have on-street parking, so the shoulders on those roadways will be available for bicyclists to use. The table, however, does not specify that there will or will not be on-street parking, so it is not clear whether or not a bike lane would be necessary. We ask that in either Table M1.a or the Mobility Network Appendix there be some indication of where on-street parking will and will not be allowed, and the type of bicycle accommodation on each roadway segment analyzed.

As I mentioned in my letter of July 10, Roadway Operations: Level of Service (LOS) should also measure the bicycle, pedestrian, and transit functionality of the roadway. There are several areas of the country now using bicycle LOS and pedestrian LOS measurements to more fully assess the operation of a roadway. Since so many LOS 'improvements' for motorists adversely impact bicyclists and pedestrians, including these populations in the evaluation would help provide mobility for all users. Also in this section, where the plan lists 'conditions where a failing LOS is acceptable include roads where road widening and construction would:' this list of conditions should include 'substantially negatively impact bicyclist and pedestrian circulation' at least for roadways in the town centers. The table M-3 should also note that operational improvements should not negatively impact bicyclist and pedestrian movement.

Overall, I believe that the general plan is heading in the right direction, and I look forward to working with you and your staff to make sure it fully serves the needs of everyone in the county. Thank you for the opportunity to comment. Please feel free to contact me if you have any questions or concerns.

Sincerely,



Kathy Keehan
Executive Director

The road network matrix (Mobility Element Network Appendix) has been amended to identify roads where the shoulder would be used as a parking lane, requiring additional right-of-way for a bike lane.

Table M-3 has been revised to identify where bicycle and pedestrian circulation would be impeded.

We appreciate your comments.

**San Diego County
Childhood Obesity
Initiative
Leadership Council**



RESPONSES

Nicholas Yphantides, MD
Co-chair

Wilma Wooten, MD, MPH
County of San Diego
Public Health Officer,
Co-chair

Michele Anderson
San Diego Padres

Mary Blackman
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Bob Citrano
Land Use / Environmental Planner III
Department of Planning and Land Use
County of San Diego
5201 Ruffin Road, Suite B
San Diego, CA 92123

RE: County of San Diego Draft General Plan Update

Dear Bob,

Thank you for the informative presentation you provided to the City & County Government Domain (Government Domain) of the San Diego County Childhood Obesity Initiative (Initiative). The Initiative is a public/private partnership whose mission is to reduce and prevent childhood obesity in San Diego County by creating healthy environments for all children and families through advocacy, education, policy development, and environmental change. As such, the Initiative oversees implementation of the *San Diego County Childhood Obesity Action Plan*. The purpose of the Initiative is to create, support and mobilize partnerships among multiple domains; provide leadership and vision; and coordinate countywide efforts to prevent and reduce childhood obesity. The Initiative has established active workgroups in multiple domains including government, healthcare, schools/after-schools, early childhood, community-based and faith organizations, media/marketing, and businesses to act as a forum for the development, replication, and leverage of best practices and resources. The Government Domain furthers these efforts through strategies that include: increasing walkable and bikeable communities; improving access to affordable, healthy food choices; increasing the quantity, quality and accessibility of park and natural spaces; and modifying general plans to enhance opportunities for physical activity.

We appreciate your invitation to comment on the draft General Plan Update. The Government Domain supports the draft General Plan's shift towards sustainable growth and multi-modal transportation. The movement of growth in unincorporated communities to "villages" and "rural villages" with existing infrastructure and facilities promises to reduce greenhouse gas (GHG) emissions, maintain San Diego County's unique beauty, and promote community health. The emphasis on multi-modal transportation recognizes bicycling and walking as vital transportation options. It also establishes a clear commitment to the provision of safe and adequate streets and roadways for all road users. The Initiative strongly applauds these and several other guiding principles of the General Plan including:

- Maintain environmentally sustainable communities and reduce greenhouse gas emissions that contribute to climate change
- Preserve agriculture as an integral component of the region's economy, character, and open space network
- Recognize community and stakeholder interests while striving for consensus

The County draft General Plan lays a good foundation for improving the community's health in San Diego County. The built environment can be linked positively or negatively to obesity, asthma, diabetes, and pedestrian fatality and injury rates; depending on whether communities plan for and provide compact, mixed-use development, multi-modal transportation, safe streets, sidewalks and paths, and

Noted

We appreciate your comments



RESPONSES

parcs and open-space. Research indicates that communities less dependent on automobiles suffer fewer traffic accidents.¹ Increasing evidence supports the idea that compact, mixed-use development and proximity to basic retail and services influences individuals' transportation choices. Thus, zoning can promote or discourage physical activity. A 2001 study published in the Journal of American Medical Association revealed that providing more transportation choices and other traffic control measures in the 1996 Atlantic Olympic Games reduced asthma attacks by as much as 44 percent.² Zoning can also limit or support individuals' healthy food choices. A recent report from the California Center for Public Health Advocacy states that Californians are surrounded by four times the number of fast food outlets as produce retailers.³ Ultimately, these factors all play a role in the physical health of our community and today's staggering obesity and diabetes rates.

Noted

A General Plan that places community health at its cornerstone is of vital importance in San Diego County, whereas:

- 31 percent of students in grades 5, 7, and 9 in San Diego County are overweight.⁴
- Overweight, obesity & physical inactivity cost California \$28 billion in 2005.⁵
- Pedestrian fatality rate due to vehicular collisions in San Diego County is the third highest in the nation.⁶

Noted

The Ideal "Healthy Community/Region"

Research indicates the healthiest possible community includes the following features:

- Compact, mixed-use neighborhoods are linked to each other by frequent, convenient transit services.
- Residences are within easy walking distance of parks, schools, shopping, employment, and transit stops that meet the diverse needs of local residents.
- The walking environment is safe and accessible for seniors, children, and persons with disabilities.
- To maximize personal safety, the principles of Crime Prevention through Environmental Design are evident, providing "eyes on the street."
- Most neighborhood streets are designed for low speed (20-30 mph).

Noted

¹ Cryer, Stacey, & Helland, Linda. (2008, November 18). Mendocino County General Plan Update [Letter to County of Mendocino Planning Team]. Accessed at <http://www.co.mendocino.ca.us/planningteam/pdf/cty%20of%20hhsa.pdf>

² Friedman, M., Powell, K. E., & Hutwagner, L., Graham L. M., Teague W. G. (2007, January). Impact of Changes in Transportation and Commuting Behaviors during the 1996 Summer Olympic Games in Atlanta on Air Quality and Childhood Asthma. *JAMA*.

³ California Center for Public Health Advocacy. (2007, January). Searching for Healthy Food: The Food Landscape in California Cities and Counties.

⁴ Community Health Improvement Partners. (2007). Overweight, Obesity, Physical Activity and Nutrition. San Diego County Health Needs Assessment. Accessed at http://www.sdchip.org/publications/needs_assessment/pdfs/5k-Overweight-and-obesity-profile.pdf

⁵ California Department of Health Services, & Public Health Institute. (2005, April). The Economic Cost of Physical Inactivity, Obesity, and Overweight in California Adults: Health Care, Worker' Compensation, and Lost Productivity. Accessed at:

<http://www.cdph.ca.gov/HealthInfo/healthyliving/nutrition/Documents/CostofObesityToplineReport.pdf>

⁶ Surface Transportation Policy Project. (2004). Mean Streets. Retrieved at <http://www.transact.org/report.asp?id=235>



RESPONSES

- Communities have adequate street tree coverage and green space.
- Residents have ready access to healthy food choices (farmers' markets, community gardens, full service grocery stores).

Suggested changes

To bring the County of San Diego even closer to this ideal of a healthy community and region, the San Diego County Childhood Obesity Initiative would like to suggest the following language changes and policy inclusions in the draft General Plan:

Implementation

- Establish a standing committee of health and other key stakeholders to advise and assist the County with implementing the General Plan vision and policies around safe, healthy and multi-modal communities.

As identified in the Implementation Plan, staff is considering establishing an advisory group to support implementing the updated General Plan. [See Implementation Measure 1.2.1.F Advisory Group]

Vision

- Vision- Incorporate and define a comprehensive description of "liveable communities"

Description of livable communities has been expanded.

The American Institute of Architects states that liveable communities have eight essential components--many of which are core principles of the draft General Plan, including: a sense of place, mixed-use development, density, effective planning for regional transportation, street-savvy design, physical health and community design, public safety / personal safety, and sustainable development.⁷

Revised as recommended

- How We Get Around- Modify "Our streets and highways are connected, complete, and maintained to support use by our automobiles and trucks" to "...support use by all road users—cars, trucks, transit, bicyclists, and pedestrians".

Changing this makes the Plan consistent with other sections of the document, including the stated vision for healthy and safe physical environments.

Revised

- Guiding Principle 2- Change to "Promote health and sustainability by locating new development near existing infrastructure, services, and jobs".

Research published in the American Journal of Public Health indicates that individuals in more compact, walkable San Diego communities are more fit and get more physical activity than individuals in less walkable neighborhoods.⁸

Land Use Element

Added

- Include "health and well-being" as a concept promoted by locating new development near existing infrastructure, services, and jobs.

⁷ The American Institute of Architects. What Makes a Community Liveable? Livability 101. Retrieved at http://www.aia.org/SiteObjects/files/Liv_F_AIALivability101_streetsavvydesign.pdf

⁸ Saelens B. E., Sallis J. F., Black, J. B., et al. (2003) Neighborhood-based differences in physical activity: an environmental scale evaluation. American Journal of Public Health. 93, 1552-8.



RESPONSES

- LU- 17- Include a new policy to "Promote joint-use projects and programs including afterschool programs, public libraries, physical activity facilities, and farmers' markets in partnership with school districts".
- LU- 17- Include a new policy to "Seek funds for and promote safe routes to school through school district and community partnerships".
- LU- 17- Include a new policy to "Promote community and student garden space on school facility grounds".
- Include a new goal "Supporting Healthy Food Environments: Apply land use strategies that assure all residents have access to healthy, affordable foods and reduce hunger and obesity through the consumption of locally grown fruits and vegetables".

This could also be included as part of a new "Community Health and Wellness" element that defines and maps the community vision for promoting community health through land use and development. This framework should include: recreation and open space, food access and nutrition, medical services, public transportation, equitability, affordable housing, economic opportunity, completeness of neighborhoods, safe neighborhoods, and environmental quality.⁹ Several of these aspects are already covered in the General Plan, but specific language would strengthen understanding of policies and goals relating to community health and healthy community development.

- Include the following associated policies:
 - Support, as relevant with the use of planning tools, the integration in food production and distribution of sustainability principles and practices which promote clean air, water, healthy soils and healthy habitats and ecosystems.
 - Support comprehensive food planning processes at the community and regional levels.
 - Develop land use and transportation plans and help prepare economic incentive programs to provide accessible and well-serviced sites and other development assistance for year-round public markets, farmers' markets, small-scale processing facilities and distribution centers for food produced in the region.
 - Promote—through the application of relevant planning tools— grocery stores, healthy corner stores, farm stands, farmers' markets, and community-supported agriculture drop off sites in areas deficient in healthy food options.
 - Identify grocery, healthy corner stores, farm stands, and farmers' markets as a priority for economic development.
 - Encourage convenience stores, liquor stores and ethnic food markets to carry fresh produce.

While staff agrees with this concept, it does not agree that a policy is appropriate in the General Plan, which is land use focused.

This is included in the Implementation Plan. [See Implementation Measure 4.4.5.A Non-County Funding Programs]

While the concept is worthy, this is outside the County's jurisdiction and too specific for a General Plan.

Policy COS-5.1 in the Agricultural Resources section of the Conservation and Open Space (COS) Element indirectly addressed access to locally grown food through its support of roadside stands and farmers markets.

DPLU appreciates COI's concerns with health and wellness. However, it disagrees the need to address this level of detail and complexity in a General Plan for the physical development of the County.

⁹ City of Richmond. (2007). Richmond General Plan Update: Community Health and Wellness.



- Encourage new food retail development to accept cash, Electronic Benefit Transfer (EBT), and WIC.
 - Encourage farmers' markets to accept credit and EBT cards; Women, Infants, and Children (WIC) benefits; and Senior Farmers' Market Nutrition Program coupons.
 - Support agricultural practices and land use that affirmatively and proactively address worker health and safety.
 - Support the development of food systems that preserve and sustain the diverse traditional food cultures of Native American and other ethnic minority communities.
 - Assist in assessing the region's potential food needs during emergencies of different kinds (such as major earthquake, fires, terrorist attack, etc.) and the capacity of current food sources and distribution systems.
 - Support and promote urban agriculture on publicly owned, non-contaminated vacant land in "villages" and "rural villages".
- Include an "Encourage healthy eating habits and healthy eating messages through environments that support healthy living" objective.¹⁰
 - Incentivize healthy outdoor advertising zones in certain geographic areas (such as around schools).¹¹
 - Encourage restaurants to post nutrition information for menu items on menu boards and menus.¹²
 - Consider limiting food vending vehicles on a public street within 500 feet of any school, faith community, or park property boundary during high traffic hours.¹³
 - Offer incentives for restaurants that serve healthy food options, adopt menus consistent with dietary guidelines, and/or serve locally grown foods.¹⁴

Mobility Element

- Require Level of Service (LOS) standards to include measurement of bicycle, pedestrian, and transit functionality of the roadway.

Several communities throughout the country have begun to incorporate bicycle and pedestrian measurements as a means to more thoroughly access the operation of a roadway. The inclusion of

RESPONSES

The recommended policies in this section are outside the purvue of a General Plan.

See response above.

While staff recognizes the intent, DPLU does not feel that the level of effort that would be required for this would equal the benefit. This is more appropriate in urbanized communities where there are more non-vehicular users of roadways. Staff feels that Community Plan should address any specific issues where a substantial number of bicyclists and pedestrians would require additional capacity of the bicycle and pedestrian facilities.

⁹ Public Health Law & Policy, Raimi + Associates. (2008). How to Create Healthy General Plans.
¹¹ Public Health Law & Policy, Raimi + Associates. (2008). How to Create Healthy General Plans.
¹² Public Health Law & Policy, Raimi + Associates. (2008). How to Create Healthy General Plans.
¹³ Chula Vista, CA. Health and Sanitation Ordinance 2729 § 1 (1998)
¹⁴ Public Health Law & Policy, Raimi + Associates. (2008). How to Create Healthy General Plans.



RESPONSES

these elements is of particular importance since so many traditional (i.e. motorists) LOS improvements negatively impact bicyclist and pedestrians. A 1993 Federal Highway Administration study reports that bicycling and walking improve health; reduce traffic congestion and noise and air pollution; and dependency on automobiles.¹⁵

- Include a new policy to "Provide an adequate portion of the transportation budget to pedestrian and cyclist amenities".
- Include language that ensures operational improvements do not pose negative impacts on bicycle and pedestrian movement.
- Include language that ensures pedestrian routes and sidewalks are integrated into continuous networks.

Conservation and Open Space Element

- COS- 6.1- Include a new policy to "Support the development of regional infrastructure that can process and distribute locally grown produce for institutions such as hospitals, schools, and universities".
- COS- 6.1- Include a new policy to "Support the creation of marketing network to bring together farmers, processors and purchasers of locally grown and produced foods".
- COS- 6.5- Include a new policy to "Develop regional plans and policies that strengthen markets for the region's food producers so as to reduce long distance transportation of agricultural products".
- COS- 6.5 - Include a new policy to "Assess the impact of food waste and landscaping disposal on area landfills and explore possibilities for recycling through composting".

Thank you for the opportunity to comment on the County of San Diego draft General Plan Update. Please contact me with any questions at 619.523.2001 or cmoder@hasdic.org.

Sincerely,

Cheryl Moder

Cheryl Moder
Director
San Diego County Childhood Obesity Initiative

Staff agrees with this concept, but feels that this is addressed through the policies that require the provision of complete streets and the provision of bicycle and pedestrian facilities in development.

Policy M-9.1 has been revised to include this.

Staff feels that this has been addressed in numerous policies that require the accommodation of bicycles and pedestrians (M-4.1, 4.3, 8.4, 8.5, 11.1, 11.2, 11.6, 11.8).

DPLU appreciates the concepts expounded by the new recommended policies (6.1 – 6.3). However, it disagrees the need to address this level of detail and complexity in a General Plan for the physical development of the County.

Similar policies are included in the COS Element (see COS 17.1, 17.3, 17.4)

¹⁵ (1993, January). The Environmental Benefits of Bicycling and Walking. *Federal Highway Administration Case Study*, 15.



San Diego County Fire Chiefs Association Fire Prevention Officers Section

RESPONSES

January 5, 2009

General Plan Update, DPLU
5201 Ruffin Road, Suite B
San Diego, CA 92123

Comments: Fire Districts -Fire Marshal comments on the San Diego County draft General Plan

The following are areas that need to be address in more detail which we believe will assist in planning tools for fire protection in San Diego County.

Chapter 3 Land Use Element

Policies LU-13.1 and LU-13.2 plan to *coordinate land use planning with Fire Protection and domestic water infrastructure planning to maintain an acceptable availability of a high quality water supply and require new development to identify adequate water resources to support the development prior to approval. Well water may not be adequate in years to come.* When is a proposed development outside of a water district or company required to install a water system as a condition of the project's approval? The water system should include firefighting water duration, domestic use, outside water needs and emergency standby water based on lot size or density and recognized firefighting standards (NFPA, California Fire Code etc)? TPM or TM? A water system is always preferred over individual wells and storage tanks—water systems provide a greater quantity of water and individual water tanks cannot be relied upon to always be filled. As development continues in the backcountry, coupled other conditions such as an extended drought, the aquifers of the County might not be able to support the increased development, leaving areas with no water supply to suppress fires.

Chapter 4 Mobility Element

M-3.3 Multiple Ingress and Egress. Require development to provide multiple ingress/egress routes whenever feasible required in conformance with State law, the Fire Code, and the Safety Element. (Pg 4-14)

Mobility policy M-4.4 requires: *Design and construct public and private roads to allow for necessary access for fire apparatus and emergency vehicles accommodating outgoing vehicles from evacuating residents.* Does this include a requirement that all new public and private roads be paved? Current private road standards allow for an exemption to the paving requirement for some land use designations, which has allowed for much of the County's fire apparatus access roads to be lacking in an adequate all-weather surface.

The County acknowledges that providing adequate water supply, volume and pressure is crucial to properly fight fires either at an individual home or the surrounding neighborhood. As a general rule, a municipal water supply (waterlines and hydrants) is always preferable to on-site tanks. However, when this is not feasible, the state and county fire code currently provide minimum water requirements for projects located outside established water districts. Furthermore, all discretionary projects (e.g. subdivisions regardless of size) must have an approved Fire Protection Plan (FPP) prior to approval of the development project. The purpose of the FPP is to assess the potential impacts resulting from fire hazards and identify the measures necessary to adequately mitigate those impacts. As part of the assessment, the plan must consider the property location, topography, geology, combustible vegetation (fuel types), climatic conditions, and fire history. The plan must address water supply and pressure, access (including secondary/emergency access where applicable), structural ignitability and fire resistive building features, fire protection systems and equipment, impacts to existing emergency services, defensible space, and vegetation management. The plan must also identify and prioritizes areas for hazardous fuel reduction treatments and recommend the types and methods of treatment that will protect one or more-at-risk communities and essential infrastructures. The plan must also recommend measures that property owners will take to reduce the probability of ignition of structures throughout the area addressed by the plan. The FPP is prepared in conjunction with the Fire Authority Having Jurisdiction (FAHJ).

M-3.3. County appreciates your comments and will amend the Policy M-3.3 as follows: "Require development to provide multiple ingress/egress routes ~~whenever feasible~~ in conformance with state and local regulations."

M-4.4. The current state and County fire code regulations and County Road Standards include specifications for road width, grade and surface type requirements. Deviations from these requirements/standards must be approved by the County and Fire Authority Having Jurisdiction prior to approval of the new development project. There have been cases where deviations from the standards are necessary in order to achieve access in areas that have topographical and geographical constraints. The deviation provisions provide the FAHJ with the flexibility in developing solutions that recognize unique site characteristics while ensuring safe evacuation for fire fighters and citizens.



San Diego County Fire Chiefs Association Fire Prevention Officers Section

We would like to see the exemption to paving be removed from the road standard. 15 of the 16 fire protection districts in the County have attempted to fix this problem through their fire code by requiring all fire apparatus access roads be paved.

Chapter 7 Safety Element

Figure S-1 - The Fire Hazard Map labeled as Figure S-1 appears to be out of date and should be replaced with the most recent Fire Hazard Map using a 2007 or 2008 data set.

Safety policy S-6.3 would require new development to make a fair share contribution for the provision of fire and emergency services. However, this contribution can only be for capital projects and not for ongoing operation and maintenance costs.

Policy LU-12.2 on page 3-38 would also require new development to maintain (and not degrade) existing service levels. How would operation and maintenance costs for fire and emergency services be funded? At best, policy S-6-3 is unclear with respect to funding for ongoing costs. Therefore, the County should amend the policy to include an explicit provision for funding ongoing costs for fire and emergency services so that service levels for existing developed areas would not be degraded.

Policy S-6.4 states:

Require that development demonstrate that fire services can be provided that meet the minimum travel times identified in Table S-1 (Travel Time Standards).

Travel times, even though they are used in the Existing General Plan, are not the appropriate measurement for fire protection services. The appropriate measurement is **response times**, which are described on page 7-7. Travel times do not include 'reflex' time (the time from when the 911 call is received to when the fire engine leaves the station, note reflex times can vary from 2 to 5 minutes depending on the agency responding.). Therefore, there is no way to determine if the travel time will meet the intended purpose described in Table S-1. Please revise policy S-6.4 and Table S-1, working in conjunction with the fire service to achieve the intended purpose, using response times.

As defined in the Consolidated Fire Code **RESPONSE TIME**. The elapsed time from the fire department's receipt of the first alarm to when the first fire unit arrives at the scene.

The Fire section of the Safety Element should include an exhibit showing the preferred locations of future fire stations based on future population growth. Station locations would not be parcel specific, but instead indicate a general location using response times from the station to population centers.

RESPONSES

Figure S-1. The County appreciates this comment and will make sure that the most current Fire Hazard Map is incorporated into the General Plan prior to decision by the Board of Supervisors on Fall 2010.

S-6.3 / LU-12.2. The County appreciates your comment; however, the policy does not limit contribution to only capitol projects. The requirement that development contribute its fair share contribution towards funding the provision of appropriate fire and emergency medical services as determined necessary to adequately serve the development includes not only construction costs, but ongoing operation and maintenance costs. O&M costs could be funded by a Melo Roos; additional information is provided in the Implementation Plan. [See Implementation Measure 6.2.3.C Fair Share Contribution]

S-6.4. As part of the Fire Protection Plan, the applicant must describe the current level of fire and emergency medical services being provided and how the new development project will impact that level of service. If it is determined that the project will have a significant level of impact, the project must adequately mitigate to the satisfaction of the County and FAHJ. However, the policy is designed to ensure that new development "pays its own way" for all service impacts; not just impacts on fire and emergency medical services. As such, it is important to provide flexibility on how that can be accomplished.

The County appreciates your comments and understands your concerns. Although "Response Time" may be a more accurate measurement there are currently no documented or published standards for response time. Furthermore, there is no agreement in the fire community on what the appropriate response time should be; suggested response times fluctuate not only between districts, but between fire stations. Travel Time requirements have been in place for a number of years and there are national standards available to estimate the time (NFPA 1142 Table C.1.11(b)). Until standards are developed and agreed upon by the fire community, the County must continue to rely on the travel time measurement.



San Diego County Fire Chiefs Association Fire Prevention Officers Section

Additionally, the current fire stations (all fire stations, city, fire district, volunteer federal state etc.) and any projected fire stations should also be mapped so as to reduce any conflicts' in station locations, example, and fire station across the street from each other.

Moreover, in the grey text box following Policy S-6.4 it states: *"Fire stations must be staffed year-round, publicly supported, and committed to providing service. These do not include volunteer stations, seasonal fire stations, and stations that are not obligated by law or agreement to automatically respond to an incident."* There are many volunteer stations that are staffed year-round, publicly supported and committed to providing service. This is true of many seasonal stations as well—the County has contracts with CAL FIRE to keep many "seasonal" stations staffed year-round. The first sentence in the above quotation should remain, and the second sentence should be deleted. It should provide for exception based on current situation.

Access/Egress Routes: Multiple access/egress routes are desirable. Where such multiple routes are unavailable or infeasible, design, construction, and fuel management should be considered to achieve the overall same practical affect. Require development to include multiple access/egress routes when necessary to ensure adequate fire safety (Page 7-7)

Travel Time Standards: The minimum travel time standards to respond to a fire hazard or medical emergency facilitate the ability to identify future fire facility needs and to determine public service requirements for proposed development. Travel time standards indicate that expectations for service levels are different in urbanized areas than in rural areas. (Page 7-7)

Multi-Story Structural Fires: The ability of rural fire protection districts to safely fight structural fires above ~~three~~ two-stories is an issue in rural locations when higher density multi-family residential developments are needed to provide affordable housing or alternate housing types, since the rural fire protection districts simply do not have the resources to fight multi-story structure fires. (Page 7-7)

Goals and Policies

S-3.3 Minimize Flammable Vegetation. Site and design development to minimize the likelihood of a wildfire spreading to structures by limiting pockets, peninsulas, or islands of flammable vegetation within a development. Pockets, peninsulas & islands of flammable vegetation should not be allowed in a development. (Pg 7-8)

S-3.5 Secondary Access. Require development to include secondary access when necessary to ensure adequate fire safety. ~~Where multiple routes are unavailable or infeasible in development, ensure that the same practical affect is achieved through site design, construction, and fuel management.~~ (Pg 7-8) Note: The same practical effect is not possible when comes to secondary access.

RESPONSES

The County appreciates the comment and feels that this could best be addressed in the individual community plans. The County anticipates that work on the community plans will start once the General Plan has been adopted by the Board of Supervisors in Fall 2010.

You are correct that the county contracts with CAL FIRE to ensure that certain seasonal stations are staffed 24/7, 365 days a year. Furthermore, the County Fire Authority (CSA 135) relies on these volunteers and volunteer agencies to provide fire and emergency medical services in the rural backcountry. The text box on page 7-9 will be amended as follows: ~~...These do not include volunteer stations, seasonal fire stations, and stations that are not obligated by law to automatically respond to an incident...~~

The County agrees and will make the language change on page 7-7 as proposed.

The County agrees and will make the language change on page 7-7 as proposed.

County appreciates your comments and will amend the section on Multi-Story Structural Fires as follows: ~~"...fight structural fires above three stories~~ with multiple stories ~~is~~ may be an issue..."

County appreciates your comments and believes that Policy S-3.3 already addresses your concerns related to pockets, peninsulas and islands of flammable vegetation.

County appreciates your comment, but disagrees with your statement that there is no mitigation that will result in "same practical effect" for lack of secondary access. Current state and local fire code requirements specify maximum dead-end road lengths. Secondary access is a logical mitigation for this requirement, but due to topographical or geographical conditions, may not be feasible in all situations. In practice, depending upon the site and existing conditions, there have been cases where the Fire Authority Having Jurisdiction has found other acceptable mitigation measures for dead-end roads including emergency access only roads and proportionate improvements to the primary access road.



San Diego County Fire Chiefs Association Fire Prevention Officers Section

RESPONSES

S-3.6 Mitigation Fire Protection Measures. Ensure that development located within high to extreme fire threat areas implement measures that reduce the risk of structural and human loss due to wildfire. (Pg 7-8)

The County agrees and will make the language change to Policy S-3.6 as proposed

GOAL S-4

Managed Fuel Loads. Managed fuel loads, including ornamental and ~~wildland~~ combustible vegetation, ~~in areas of wildland/urban interface.~~ (Page 7-8)

The County agrees and will make the language change to Goal S-4 as proposed.

COS-23: Add a policy:

CS-23.4 Public Safety Involvement. Coordinate with public safety agencies to address safety concerns. (Page 5-39)

The County agrees and will add the policy as proposed.

If you have any further questions please feel free to contact me at 858-756-6040 or email at hunter@rsf-fire.org.

Respectfully submitted on behalf of the Fire District Fire Marshals,

Clifford F. Hunter
Chairman
Fire Marshal Section

CC: Fire Districts: Alpine, Bonita-Sunnyside, Deer Springs, Lakeside, North County, Rancho Santa Fe, San Marcos, San Miguel, Valley Center, Vista.

BRANDT-HAWLEY LAW GROUP

Environment/Preservation

RESPONSES

Susan Brandt-Hawley

Chauvet House PO Box 1659

Legal Assistants

Glen Ellen, California 95442

Sara Hews

Shannen Jones

January 16, 2009

Devon Muto, Chief of Advanced Planning

Department of Planning and Land Use

County of San Diego

Department of Planning and Land Use

5201 Ruffin Road, Suite B, San Diego, CA 92123

by email: gpupdate.dplu@sdcounty.ca.gov, devon.muto@sdcounty.ca.gov

Subject: Comments on Draft General Plan

Dear Chief Muto:

These comments on the treatment of cultural and historic resources in the San Diego County Draft General Plan 2020 are submitted on behalf of Save Our Heritage Organisation. While there is much to commend in the GP2020 update and SOHO appreciates the appropriately programmatic nature of a general plan, the updated plan should include feasible provisions at just such a programmatic level that will reasonably protect the County's unique resources in the upcoming decade.

SOHO has weighed in early in this update process to request significant improvement of the general plan to encourage the preservation and restoration of cultural and historic resources essential to the County's economy, health, and quality of life and as an important element in the County's effort to reduce greenhouse gases. The efforts made by the City of San Diego in its recent general plan update are instructive:

<http://www.sandiego.gov/planning/genplan/pdf/generalplan/adoptedhpelem.pdf>

Since the County, like the City of San Diego, is a Certified Local Government, as part of its ongoing qualification for CLG status it must comply with the same CLG requirements outlined in the City's Historic Preservation Element.

To honor the County's CLG status and to proceed in accord with its requirements and those of the California Environmental Quality Act, the County should mitigate for the increasing pressure on historic resources caused by anticipated intensive new development in its historic town centers. Here are some proposals for feasible

The County is pleased to have worked with SOHO in a collaborative manner in the development of the general Plan Update and its policies related to the preservation of historical resources.

programmatic plan provisions consistent with other agencies' general plan policies:

Demolition Review: All permits materially affecting properties 50 years or older must be reviewed by qualified County staff and/or the County's Historic Site Board to determine if the subject property meets qualifications for inclusion in the County's register of historic sites. The County is the only major jurisdiction in our region that is currently without this process. A 50-year threshold of review is consistent with the CEQA Guidelines and the requirements of the California Register of Historical Resources and the National Register of Historic Places. All permits affecting cultural resources need to be reviewed by qualified staff and or the HSB to ensure compliance with the appropriate *Secretary of the Interior's Standards* for the contemplated project affecting the resource; *i.e.* rehabilitation, restoration, reconstruction etc.

Consultation: As part of the permit review for any project affecting a potential cultural resource, individuals and groups with expertise need to be consulted for purposes of determining the significance of the resource. These individuals and groups include but are not limited to historical societies, preservation groups, Native American groups, and knowledgeable local individuals.

Penalties need to be implemented for the unlawful demolition of cultural resources without permits. A fine should be levied equal to the cost of reproducing the resource as determined by a qualified preservation architect. Fines should be used for restoration/reconstruction of the resource or, if not feasible, should go into a fund administered by the HSB to benefit historic preservation projects.

Survey: As part of the general plan update process, a survey of the County unincorporated area needs to be completed to identify potential historic resources to aid in the planning process for future development and for disaster response planning.

Additional incentives need to be developed and implemented as part of the update to encourage retention and restoration of our cultural resources.

SOHO representatives would be happy to meet with you and County staff to discuss any of the issues we have raised in this response to the draft EIR. Thank you for the opportunity to comment on this extremely important update to the general plan.

Sincerely yours,

Susan Brandt-Hawley

cc: James Royal, Chair HSB, jwroyal@cts.com
Glenn Russell LEUG PM, grussell@sdcounty.ca.gov

RESPONSES

Demolition Review. Applications for discretionary permits on sites that contain structures 50 years or older are reviewed by County staff historians and evaluated pursuant to CEQA Guidelines as well as the requirements of the CA Register of Historical Resources and the National Register of Historic Places. Applications for ministerial permits, such as demolition permits, currently undergo minimal review for historic resources. The County proposes to initiate a new effort to identify and catalog historic and potentially historic resources within the unincorporated County. This process will require public participation and evaluation by County staff and the Historic Site Board. The anticipated result of this effort is: (1) at minimum, better inform landowners of potential resources on their properties and options available to them under the State/National Register or the Mills Act; and (2) in some cases, properties may be zoned with a special area designator for historic resources, thereby restricting demolition/removal and requiring a Site Plan permit for proposed construction which will be reviewed by the Historic Site Board.

Consultation. The County agrees with this comment and will continue to initiate such consultations for discretionary projects. In addition, the County welcomes the opportunity to consult with any specific local groups or individuals who wish to participate in the early screening process for projects.

Penalties. DPLU investigates any known or reported case of land-use or building code violation within its authority. For example, if a person were to move a few hundred cubic yards of soil on a property without a grading permit, this would constitute a grading violation. As part of the investigation, the County attempts to determine forensically whether or not any cultural resources have been adversely affected; and if so, requires mitigation. A monetary fine may serve as mitigation only if it clearly serves to mitigate the adverse effect. It should be noted that any damage, unlawful or otherwise, of cultural resources that does not involve building code or land-use violations would be outside the jurisdiction of DPLU.

Survey. The County agrees and several community surveys already exist that identify historic properties and alert County staff to the presence of potential historic or cultural resources prior to development. The County also uses the CHRIS database to screen sites for potential impacts as part of discretionary review. While it may not be feasible to evaluate all un-surveyed areas in the unincorporated County at this time, the County plans to participate in additional surveying efforts through available grants and as part of discretionary project reviews.

Additional Incentives. The County will continue to utilize the Mills Act property tax reduction program. In addition, the draft GP includes numerous policies encouraging the protection and restoration of cultural resources. The County welcomes any additional suggestions for incentive programs.

S.O.R.E.
(Save Our Rural Economy)
P.O. Box 455
Campo, CA 91906
(619) 478-1023

RESPONSES

January 15, 2009

Eric Gibson, Director
Devon Muto, Chief of Advanced Planning
COUNTY OF SAN DIEGO
Department of Planning and Land Use
5201 Ruffin Road, Suite B
San Diego, California 92123

Re: Project Name: Draft General Plan; General Plan Update
Subject: Comments on Draft General Plan

Dear Mr. Gibson and Mr. Muto:

The comments set forth below concerning the Draft General Plan Document/General Plan Update (hereinafter "GPU") are being submitted by S.O.R.E. (Save Our Rural Economy).

S.O.R.E. consists of a grassroots group of residents, property owners and concerned citizens of San Diego County who have watched in amazement for the approximate past decade as the County has suffered its residents and employees through this GPU process. S.O.R.E. believes that the GPU is necessary and that it is not too late to save the plan from its fatal flaws. In fact much of the work that has been done has been valuable and is still relevant, only under the new and different assumptions of 2009. The GPU could still be an opportunity for the citizens of San Diego County to make their county a better place to live, work and play. However, the plan needs to change its primary focus from the environment back to the citizens it is intended to serve. It needs to be more responsive to the economic realities of today and tomorrow. That is not to mean that it should not be sensitive to the environment, but it must do so without harming or failing the people of San Diego, or putting our rural communities in economic peril. S.O.R.E. would like to work with DPLU to correct the indiscriminate downzoning and other flawed aspects of the GPU that we believe will destroy many of the small rural communities in eastern San Diego County.

It is well known that the rural areas of eastern San Diego County have the highest incidence of unemployment and lowest average per capita incomes in the County. The people of the back country are particularly vulnerable to turns in the economy, such as the one we are experiencing now. Economic circumstances that families in other parts of San Diego County are able to weather are much more difficult in east San Diego County rural communities like Potrero where the median income of a family is half that of the average for the County (\$29,531 vs \$58,960) and up to a quarter of the families live below the poverty line. Local jobs are scarce, and commutes long. Many families are unable to take care of all of their current financial

The Department of Planning and Land Use does not concur that there are "fatal flaws" in the General Plan Update. First, the General Plan Update accommodates a reasonable amount of population growth, based on initial population build-out targets developed by the Community Planning and Sponsor Groups in 1998. These community driven targets were requested by and supported by the Board of Supervisors. Following the population targets the County of San Diego staff worked with the Community Groups, stakeholders and property owners to develop land use scenarios using established criteria that included assigning density based upon characteristics of the land, reduction of public costs and location of growth near infrastructure, services and jobs.

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obligations, as is evident by the fact that Campo, percentage-wise, has been the most impacted area in the entire county by sub-prime mortgage foreclosures and lost homes. They are also the hardest hit when cost of fuel rises, as we know it will again.

S.O.R.E. believes that the current economic climate calls for economic incentives on the part of Government throughout America, but especially in places where people are hardest hit. We strongly feel that in the midst of this historic economic downturn, that all Government, but particularly County Government, should be doing all that they can to CREATE economic stimulus. This is especially true on behalf of the small band of hearty, but vulnerable residents (20,000) who inhabit our most rural Back Country communities of North Mountain, Central Mountain, Mountain Empire, Julian, and Desert. For any new general plan to be adopted in these times, it must be relevant to the "entire county", including these people, and must reflect today's circumstances even as it provides guidance for the future. Therefore, this is NOT the time for the County to randomly strip away property values and virtually eliminate any potential development rights from these five rural communities, who happen to lie entirely "East" of the "Imported Water Line"... when this land is the only thing of value many of these property owners have left. If there was significant growth pressure to develop the back country, there might be a reason to re-think the rural densities. There is NOT any real threat to over-develop now, nor has there been in the recent past. That's why the population remains well below the targets set by the current 1979 General Plan. To develop in rural areas takes more effort and capital than most prudent investors would willingly commit, unless there is a clearly defined need and community based support. We would encourage the County to reinstate some or all of the deleted rural density, and also create additional "special density bonus" or "stimulus incentives" to encourage private investment to provide needed infrastructure in rural areas that the county is unable to provide with public funds.

S.O.R.E. believes the County should be taking the lead in encouraging economic recovery in many of the small rural east San Diego County communities rather than pursuing a plan update aimed to place additional obstacles in the way of self-sufficient, sustainable rural communities. We strongly recommend you consider helping to lead our regional economic recovery through the GPU. The unincorporated county of San Diego historically has provided approximately 16% of all new area housing, with the remaining 84% being provided by the cities. Although the County's past role in housing has been relatively minimal, this will necessarily change over time. Many of the cities are now reaching their physical limits to accommodate additional growth. Either new cities need to emerge or the County will have to assume a greater role in the region's housing plans for the unincorporated areas. The GPU should be seriously considering how to help make this region more economically prosperous, even as it addresses our expanding (and aging) population needs that require access to more

Noted

The proposed General Plan Update Land Use Maps will implement a redistribution of growth over the existing General Plan, but addresses many of the concerns about the existing rural economy and services outlined in your letter by using a smart growth concept that could make the provision of services and jobs within the Rural Villages more feasible. This method of growth would also be more effective in reducing water use, creating defensible space for fire safety, and increasing the propensity of residents/seniors to walk or use other methods of transportation; all agreed upon by S.O.R.E and the Department of Planning and Land Use to be positive attributes in a community. Furthermore, the mapping provisions of the General Plan Update designated properties with densities that are reasonably attainable when environmental and physical concerns are considered, giving the County and property owners a solid foundation to predict and plan for growth. The land use alternatives meet or exceed the population targets established early in the General Plan Update process, and are within the range for future units estimated by the San Diego Association of Governments (SANDAG) and required for housing supply by the State of California in its Housing Element laws.

Noted, however studies have shown that residential development does not pay for itself, with \$1.42 in public expenditures for every dollar generated in tax revenues. These studies also show that these costs are 74 percent greater for low-density semi-rural development, commonly found and allowed in our backcountry communities today. The General Plan Update recognizes that continuing to develop in this fashion is not economically or environmentally feasible for the County of San Diego or other agencies that provide service to the unincorporated County.

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reasonably priced affordable housing. Urban development is expensive and not always compatible with the needs of seniors or young families. The County's GPU talks about encouraging rural land to be used efficiently but then negates the concept by stripping all reasonable economic value from the land, and proposing to establish minimum parcel sizes 40, 80 and even 160 acres. This is bad economics and is only going to lead to continued sporadic "rural sprawl" on large disassociated parcels, each with its individual well(s) tapping the fragile groundwater and aquifers. That kind of development is not compatible for achieving "sustainability of resources" including land, or for providing our "mobility-challenged" seniors or new families safe living accommodations. S.O.R.E. believes this must be corrected in a revised version of the GPU before it goes to final hearing.

S.O.R.E. believes that sensible plan implementation is critical to the rural areas. Walkable, sustainable communities make sense for both the urban and rural communities alike. The only difference is the scale of "main street." S.O.R.E. would also encourage the County to push forward with the "conservation subdivision" concept now, and use it in conjunction with sustainable cluster development by identifying the appropriate locations for new "incubator" villages and new places for population centers to form and grow. Rather than downzoning east San Diego County, the County's responsibility should be to set policies that encourage the creation of the next generation of rural villages, not discourage them, as the current GPU draft seems to do. Modest, appropriately sized rural villages, where businesses and residents can prosper, should be allowed to form and operate their own mutual water and wastewater systems, or to be supported by a county service district organized to provide those services. Even the smallest of rural villages must abandon the individual wells and septic systems, and be permitted the opportunity to use modern "clean water" technology, through communal applications. These investments not only would bring some jobs back to the community, but would be a huge step toward improved health, better resource conservation and true sustainability.

S.O.R.E. believes the County must rethink implementation strategies in the rural east San Diego County. With San Diego County having the "governing authority" over approximately 2.3 million acres of land, it is effectively the custodian of this land. Therefore, it is incumbent upon the County to manage this fiduciary responsibility honestly and fairly. The relatively small number of people now living in the back country need just as much a chance to enhance the quality of their lives as those living in the urban centers. This includes tribal communities on federal trust lands in the eastern areas of the County. Unfortunately, they have not been well represented, nor are they a big voting bloc, so the GPU, as it now stands, has failed miserably to consider "rural areas" for the same opportunities that are being offered to the urban and non-rural areas. The plan, as drafted, would send virtually all new compact development to communities west of the imported water line. On a smaller scale, the same new compact development is needed in rural places as well and would be desirable and appropriate.

The GPU does not establish minimum parcel sizes, rather proposes to decouple parcel size from density to make it easier for property owners to develop their land. Also, see comment above concerning the mapping provisions of the GP Update, which designated properties with densities that are reasonably attainable when environmental and physical concerns are considered.

DPLU is currently working with stakeholders to build consensus and implement the Conservation Subdivision Program.

It is the opinion of staff that the land use maps, and associated downzoning provisions were developed systematically in a manner that more appropriately shows real development potential after constraints and regulations are considered, but DPLU also believes that there are opportunities for additional study and future General Plan Amendments to land use designations within the GP Update framework, an example of such with what was proposed in the Draft Campo / Lake Morena Special Study.

See above response. Also, Tribal governments have been consulted in the General Plan Update process. Existing facilities and future plans, when available, for Tribal lands have been incorporated into traffic and environmental analysis and planned for based on resources available and the planning principles endorsed by the Board of Supervisors.

This would be the fair thing for rural citizens; for which the plan as presently proposed does not effectively allow. S.O.R.E. requests the County conduct additional public meetings to find ways to reintroduce compact development opportunities throughout our backcountry. It's well known that properly planned, walkable communities (even in rural areas) greatly increase the health of residents, reduce the impact of cars on the environment and create an economic stimulus within their service area boundaries, making long commutes less unnecessary. Rural families shouldn't be denied this opportunity because of an oversight or design. Unfortunately, these new communities will only be built if there is enough economic value and density in the rural village plan to warrant the large private investment typically needed to make it happen. The GPU's severe density reductions are an impediment that will have to be addressed if compact development is to be economically achievable. Without specifically encouraging these next generation of hamlets and villages in the new GPU, we envision the County's likely settlement pattern for the next 30 years mirroring the last 30, a continued scattering of a few large homes on larger parcels that can secure approvals for their wells and septic systems, and possibly a few bootlegged trailers on smaller lots, in harder to reach places, where approvals are less strictly enforced.

S.O.R.E. finds many of the GPU assumptions in relation to rural east San Diego County to now be invalid and not well vetted for real economic practicality. If implemented in its current form, local jobs, community services and local businesses will continue to be lost, and the notion of local sustainability will likely be lost until a subsequent GP update. There is also no way with the new general plan densities, that these rural county planning areas can achieve their needed new housing stock to meet the projected 20+ year population estimates. The County DPLU staff has publicly stated that planned new densities have been modeled and have validated that future population growth can be affectively accommodated. S.O.R.E. disagrees. We have not studied all of the sub-regional planning areas but, in looking at the Campo/Lake Morena planning area, we have determined that there will be a need for about 840 new homes over the life of the new GP to meet the target population growth of 2,302 new residents. We have also determined that there are less than 400 existing or possible new parcels that can actually be brought to meet all county code requirements (including groundwater and public health) before the community is "built-out" under the new rural density proposal. If this same analysis holds true for the other communities in Mountain Empire and the other rural sub-regions, this shortage of housing will clearly destroy these small local economies, and put more financial burden on the County to solve this problem. S.O.R.E. requests that DPLU provide a more definitive analysis that now looks at the rural groundwater and septic constraints including minimum lot/parcel sizes as well as all other environmental, economic, and development constraints that a rural builder would need to overcome, to bring those theoretical new homes a certificate of occupancy, as part of the supporting documentation for justifying their density shift from rural to coastal property.

As stated previously, staff is not opposed to establishing Special Study Areas as a tool in the future for additional amendments following the adoption of the General Plan Update to allow for appropriate and measured growth, along with the infrastructure and services needed to support it. Staff anticipates it can more clearly outline what types of studies, timing and funding future special study areas would entail and the process they could go through to be developed.

See previous responses.

S.O.R.E. believes there are significant legal and financial impacts of plan as proposed. S.O.R.E. also believes that if the County does not recognize the unfair hardship they are imposing on the backcountry citizens, as they follow through with in their present plan to shift density (and economic value) from the mountains to the coast. S.O.R.E. strongly believes that this will be making a terrible and unnecessary mistake, based largely on faulty assumptions and bad science. More importantly, S.O.R.E. believes these actions could likely destabilize our entire region's economic fortunes for years to come by exposing the GPU and all involved to such massive law suits for "wrongful taking" and that any ability to process "discretionary land use application" through the County, in a timely manner, will be badly compromised. This means new employers and jobs will go elsewhere to grow their businesses. Examples of this kind of shift in communities' economic fortunes are evident throughout our country and it certainly can happen here in San Diego. On top of the legal morass is the specter of seeing most of east San Diego County property owners filing for major property tax relief, at a time when the County has no money to pay for rural fire protection, and is facing historic budget deficits--all for no apparent reason. It's not as if any of the five east County sub-regional planning areas have even come close to achieving their projected 1979-2009 housing targets from the old 1979 General Plan. They haven't. And this was with the Multiple Rural Use (18) land use category applied over most of the privately owned lands. The new plan as proposed would have the general affect of decreasing the allowable density for development, across the board, by a factor of approximately 10 times. Where the old standard of density was one home per 4/8/20 acres subject to slope and groundwater variance, the proposed GPU in those areas outside the arbitrarily assigned "village" boundaries, mandates density of one per 20, 40, 80, and 160 acres; and these numbers are just the start. All other regulatory restriction must be applied to achieve the final environmentally sensitive yield. There is no incentive to undertake a development with this kind of land use policy in effect.

Throughout this letter we have been pointing out the lack of economic credibility represented in the proposed GPU. Economic activity and growth does not occur just because a plan assigns densities or makes policy statements. There still needs to be a willing population to buy, a developer with the money to finance the entire project and associated community benefits and a financial feasibility that proves that builders can sell the homes for more than they were built for. That is the economic truth. That same logic must be applied to the GPU before it goes further in the approval process. There also needs to be better understanding about the economic factors that differentiate rural areas from the more developed areas.

Staff does not agree that these statements represent the legal realities in land use planning by statute or historical case law with regard to the legality of zoning or establishment of a "regulatory takings". A regulatory takings would only be established if the County of San Diego were to deny any economically viable use to a property. There is no legal right established to retain a land use or intensity designation placed on a property indefinitely.

Refer to previous comments.

Presently, the rural areas suffer from much greater incidents of stagnant economies and declining communities than their urban counterparts. In some respects it is not much different than some of our inner cities with the exception that the majority of people do not have to look at or deal with it every day. The city of San Diego had a similar problem in the east village over a decade ago. The response was to create opportunity for economic revitalization that has been nothing short of extraordinary. A similar approach needs to be taken in many of the east County communities. They are slowly dying for lack of opportunity and many of the regulations and ordinances intended to fix problems in more developed areas of the County actually work to the detriment of economic revitalization in the east County. Admittedly, there are some who find this situation to be good because it "preserves the rural areas," but these areas are inhabited by people. In some cases fourth and fifth generations of families who have the same basic needs and expectations as urban citizens. They need some modest level of economic growth or the schools, healthcare system, community services, fire protection and public safety programs will wither and die a slow death, creating more dependency on already stretched County services. These communities need to be unleashed to be at least somewhat self-sufficient and sustainable rather than restrained by a plan that condemns them to a slow death.

Refer to previous comments concerning establishing Special Study Areas as appropriate.

Noted

S.O.R.E. believes that the proposed GPU will exacerbate and already dire socio-economic situation in the eastern areas of the County that needs to be considered in the economic justice component of environmental analysis. In terms of race and ethnicity, the rural east exhibits less diversity than San Diego County generally: 78.3% of the service area population is Caucasian; 15.2% is Latino; 1.7% is American Indian; and African Americans and Asians each represent 1.5% of the area population (whereas the County's population as a whole is 55% Caucasian, 27% Latino, 9% Asian, 5% African American, and 1% American Indian). This relative lack of diversity also is reflected in the percentage of people who speak English only. In the rural east service area, 84.7% of residents speak English only, while that figure is 67% for the County as a whole.

Noted

The area's age distribution is as follows, with general San Diego County figures provided in parentheses for comparison: Ages 0-4, 5.8% (7.1%); ages 5-14, 15.8% (14.7%); ages 15-19, 7.9% (7.1%); ages 20-34, 14.3% (24.0%); ages 35-49, 26.9% (23.0%); ages 50-64, 18.7% (13.0%); and ages 65+, 10.5% (11.1%). These figures suggest no major disparities between the rural east and the county generally, though it is notable that the proportion of young adults is relatively low, and likely speaks to the relative paucity of educational and employment opportunities in the service area. The percentage of non-senior older adults (50-64) in the rural east also is significantly higher than that in the county as a whole.

Socioeconomic indicators present a mixed, and perhaps not fully dimensional, picture. The percentage of persons ages 25+ in the service area who never received a high school diploma (14.4%) is below that of the county average (17%), while the percentage of service area residents having received at least a four-year college degree (23.0%) is well below the county average of 31%. The percentage of properties in the service area with a housing value below \$150,000 was 22% in 2000, substantially higher than the 18% found countywide. The percentage of households with income below \$10,000 in the rural east service area (7%) mirrored the countywide figure. The percent of those in this area living in poverty (12.9%) mirrors the countywide rate, while the percentage of those below 200% of the poverty level (34.7%) is 12% above the countywide rate.

Noted

What is the nature of this area beyond facts and figures? Many residents make do with meager incomes in the context of isolated lives far removed from many basic services. Some families live miles down dirt roads, with multiple generations under a roof that has served as the family home for many, many years. Many families may own acres of land – an unimaginable luxury 50 miles to the west – but may not own a serviceable car, or may be able to afford trips in the car to a supermarket or large discount store only once a month.

Noted

Children may be 15 miles from their elementary school, and 30 miles from the high school. The nearest health care provider may be over 30 miles distant. While distinct data that address domestic violence, alcohol and other drug use, and behavioral health issues may not be readily available, the rural healthcare and community services provider attests to the reality that drug use (and production), family violence, and behavioral health problems are widespread, related both to those factors that lead people initially to isolate themselves, and perhaps ultimately to the isolation itself.

Noted

The County of San Diego defines six sub-regional areas within the county, including the East sub-regional area. In 2005, 12% of the general East sub-region population was uninsured, and 15.1% of the population living at or below 200% of the Federal Poverty. The eastern areas of San Diego County exhibit the highest number of persons surveyed experiencing likely psychological distress and the highest number of families surveyed noting a child limited by a behavioral health condition. More East county low-income respondents note having received Emergency Room (ER) care for a behavioral health issue in the past year than those in any other region, the highest quotient across the county; yet the East ranked 2nd in the number of low-income residents (24.9%) with behavioral health treatment. Nearly 21% of the teens surveyed countywide who had received BH counseling in the past year lived in the eastern areas of the County and the eastern region also ranked 2nd in the number of adults who experienced a period of one year-plus of unemployment related to physical or mental impairment. East region rates both of teen and older-adult (55+) suicide exceeded those of all other regions (Co. of SD, 2004 Core Indicators rept.).

Noted

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Residents surveyed in the eastern areas of the County exhibited the highest numbers of diabetes diagnoses, and the 2nd-highest rates of heart disease, high blood pressure, cardiovascular deaths, and child asthma hospitalizations. Larger numbers of east County adults surveyed noted absolute physical non-activity than in any of the other six regions (25.8% of all adults, 32.9% for low-income adults so responding), and the 2nd-highest number of obese adults (20.7% of all low-income adults noting obesity were in East).

Noted

The eastern areas of the County is home to the greatest number of families noting a child with an ADD/ADHD diagnosis. While the interaction of alcohol and other drug use with these other factors is complex, it is significant that substance use in the East is pronounced. The East region had the largest number of teens noting alcohol use (27.5% of all teen respondents countywide; 30.7% of low-income teens), and the highest number of teens who noted having tried marijuana, cocaine, glue, or other drugs (32.8% of all teens). They also were first in the number of teens noting marijuana use in the past year combined with use in the month before the survey (35.8% of all teens responding countywide; 53.0% of all low-income teens surveyed). It may also be notable that the East sub-region ranked first in fetal mortality (5.7/1,000 live births), first in infant mortality rate (7.3 per 1,000 live births), and first in the percent of pre-term births (6.7/1,000 live births – these figs. Co. of SD 2004 rept.).

Noted

In Calendar Year 2007, the percentage of patients seen by healthcare providers in the eastern areas who were at or below 200% of federal poverty level was 94%, up each of the past three years. This measure (200% of poverty level) is the federally observed rate at which a person is considered to be “medically underserved”, and includes those people often referred to as “the working poor”. The percentage of the over 7,000 individuals seen who were on Medi-Cal was 36%, and the percentage of uninsured patients was 16%. The three diagnoses with the highest rates seen among the individuals served were Diabetes and related conditions, hypertension, and cardiovascular disease on the adult side, and asthma on the pediatric side, followed by an increasing rate of Diabetes among children. These statistics are only a snapshot of the socio-economic issues that plague the eastern areas of San Diego County today. S.O.R.E. believes that the General Plan Amendment will only serve to worsen these conditions by taking the economic means from these small rural communities to work toward sustainable, self-sufficiency. The economic injustice of indiscriminate downzoning of the eastern areas of the County are uncalled for, especially under the present world-wide economic conditions.

Noted

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S.O.R.E. has unequivocally determined that the vast majority of voters/residents/property owners in east San Diego County rural communities are, and have been since the GPU 's introduction approximately 10 years ago, largely unaware of the GPU and its dramatic down-zoning provisions; or they otherwise have the belief that the 20, 40, 80 or 160 acre down-zoning provisions of the proposed GPU were soundly defeated in the 2004 Countywide vote on the Rural Lands Initiative. S.O.R.E. believes that absentee property owners in East San Diego County (which make up a large percentage of the number of property owners east of the County Water Authority Line and own a substantial amount of the privately owned property in those rural community areas), have no representation on their respective planning group as they are not entitled to vote for those positions. S.O.R.E. has also unequivocally determined that due largely to lack of awareness, the vast majority of voters/residents/property owners in East San Diego County rural communities are detached from their local community planning groups and are unaware of the function/purpose of the planning groups in making critical decisions, albeit in an advisory capacity to the County, concerning important and essential land use issues.

S.O.R.E.'s determinations as described above have been recently evidenced by the recent election in the Campo/Lake Morena community. The Campo/Lake Morena Planning Group (CLMPG) dramatically changed with the recent election in November 2008. Several long serving incumbents, who had consistently maintained slow/highly restricted growth positions on land use matters, were defeated because of the positions they consistently advocated on land use issues. Largely due to an approximate two year concentrated effort of a local organization in the Campo/Lake Morena community, that community has experienced a significant increase in awareness about the CLMPG, its function and its importance to the community. This increased awareness resulted in the changed makeup of the CLMPG. The newly elected CLMPG now comprises a more accurate and complete representation of the members of that community. S.O.R.E. is convinced that if the citizens of other rural communities in east San Diego County were similarly made aware of the role of the respective planning groups as the conduit to the County on land use issues, those communities would see similar changes in the makeup and growth philosophies of those planning groups.

S.O.R.E. believes that the General Plan is in need of updating and that it could actually be a vehicle that ensures adequate, affordable shelter, reasonable access to basic health and community services and the basic necessities of life like food, fuel, etc., and the essential ability to make a reasonable living for the current and future citizens of the County. These topics should be the principal focus of any plan for the future of San Diego County. S.O.R.E. simply asks that the County take a fresh approach with respect to the eastern areas of San Diego County and apply all the "smart growth" concepts in appropriate scale to the rural eastern communities. The proposed GPU already has many very good provisions for providing

Staff appreciates the comments, but does not agree that most absentee property owners are unaware of the GP Update, which, over its nearly 11 year planning process, has conducted substantial outreach efforts, which are continually refined and improved.

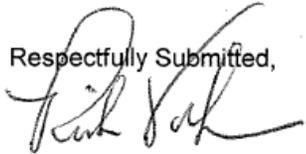
Staff is aware of the changes in the CLMPG and is currently working with the group to establish a Special Study Area to reevaluate the Rural Village area of the Land Use Map.

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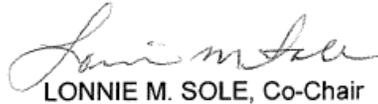
See previous responses.

walkable, sustainable, built communities. The problem is that these good intentions did not translate to the rural eastern communities. S.O.R.E. asks that the County planners sit down and redraw the maps to allow for "main streets" and realistic village boundaries in these rural communities where the people can congregate, receive services and prosper. The essence of small town America has always been and remains the concept of a compact "main street" where the fire department, sheriff, library, medical facility and commercial enterprise are located. It is place where "community" is created and this is so desperately needed in these small rural communities of east San Diego County where isolation prevails. S.O.R.E. envisions extending from these modest walkable village centers an appropriate amount of compact housing within walking distance of "main street" and expanding density designations that reflect existing development in the area, especially along the existing transportation corridors. If these concepts are right and fair for the more densely populated areas of the County, then S.O.R.E. believes they should be equally right and fair on an appropriate scale for the eastern communities. S.O.R.E. asks that the County reconsider the present approach taken in the eastern areas to strip away the future economic vitality and sustainability of these communities through the indiscriminate density downzoning provisions of the proposed GPU.

Respectfully Submitted,



RICHARD F. VOLKER, Co-Chair



LONNIE M. SOLE, Co-Chair

cc: Dianne Jacob, Supervisor
Bill Horn, Supervisor