

BOULEVARD PLANNING GROUP
P. O. BOX 1272, BOULEVARD, CA 91905

DRAFT RESPONSES

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

January 31, 2009

**COMMENTS ON DRAFT GENERAL PLAN / SUPPORT FOR
DRAFT LAND USE MAP FOR BOULEVARD**

Dear Mr. Muto,

At our regular meeting held on January 8, 2008, the Boulevard Planning Group reviewed and discussed the Draft General Plan and voted unanimously to submit this comment letter. We are glad to see the County's stated goals to conserve natural resources and to develop lands and infrastructure in a more sustainable manner. We also appreciate the recognition of the physical constraints that inadequate groundwater and infrastructure place on increased density and development in the backcountry. Our group continues to support the low density and large lot sizes in the Draft Land Use Map for Boulevard.

We thank you, and the DPLU, for the support and continued assurance that individual Community Plans, crafted by planning group members who have been elected to represent their own communities, will have firm standing to protect the unique and varied character of each community. These individual plans are necessary and invaluable tools for the protection and defense of our communities, and valued resources, from incompatible and unsustainable development. Therefore, it is critical that the General Plan provide clarity, with specific language, ensuring that Community Plans will prevail over the General Plan. Recognizing the unique and varied aspect of individual communities, especially the rural communities that span vastly different geographic areas from the coastal plain to the desert floor, is critical to prevent the homogenization of community character.

Unlike the Interest Group, which unfortunately seems to have equal standing with our Steering Committee, planning and sponsor group members are required to file Form 700 disclosing the properties we own, our sources of income, and potential conflicts of interest. The Interest Group members should have been required to do the same to disclose their sources of income, potential conflicts of interest, and biases. Community groups play a vital and public access role in land use planning, which is one more reason why Community Plans should carry more weight in community project decisions than the one-size-fits-all General Plan.

There are concerns that *"any of the Plan's mandatory elements may be amended up to four times a year"*, which seems excessive and could lead to lack of adequate public review. It has been incredibly difficult to keep up with the barrage of paperwork coming out of DPLU on this GP Update and the related changes to elements and ordinances. And we do not want to do this again anytime soon. Here are our major concerns and comments:

These comments have been noted.

The ability to amend each of the elements up to four times per year is allowed under State law. The quoted statement is reiterating the law.

NO CONSERVATION SUBDIVISIONS:

A matter of public health and safety and community character.

Clustering destroys community character by disassociating lot size from density. Our Boulevard Planning Group and the Steering Committee as a whole have repeatedly rejected the Conservation Subdivision and the *clustering* it represents. Again, we are elected to represent and protect our communities. We cannot support urban and suburban densities in our rural communities. The carrying capacity of the land can't support them in a sustainable manner either. In our area of the backcountry, we are not only concerned with the incompatibility of clustered units with rural character, we are also concerned with placing multiple wells and septic systems in close proximity to each other, and to neighboring properties, which can and does lead to contamination of the groundwater—the only affordable source of water available east of the County Water Authority service boundary.

GROUNDWATER:

The fragile and finite lifeblood of the backcountry.

Any and all development in the backcountry relies on limited groundwater resources, and has the potential to impact surface and groundwater flow and quality. Our Vice-Chair, Chris Noland, a licensed professional geologist, provided these concerns after reviewing the draft groundwater report:

It is understood that the County can only work with the limited information available. That information tends to come from small water companies, studies submitted by applicants for proposed and existing development projects (which may be selective and biased in nature), underground storage tank cases, and from drilling companies whose methods of estimating can be far from adequate. Much of the data is recent (less than 10-15 years old), with no long-term records. The draft report does not have a groundwater impact analysis or a summary of groundwater impacts and mitigation. Recommendations have not yet been published. There is no adequate cross-section of the types of aquifers that are present (sedimentary /alluvial /and fractured rock) to provide a good idea of what is actually occurring. There is a significant lack of data on fractured rock aquifers. It is difficult to secure dedicated monitoring wells in the backcountry that are not being pumped. Until these issues are included, the report will be difficult to analyze.

Dr. Victor Miguel Ponce, SDSU Professor, Department of Civil and Environmental Engineering, has worked with local property owners in the Boulevard and Campo area and developed several research studies and white papers incorporating information from Eastern San Diego County. They include *The Impact of the Proposed Campo Landfill on the Hydrology of the Tierra Del Sol Watershed, Groundwater Utilization and Sustainability, The Facts About Groundwater Sustainability, Sustainable Yield of Groundwater and Who Owns the Groundwater.*

We encourage the County to take advantage of Dr. Ponce's decades of experience, multi-discipline knowledge, and well researched work. These links will take you to some of Dr. Ponce's important work:

http://ponce.sdsu.edu/tierra_del_sol_study.html

http://ponce.sdsu.edu/groundwater_sustainable_yield.html

http://ponce.sdsu.edu/560research_accomplishments.html

DRAFT RESPONSES

DPLU appreciates the group's concern over this issue. However, staff believes that compact development can be designed in a manner that is compatible with rural or backcountry communities. The regulations of the County's Groundwater Ordinance and those that pertain to septic systems are sufficient to address concerns related to public health and safety. It should also be noted that conservation subdivisions do not increase the overall number of homes, it places them closer together. This has a negligible effect on water quality impacts to groundwater because of regulations that address septic systems and other potential pollutant sources.

These comments were on a partial draft of the County's Groundwater Study. It has since been revised and expanded upon. The complete version will be available for review and comment as part of the GP Update EIR.

DPLU appreciates this information and the group's concern for this issue. Groundwater is recognized as a significant and limited resource that requires protection. The goals and policies of the draft General Plan reflect this.

INTRODUCTION OF INDUSTRIAL WIND TURBINES TO PRIVATE PROPERTY:

Impacts of 400-600 foot tall turbines need to be addressed in the General Plan

Some of the biggest threats to community character and public safety facing our area of East County are multiple high-power transmission lines, industrial scale renewable energy projects, and related infrastructure expansion projects. In past several years there have been aggressive lobbying efforts by special interest parties related to industrial wind energy development, including Iberdrola Renewables, Invenergy Wind, Debenham Energy, SDG&E, Sempra, Hamann Companies, Lansing Companies, and more. These behind-closed-doors lobbying efforts appear on the verge of resulting in amendments related to zoning ordinances, removing the Major Use Permit requirement for Meteorological Testing Facilities, and major changes to the Wind Turbine Zoning Ordinance—both of which are scheduled to be heard at the February 25th Board of Supervisors meeting. These changes are expected to result in the proliferation of MET towers installed on private properties, for the purpose of collecting proprietary wind measurement information, and the removal of the current 80 foot height restriction on wind turbines to accommodate newer turbines, which now stand between 400 and 600 feet tall. These changes represent major impacts to private property, public health and safety, and visual and other resources, throughout the backcountry. The potential cumulative impacts will turn the backcountry into an industrial rural sacrifice zone for the benefit of distant urban areas and corporate interests—some of which are foreign owned.

Boulevard has already experienced problems with industrial turbines in the 80's with Buckeye Wind Farm on Tierra Del Sol Road where the brakes failed, resulting in one death, and blades were thrown into the road and reportedly over a mile away. Those turbines were much smaller. The Kumeyaay Wind facility, located on tribal land, went into operation in 2005 with 25 turbines that stand 324 feet tall. One massive blade shatter has already shattered. Requests for information on the size of the debris field from the shattered blade went unanswered. Non-tribal neighbors already complain of irritating groaning and vibrations from the Kumeyaay turbines, ringing in the ears and unexplained pressure in the head. These symptoms sound like those in what is now being called Wind Turbine Syndrome. Boulevard's undesirable experiences are not isolated.

Emerging evidence and commentary from communities and individual property owners impacted by industrial wind energy projects, around the nation and the world, confirm that real problems are generated along with the limited unreliable and intermittent renewable energy produced by these behemoths. Industrial wind turbines can and do shed blades, generate debilitating noise and vibrations which can result in health problems, create shadow flicker effects, suffer tower collapse, and burst into flame throwing burning oil and debris onto the surrounding area. These numerous significant hazards and impacts need to be clearly addressed in the General Plan. It is also important to note that turbines need an average back up generation source of 30-90% of installed capacity which is generally natural gas generation. The following elements, and appropriate ordinances, will need to be amended to address the very real and invasive impacts and hazards associated with industrial scale wind energy projects in our County:

- Land Use (rural lands, industrial, infrastructure)
- Conservation and Open Space (biological, water, visual, cultural, open space)

DRAFT RESPONSES

DPLU appreciates the groups concerns with wind energy. However, it disagrees of the need to address wind energy in greater detail within the General Plan. As currently written, the draft General Plan is supportive of renewable energy technologies but recognizes that potential adverse impacts from projects must be addressed.

DRAFT RESPONSES

- Noise (including ultra auditory /vibrations / health impacts)
- Safety (fire ignition source, blade shedding, tower collapse, multi-story fire fighting & aviation and radio communication issues)

Articles, photos, videos, documents, reports, legal filings, and fact sheets are available at www.windaction.org and www.windwatch.org. A moratorium on industrial wind projects is currently being pursued in the European Union due to the public backlash.

Specific comments:

Page 2-5: How We Sustain Our Community: First page, last sentence: Please add the term “low-impact” so it reads “use *low-impact* alternative energy resources”.

Revision made as suggested.

Page 2-8: Guiding Principle 2: There is that nasty “clustering” word again. See comments above.

See response above.

Page 2-13: Guiding Principle 8: We support agriculture and a program for the purchase of development rights, however, in groundwater dependent areas, we oppose any incentives to “enable farmers to create small lot subdivisions while retaining the bulk of their land for agricultural operation”—clustering.

The groups position is noted. Numerous stakeholders including the Farm Bureau have advocated for this concept as a method of retaining agricultural lands in San Diego.

Page 3-23: LU-4.6: Planning for Adequate Energy Facilities: This section needs to address the potential “*non-utility*” developers of large-scale energy projects like industrial scale wind energy and large solar installations.

The requested revision has been made to Policy COS 18.1. Policy LU-4.6 is under the goal on Inter-jurisdictional Coordination and is not the appropriate location for this.

Page 3-26: Parcel Size Reduction as Incentive for Agriculture: See comment above for Guiding Principal 8.

Noted. See response above.

Page 3-31: Goal LU-10 Function of Semi-Rural and Rural Lands & LU 10.1-10.4: These goals and policies are commendable and very much appreciated.

Noted.

Page3-38: LU-12.1: Concurrency of infrastructure and Services with Development: It is our opinion that infrastructure for new development should be in place “prior to” development rather than simply concurrent.

Revision made as suggested.

Page 3-39: LU-13.2: Commitment of Water Supply: The word “adequate” should be replaced with the “*sustainable*” for the identification of water resources to support development prior to approval.

While a sustainable water supply is an objective for the County, when a water district is present, it typically shoulders this responsibility. Therefore, the suggested revision is not considered appropriate. However, groundwater is more specifically addressed with Policies LU-8.1 and 8.2.

Page 4-21: M.8.6: Park and Ride Facilities: Our group has suggested the potential coordination with tribal agencies to consider using casino shuttle buses as a potential rural bus alternative. This could provide park and ride services, transportation to those who need it, while providing extra income to support the tribal shuttle bus services.

Noted.

Page 5-2: Visual Resources: “Geographically extensive scenic viewsheds” should be added to the list of resources to protect.

Revision made as suggested.

Page 5-4: Biological Resources: We commend the County for their goals to identify and protect the County’s unique and at-risk habitat in one of the most biologically diverse areas in the world.

Noted.

DRAFT RESPONSES

Page 5-10: Groundwater Contamination: The County should consider requiring new development, with a high potential to contaminate groundwater, to identify an alternate source of water to truck in to replace the contaminated source, and/or to cease and desist operations.

Page 5-12: COS-5.5: Impacts of Development: Don't limit impacts to be avoided to the "water quality in local reservoirs". Add well heads, well fields, groundwater resources, and recharge areas to the list of impacts to be avoided.

Page 5-15-17: COS 7 & 8: We support and appreciate the County's goals and policies to protect our cultural and historical resources.

Page 5-25: Table COS-1: County Scenic Highway System: If Historic Route 80's segment from I-8 at Japatul Road to I-8 at In-Ko-Pah is not already listed as a scenic roadway it should be. Please do so. We request that Tierra Del Sol Road which runs along the top of the Tecate Divide in Boulevard be added to the list as well. There are 360 degree views from Tierra Del Sol Road towards the Lagunas to the north, the In-Ko-Pah Mountains to the east, the Sierra Juarez Mountains to the south and east and to Campo Valley, Hauser Canyon, Tecate Peak and beyond to the west. Jewel Valley Road, Ribbonwood Road, and McCain Valley Road are also highly scenic and deserve recognition.

Page 5-27-28 : COS 11: Preservation of Scenic Resources, Preservation of Ridgelines and Hillside, Development Location on Hillside, Dark Skies: We support and appreciate the County's goals and policies to protect the Scenic Resources, uncluttered ridgelines, and our glorious dark skies.

Page 5-28: COS: 12.2: Palomar and Mount Laguna: We would like to add the San Diego Astronomy Association's Tierra Del Sol Observatory to the list of dark sky areas to be protected. It, too, attracts scientists and astronomers from around the world, and has NASA research equipment on site.

Page 5-31: Energy and Sustainable Development: Due to the significant and cumulative impacts of industrial wind turbines, as noted above in our previous comments, there are many less invasive and destructive ways to generate renewable energy at or close to the point of use. The third paragraph of this section needs to be changed to "roof-top solar photovoltaic arrays on residential *and commercial* buildings, combined heat and power, landfill gas to energy, wave power, residential scale wind turbines, and other renewable sources. The County should take this opportunity to toot their own horn on their plans to finance the installation of PV allowing property owners to repay the loans through their annual property tax bill. This breakthrough will no doubt spur the growth of PV generated power. The introduction of Feed In Tariffs will also allow small generators to feed extra energy generated onto the grid and generate income at the same time.

The weatherization of existing buildings, replacing old energy hog appliances with Energy Star appliances, installing dual pane windows, and constructing new buildings to LEED standards are also good ways to conserve energy and reduce consumption and should be included. Many new buildings can and should be built to be supply virtually all of their energy needs—net zero.

Page 5-32 COS 14.9: Alternative Energy Sources for Development Projects: We request that the County rephrase the "wind energy" to "residential scale wind energy".

The County appreciates the suggestion and will consider these measures for implementation of Policy COS-4.4.

Groundwater resources and recharge areas have been added to the policy. Well heads and fields are subsets of these.

Noted.

Old Highway 80 has been added to the list. Tierra Del Sol Road, Jewel Valley Road, Ribbonwood Road, and McCain Valley Road are not part of the General Plan Mobility Element Road network and therefore are not listed. It is suggested that the Subregional Plan include these road as scenic resources.

Noted.

While the Astronomy Association's viewing site (APN 658-090-26) carries importance to the region, DPLU does not agree that this private use should be treated the same as the Palomar and Laguna Observatories.

Revisions have been made to this section similar to those suggested.

Some of these techniques are already mentioned.

Staff does not agree that the County should limit its ability to consider non-residential wind energy projects. The request is appreciated but no change was made.

We prefer the previous Goal LU6.F language shown as a ~~strikeout~~ on page 14 of the Revisions to the April 25, 2008 Version of the Draft Land Use Elements : “A sustainable regional energy strategy with facilities and infrastructure that minimize impacts to the rural and natural resources”

Page 5-33: Incentives for Sustainable and Low GHG Development: Due to requirements in SB375 and other existing laws requiring low GHG and sustainable development and building standards, *the County should not be providing incentives, expediting, or fast-tracking projects that simply comply with existing law.*

Page 5-33: Green Building Program: We support and appreciate the County’s goals to require new County facilities and the renovation and expansion of existing buildings to meet “green building” standards. We also suggest that the County incorporate PV and other on-site and /or nearby renewable energy options which generally pay for themselves in several years through reduced energy costs.

Page 5-35: COS 18.1: Alternate Energy Systems: We appreciate the language used here “to maintain the character of their setting”, but there are many companies, other than SDG&E, that can help design and install low impact alternate energy projects in the urban use basin.

Page 7-2- 9: Safety Element: As stated previously, there are multiple areas here that need to be revised to address industrial wind turbines, including but not limited to: public safety, emergency response, fire hazards, multi-story turbine fires at an average of 400 feet in height, service availability, secondary access, water supply for turbine and wildland fire sparked by turbines, and more.

Page 8-2-15: Noise Evaluation and Measurement: See previous comments on industrial wind energy projects above. This element needs to be rewritten to incorporate all of the noise, vibration, and ultra auditory impacts from industrial wind energy turbine projects, including the need for significant setbacks. Noise carries much further in our higher elevation area with thinner air and fewer sound blocking structures.

Page 7-16: Figure 5-5 Flood Plains: This map does not show the flood plains in McCain Valley, Jacumba Valley, or Campo Valley, all of which overflowed during the El Nino cycles and during Hurricane Kathleen.

Conclusion

This General Plan Update has been an extended marathon effort that we will all be glad to see come to an end. We appreciate the hands-on opportunity to help guide the future development of our own community and the County as a whole. Thank you for listening and incorporating many of our comments and concerns. Staff’s patience, support, and willingness to come out to meet with our community members and clarify the issues is also appreciated.

Sincerely,

Donna Tisdale, Chair
619-766-4170
donnatisdale@hughes.net

DRAFT RESPONSES

Goal COS-18 has been revised to incorporate some of the concepts from the referenced goal.

This policy has been revised to clarify that incentives are for those that exceed standards.

This suggestion is appreciated and the County is committed to investigating these options as part of implementing Policy COS-15.2 and its Climate Protection Action Plan.

This policy has been revised to have broader applicability as suggested.

As previously stated, staff does not agree that policies specific to wind turbines are necessary. The issues raised are covered by other policies. Also, to single out a specific use such as wind turbines would not be consistent with the general approach to preparing the General Plan.

See response to the previous comment.

Figure S-5 shows only FEMA and County mapped floodplains. The floodplains identified by the comment have not been officially mapped. A note has been added to the figure to clarify this.

Staff appreciates the group’s participation and comments.

Review Details			
Requestor	Comments Due Date	Product Nomenclature	Date of Document
DPLU	30 January 2009	San Diego County draft General Plan	November 2008

Reviewer	Contact Data	Representing
Jack Vandover	javplanning@cox.net	Crest, Dehesa, Granite Hills, Harbison Canyon Planning Group

Item No. *	Initial - #	Location (Page/Para #)	Defect Description And Recommended Change
1	JAV-1	P2-8/3 rd Para 3	Disassociating parcel size and density is a bad idea, as has been argued many times at the Steering committee meetings
2	JAV-2	P3-34/ last paragraph	Delete. Alternately rewrite to emphasize the dependence of ground water on the local rainfall.
3	JAV-3	P4-24/M-10.3	We should be minimizing on street parking, not maximizing it. On-site parking should always be provided.
4	JAV-4	P4-24/M-10.4	Remove. We should be discouraging the use of on-street parking and pushing all development to provide off street parking
5	JAV-5	P5-15/COS-6.2	2 nd and 3 rd bullets: change "encourage" to "Require". New development should be required to make itself compatible with existing agriculture.
6	JAV-6	P3-38/LUI12.1	Remove "either directly or thru fees". Too many times we've seen fees paid and the infrastructure not provided. It needs to be provided, period.
7	JAV-7	P3-39/LU-13.1	Change "high quality water supply" to "high quality sustainable water supply"
	JAV-8	P3-39/LU-13.2	Change "adequate water" to adequate sustainable water"
	JAV-9	P3-27/last Para	Change "beneficial to a community's identify," to "beneficial to a community's identity."
	JAV-10	P3-39/Goal LU-14	This sentence does not make sense. Should it be "Provide communities with adequate water...?"
	JAV-11	Goals	Most goals are sentence fragments that may or may not make sense. Rewrite them as complete sentences so that they will make sense. As an example see JAV-9 and : LU-16 "Insure waste management facilities . . ."
	JAV-12	P4-14/M-4.4	Add "while" between "vehicles" and "accommodating"
	JAV-13	P5-14/COS-6.3	"When mutually beneficial and conflicts with non-agricultural uses are minimized..." does not make sense.

JAV-1 Noted. This concept has already been endorsed by the Board of Supervisors`.

JAV-2 Staff does not agree with this recommendation. The County Water Authority has little to no dependence on local groundwater.

JAV-3 This policy has been modified to clarify that it is intended for town centers with commercial areas where street parking improves walkability, viability, and character.

JAV-4 See above. Once modified, these policies will have negligible applicability to the group's planning area.

JAV-5 The suggested revision to the 2nd bullet would place requirements on agriculture which may be difficult and onerous to implement. Therefore, staff has not made that revision. The 3rd bullet has been modified to clarify its intent.

JAV-6 In many cases (such as parks, schools, and cumulative traffic improvements) it is not feasible for a single development to provide the infrastructure. Fees are the only feasible mechanism to fund and provide the infrastructure.

JAV-7 Revision made as suggested.

JAV-8 While staff agrees with this concept, it does not agree that this revision is appropriate because adequacy is not necessarily limited to sustainability.

JAV-9 Revision made as suggested.

JAV-10 A typo in this goal has been corrected.

JAV-11 Goals are statements of an ideal future condition. They are consistently written in this fashion.

JAV-12 Revision made as suggested.

JAV-13 This policy has been rewritten.

DRAFT RESPONSES

Item No. *	Initial - #	Location (Page/Para #)	Defect Description And Recommended Change
	JAV-14	P5-35/COS-17.2	Remove "where appropriate". Recycling and reuse should be required.
8	PMU-1	P3-36Par3	Co. should support "virtual" opportunity for every student to have every class available in the Co.
9	PMU-2	P3-40/LU-17	Add: SDCo should encourage school districts to provide each student a "virtual" opportunity to take any class offered in the Co.
10	PMU-3	COS-1	County Scenic Highway System: add, La Cresta Rd, Mountain View Rd & Francis Dr between Greenfield Dr & Harbison Canyon Rd
11	PMU-4	COS-1	County Scenic Highway System: add, Harbison Canyon Rd between Arnold Way and Dehesa Rd.
12	PMU-5	COS-1	County Scenic Highway System: add, Dehesa Rd between Tavern Rd & Washington Ave. (City of El Cajon)
13	PMU-6	COS-1	County Scenic Highway System: add, Willow Glen Rd between Dehesa Rd & Jamacha Rd.
14	PMU-7	P6-7, bullet 4	Village Issues: re unincorporated areas resisting higher density unless it includes parks, etc: conflicts with P5 Par 1 Parks & Rec Facilities "enhance the quality of life. . .with approximately 10acres of local parks" Parks are a necessity.
15	MLGM-1	2-8	Dup JAV-1
16	MLGM-2	2-12	Last Par. New development
17	MLGM-3	3-31/LU-10.1	Who designates village lines
18	MLGM-4	10-25	Open space remove natural
19	MLGM-5	3-39LU-14.4	Do village lines get moved if need to increase sewer area
20	MLGM-6	4-11/3 rd	County may, change to shall
21	MLGM-7	4-12/M13	Narrow right of ways/
22	MLGM-8	4-22TDM	County offer incentives? County giving money to developers-conflict of interest?
23	MLGM-9	4-24/m-10.3	Same as JAV-3
24	MLGM-10	4-24/M-10.5	Remove-limits future use of structures
25	MLGM-11	4-29/M-12.3	Who appropriate jurisdiction
26	MLGM-12	2-8	Same as JAV-1
27	MLGM-13	4-29/M12-8	Add with private property input
28	MLGM-14	5-2 bul 1	Remove natural
29	MLGM-15	5-3	Guiding principle are historic resources the same as cultural?
30	MLGM-16	5-10/COS-4.2	New construction
31	MLGM-18	5-14 /COS-6.2	Bul. 3 No we want to encourage ag and res mix by right
32	MLGM-19	5-16/COS-7.5	gray-remove including Ancestral Native American, not necessary covered by humans
33	MLGM-20	5-27-11.4	remove designated
34	MLGM-21	5-33/COS-14.13	same as MLGM-8
35	MLGM-22	6-10	mobile homes/tailors-do we want our back country covered in trailers?

JAV-14 Revision made as suggested.

PMU-1 The suggested policy does not relate to the County's physical development. Therefore, the General Plan is not an appropriate location for it.

PMU-2 See above.

PMU-3 Added as suggested.

PMU-4 Added as suggested.

PMU-5 Added as suggested.

PMU-6 Added as suggested.

PMU-7 The text was referring to usable open space within the development. The text has been revised to clarify this.

MLGM-1 See response to JAV-1.

MLGM-2 It is unclear what this comment is suggesting.

MLGM-3 As described on page 3-3, village lines are established in the community plans.

MLGM-4 This definition has been deleted.

MLGM-5 Village lines may be modified through an amendment to the community plan but must be consistent with other General Plan policies such as LU-1.6.

MLGM-6 No change. Full width is not typically required if alignment does not fall entirely on project site.

MLGM-7 No change, correct pluralization is "rights-of-way."

MLGM-8 Incentives (which are not necessarily monetary) are a commonly used technique and there is no inherent conflict.

MLGM-9 See response to JAV-3.

MLGM-10 Staff does not agree with this statement, there is limited connection in this policy between use and parking reductions.

MLGM-11 This policy has been revised to clarify.

MLGM-12 See Response to JAV-1

MLGM-13 No change, reference to "willing property owners" is sufficient.

MLGM-14 Added cultural instead in response to comment.

MLGM-15 Cultural is typically inclusive of historic. Text revised to correct.

MLGM-16 This policy shouldn't necessarily be limited to new construction.

MLGM-18 This bullet has been modified.

MLGM-19 No change, text in response to specific concerns by Native American community.

MLGM-20 Revision made as suggested.

MLGM-21 See response to MLGM-8.

MLGM-22 The text simply recognizes that mobile homes have provided affordable housing.

DRAFT RESPONSES

Item No. *	Initial - #	Location (Page/Para #)	Defect Description And Recommended Change
36	MLGM-23	6-11	concerned by flexible building standards
37	MLGM-24	7-9/-8.1	Important to require Water District to update mains and fire hydrates in new construction areas HC has few fire hydrates and spaghetti lines ½ mile to homes on west side of Canyon. New St George, Ridge Trail, Normandy Way and Kelly

Noted. Per policies, flexibility requires conformance with community plan.

The County does not have authority to require this of Water Districts; however, the County will work closely with water and fire districts to condition new development on required infrastructure improvements.

To: Department of Planning and Land Use
From: Descanso Planning Group
Date: January 26, 2009
Re: Comments on the Draft General Plan

DRAFT RESPONSES

The Descanso Planning Group (DPG) reviewed the Draft General Plan at the regular January 15, 2009 meeting and approved a motion to offer the following comments:

1. The DPG supports the definitive policy statements included in the Draft General Plan.
2. The DPG supports the use of individual Community Plans to apply these policies to define the unique community character.
3. The DPG supports GOAL LU-8 Aquifers and Groundwater Conservation and Policies LU-8.1 Density Relationship to Groundwater Sustainability and LU-8.2 Groundwater Resources and GOAL LU-13 Adequate Water Quality and Supply and Policy LU-13.2 Commitment to Water Supply but we are concerned with general statements “require development to identify adequate groundwater resources.” As a groundwater dependant community largely supplied by individual wells, we do not believe there are reliable studies that measure or explain long-term factors affecting the aquifers feeding our wells. Until such studies are available, we would recommend adding a more definitive policy that limits new groundwater based development to housing at general plan zoned density or very low water use commercial.
4. The DPG is concerned that the majority of the Descanso Land Use Map Figure LU-A-4.2 is now designated Forest Conservation Initiative (FCI). The FCI designation overlaid density determinations (1:40) that placed most of existing Descanso properties at “non conforming use” density. Since final General Plan land use designation is not included on the map at this time, we recommend that the EIR also analyzes these properties at pre-FCI density/land use designations (assumes pre-FCI density/land use designation would be a maximum future designation).
5. The FCI designation compounds the problem that faulty historical surveys exist in parts of Descanso. Including pre-FCI density/land use designation in the EIR can help mitigate the requirements on property owners needing property line adjustments to accommodate existing septic systems, structures, and wells. The DPG also supports the Prazma comment to the Draft General Plan (copy attached) that a policy be included specifying practical methods to resolve boundary line issues resulting from erroneous historic county survey records.

Michael A. Sterns
Chair
Descanso Planning Group

1, 2 – The group’s support is noted and appreciated.

3 – DPLU appreciates the group’s concern over the groundwater issue. Overall, the General Plan Update proposes decreased densities in the Descanso area when compared to the existing General Plan. A Groundwater Study is being conducted as part of the General Plan Update Environmental Impact Report that will explore the long-term viability of the aquifers throughout the groundwater dependent areas of the County. Additionally, any increases in general plan zoned density would require a subsequent General Plan Amendment and a similar analysis of the groundwater resources.

4 – As stated in the draft General Plan Update, once the FCI sunsets, a General Plan Amendment (GPA) will be required to bring those properties affected by the FCI into conformance with the new designations. As part of this GPA, DPLU plans to rectify the “non-conforming uses” that the group references. Because these uses are existing, they are already included within the “baseline conditions” of the environmental analysis. Additionally, within the cumulative analysis for the EIR, an FCI redesignation scenario will be considered.

5 – The group’s support of the Prazma comments is noted. Consistent with the comments, DPLU plans to address this issue as part of the FCI GPA.



2008 Board Members:

Melanie Fallon, Chair
Jacqueline Arsivaud-Benjamin, Vice-Chair
May Meintjes, Treasurer
Mid Hoppenrath, Secretary
Eric Anderson
Christopher Dye
Karen Gardner
Dr. Manutche Sohaey
Bill Telesco

DRAFT RESPONSES

20223 Elfin Forest Rd., Elfin Forest, CA 92029

Friday, January 16, 2009

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

Dear Devon Muto,

The Elfin Forest Harmony Grove Town Council (EFHGTC) appreciates the opportunity to comment on the Draft General Plan documents.

Land Use Maps Appendix

In the Land Use Maps Appendix, the EFHGTC strongly opposes the San Dieguito Land Use Map, Figure LU-A-20 (*page 36*). In Harmony Grove it allows unacceptably high densities in the semi-rural and rural areas surrounding the Specific Plan Area known as Harmony Grove (SD1, SD7 and SD8.) These densities do not meet the plan as envisioned by the community after years of planning with the DPLU staff and New Urban West. This is not the map that is shown in the Harmony Grove Community Map, which was submitted to the County in October, 2008, and has been approved by the Elfin Forest Harmony Grove Town Council and the San Dieguito Planning Group.

In the Elfin Forest community the San Dieguito Land Use Map also depicts higher densities in areas that are in conflict with the draft Elfin Forest Community Plan and the Draft Land Use Map. (SD 2, SD4, SD-6 and SD8.) In addition, these densities are in direct conflict with the County goals LU 2-1, LU 5-3, LU 6-8, and LU 7-1.

As we stated in both the Elfin Forest Community Plan and the Harmony Grove Community Plan, the Elfin Forest/Harmony Grove Town Council supports the Draft Land Use Map instead of the Proposed Project Referral Map. The Draft Land Use Map accurately depicts the future development potential of our communities as defined in the County's Draft General Plan and the Draft Elfin Forest Community Plan and Draft Harmony Grove Community Plan.

In addition, the General Plan Update land use map is lowering the densities on much of the property within both Elfin Forest and Harmony Grove (for example from SR-2 to SR-4.) While we support this change in density, many residents have expressed a concern that they may not be able to add-on or expand their existing homes that were built to the plan (for example

The EFHGTC's position will be presented to the PC and BOS when the final maps are considered for adoption. The maps provided in the appendix are the BOS endorsed Referral Maps and, as indicated on the figures, will be revised to reflect the final decision of the BOS.

The EFHGTC's position will be presented to the PC and BOS when the final maps are considered for adoption.

The EFHGTC's position will be presented to the PC and BOS when the final maps are considered for adoption.

designation of SR-2), or to rebuild after a wildfire, because the Building Department would consider their properties to be non-conforming once the new General Plan is adopted. Can you please clarify this issue so we can put the residents' fears to rest?

Land Use Section

In Section 3: Land Use Element, Purpose and Scope, Community Plans, *page 3-3*, there is no mention of the Harmony Grove Community or the Harmony Grove Community Plan, although it was originally submitted to the county in 2001, and was recently re-submitted to the county in October of 2008. Please add our community to the list.

In Section 3, on *page 3-9*, we agree with the County's assessment of the benefit of rural land, which, as noted, does all of the following:

- Preserving the County's rural atmosphere
- Protecting land with significant physical or environmental constraints or hazards
- Preserving open space, farmland, and natural resources
- Providing open space buffers and a visual separation between communities
- Preserving and providing land for agricultural opportunities
- Preventing sprawl development, which reduces vehicle miles traveled and greenhouse gas emissions

In Land Use Goals, we support Goal LU-2, Maintenance of the County's rural character, especially LU-2.1, which maintains Community Plans to guide development to reflect the character and visions for each individual unincorporated community.

In Land Use Goals, we support Goal LU-4, Inter-jurisdictional Coordination, especially LU-4.5, which opposes annexations by neighboring cities that would result in land uses incompatible with unincorporated lands.

In Land Use Goals, we support Goal LU-5.3, Rural Land Preservation, which will preserve existing undeveloped and rural areas (e.g., forested areas, agricultural lands, wildlife habitat and corridors, wetlands, watersheds, and groundwater recharge areas) that provide carbon sequestration benefits.

In Land Use Goals, we support Goal LU-6.1, Environmental Sustainability, which supports the protection of critical and sensitive natural resources and the long-term sustainability of the natural environment. We support Goal LU-6.2, Reducing Development Pressures, which assigns low-density or low-intensity land use designations to areas with sensitive natural resources. We support Goal LU-6.8, Development Conformance with Topography, which requires development to conform to the natural topography to limit grading; incorporate and not significantly alter the dominant physical characteristics of a site; and to utilize natural drainage and topography in conveying storm water to the maximum extent practicable.

DRAFT RESPONSES

This comment seems to be referring to the potential non-conformity of density and minimum lot sizes. Non-conformity is a Zoning Ordinance issue and for residential lots, is primarily based on minimum lot size. DPLU does not anticipate rezoning minimum lot sizes in a manner that will result in non-conformity.

Harmony Grove is not an official Planning or Sponsor Group and therefore is not recognized in this list.

The group's support is noted and appreciated.

DRAFT RESPONSES

In Land Use Goals, we support Goal LU-7.1, Agricultural Land Development, which protects agricultural lands with lower-density land use designations that support continued agricultural operations.

In Land Use Goals, we support Goal LU-10, Residential Connectivity with requires residential development in Semi-Rural and Rural areas to be integrated with existing neighborhoods by providing connected and continuous street, pathway/trail, and recreational open space networks. We support LU-10.2, Development–Environmental Resource Relationship, which requires development in Semi-Rural and Rural areas to conserve the unique natural features, preserve rural character, and avoid sensitive environmental resources and natural hazard areas.

Housing Element

We disagree with the proposed clustering policy for rural areas stated in the following sentences: “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. Also the permitted use of mobile/manufactured homes affords lower single-family prices in these rural areas.” (page 6-10) We believe that large lot, single family homes and small farms will best reflect the character of our rural area and allow for the continuation of the rural lifestyle, as mandated by goals LU-2, Maintenance of the County’s rural character and LU-10.2, Development–Environmental Resource Relationship, among others. Clustering is best left to urban and suburban areas. We believe this approach is more compatible with the policy stated on page 6-11: “Development should be compatible in bulk, style, and scale with the character of its surroundings while still meeting the needs of its residents.”

San Dieguito Mobility Element Network

In the Mobility Element Network—San Dieguito Community Planning Area Matrix, page 65, Number 2, according to initial traffic analyses conducted by County staff, Harmony Grove Road does not need to have a continuous turn lane from Country Club Drive to Citracado Parkway to accommodate the expected traffic resulting from adoption of the Draft Land Use Map for the area.

In Number 3, Village Road should be changed to the approved name, Lariat Drive.

Country Club Drive north of Lariat Drive is accurately shown as a local road in the mobility element map, but its downgrading from a circulation element road to a local road is not called out in the numbered changes shown in the SDPG planning area matrix.

The Elfin Forest Harmony Grove Town Council respectfully requests that you consider the following when making your recommendations concerning the General Plan Circulation Element Update for the San Dieguito and Harmony Grove areas:

- 1) Downgrading of Elfin Forest Road from a 4-lane collector to a 2-lane collector.
- 2) Downgrading of Harmony Grove Road from a 4-lane collector to a 2-lane collector.
- 3) Removal of Country Club Drive from the county’s circulation element.

The group’s support is noted and appreciated.

The group’s support is noted and appreciated.

DPLU appreciates the groups concern with this issue. DPLU believes that subdivisions with reduced lot sizes can be designed in a manner where they are compatible with the surrounding area. This can be done through innovative design, landscaping, buffers, and other techniques.

The matrix represents the BOS endorsed road network and therefore cannot be modified at this time. However, the matrix has been updated to note this information so that it can be considered for approval of the final version.

This name has been updated.

Local public roads are not considered part of the General Plan designated road network and are therefore not specifically identified (see page 4-9 of the draft General Plan). Additionally, the draft General Plan does not show changes from the previous General Plan. These changes will be detailed in the planning report provided to the PC and BOS.

See next page for response to this comment.

DRAFT RESPONSES

The group's requests are appreciated and are reflected on the draft General Plan Update road network. Note, staff will remove the line indicating Country Club Drive from Figure M-A-20 as it is unnecessary to show since it has been removed from the CE network.

- 4) Elimination of the planned extension to Del Dios Highway of Country Club Drive, commonly known as SC1375.

Thank you for the opportunity to comment on this program.

A handwritten signature in black ink that reads "Melanie Fallon". The signature is written in a cursive, flowing style.

Melanie Fallon, Chair, Elfin Forest Harmony Grove Town Council

cc: San Diego County Supervisors, San Diego County Planning Commissioners; San Dieguito Planning Group; Eric Lardy

Page 4-23

M-9.1

“Transportation Systems Management. Prior to increasing the number of road lanes, explore the provision of operational improvements that increase vehicular capacity of the public road network”. Additionally, explore improvements that would decrease or eliminate side friction such as the addition of left turn lanes and acceleration lanes as well as increasing the number of lanes just at major intersections.

Comment. We believe that we can increase the effectiveness of our roads, without adding lanes the entire length of the roadway, (and thus decreasing the rural atmosphere of our communities), if we concentrate on removing the side friction and on improving the efficiency of major intersections. This is consistent with the paragraph on Transportation System Management (TSM) located on page 4-22 when it states, “TSM strategies focus on increasing the efficiency, safety, and capacity of existing transportation systems through strategies that relieve, lessen, or control congestion with minimal roadway widening. Techniques include performance monitoring, various types of intersection modifications,”

DPLU agrees with this comment and believes that Policy M-9.1 is consistent with the comment as well. Policy M-9.1 has been revised to include reference to some examples (as suggested), as well as to start the policy with an active verb (consistent with other policies in the General Plan).

Page 5-14. COS-9.2

“Encouraging development to allow agricultural uses ~~such as orchards, gardens or pastures on appropriate lots (e.g., residential lots one acre or larger and/or located near surrounding agricultural uses.”~~

DPLU agrees with this comment. The policy has been revised as suggested and expanded upon.

Comment. We said at the beginning of this General Plan update that we believed there were no lots in San Diego County that were unacceptable for some type agriculture.

Page 5-21 GOAL COS-10

“Protection of Mineral Resources. The long-term production of minerals adequate to meet the local County demand 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.”

DPLU considered the suggested word replacement but was concerned that eliminating “adverse effects” would be a bar that could never be met due to the inherent impacts associated with mining operations. No change was made.

Comment. The word “Minimized” at the end of the sentence seems to be lacking in its effort to protect the citizens of San Diego from an extractive project. Perhaps “eliminated” would be a better choice.

Page 5-22

DRAFT RESPONSES

Add to the end of COS-10.8, “Additionally, develop specific monitoring requirements to be included in permits to protect the surrounding community from airborne particulate materials, noise and tremors caused by the mining operation.”

Comment. While it is realized that mining operations strive to use “Best Management Practices”, that is not always sufficient to protect the community from the mining operations, especially, when mistakes are made, (and who doesn’t make mistakes). By establishing a uniform monitoring policy for all new applications the county will be far better able to protect the surrounding community while making it easier for permit applications to be approved.

Page 10-6

“Agriculture – Use of land for the production of food and fiber, including the growing of crops and/or the grazing of animals ~~on natural prime or improved pastureland.~~”

Comment. We said at the beginning of this General Plan update that we believed there were no lots in San Diego County that were unacceptable for some type agriculture. To let the words “natural prime or improved pastureland” remain would at the very least require a definition of those terms.

“Agricultural/Urban Interface – The agricultural urban interface is the boundary between rural/agricultural and urban/suburban areas. Conflicts may exist between use types in rural/agricultural areas and urban/suburban areas. These include noise, light, air quality, and traffic impacts to residences from agricultural production and limitations on agricultural production due to urban/suburban residential concerns.”

Comment. If we are going to “limit ag” based on development then we need to limit development based on ag. Especially since we said at the beginning of this General Plan update that we believed there were no lots in San Diego County that were unacceptable for some type agriculture, but we did not say there were no lots in San Diego County that were unacceptable for development.

This concept has been incorporated into the policy but with slightly less detail to allow for some flexibility with implementation.

This definition has been deleted.

This definition has been deleted.

Pg. 1-2, last para.: Use of the word “constitution” is out of place/ misused.

Pg. 1-13, second to last para. last sentence: word “enviable” is not correct

Pg. 2-7, “limit line” definition to be added to Glossary

Pg. 2-8, add to end of second to last para.: In cases where conflict exist, the Community Plan and or community character shall prevail.

Pg. 2-9, Last para. first sentence; statement is inaccurate and not supported by indicated quote.

Pg. 2-11: Support “growing body of evidence” with a footnote of supporting reference.

*Pg. 2-12, second para. : replace word “culture” with “cultural activities” or other more suitable terminology.

Pg 2-12, fourth para. : Change first part of para. to read: “ Reduced consumption of energy, water, and raw materials; generation of waste; and use of toxic and hazardous substances should be considered in all aspects of development”

*Pg.3-3, The use of the term “limit line” as used on page 2-7 needs to be more clearly related to “Urban Limit Line and/or Village Boundary” as use on page 3-3.

*Pg. 3-25, Should Horse Trails be included?

*Pg. 3-26, LU 7.1 : by definition includes animal grazing.

Pg. 3-27, LU 8-2 : Does “new development” include building of SFD on existing legal parcels? Recommend that it not include existing legal parcels.

Pg. 3-39, LU 14.4, change last sentence to read: “Sewer systems and services shall not be extended beyond Village boundaries where currently allowed or exist, except when necessary to preserve established open space or serve civic facilities.”

Pg. 3-39, When the term “adequate” is used to qualify “water resources”; does it include the meaning of “sustainability”? Sustainability must be part of the definition of adequate!

Pg. 4-11, second bullet: add to second sentence: “consistent with road design speeds, sight distances, and suitable available right of way”

Pg. 4-19, M 7.1: Reference to Goal S-15, page 7-23 should be noted.

No change. General Plans are often equated to constitutions. See page 10 of the California Office of Planning and Research General Plan Guidelines.

Replaced with “undesireable.”

“Limit line” has been changed to “boundary” and a defnition has been added.

This paragraph has been revised and relocated to Guiding Principle 4. A reference to community plans has been added to this paragraph.

This statement has been modified.

DPLU disagrees that a supporting reference is needed for this statement. The California Attorney General’s website has several references. Also, refer to the recent San Diego Foundation 2050 study.

Revision made as suggested.

Revision made as suggested.

Page 2-7 has been modified to use the term boundary which is the same as what is used in this section.

Although equestrian trails are valued by the County, they are not considered a major contributor to vehicle trip reduction and therefore not mentioned here.

Agreed.

Whether or not new development would apply to SFDs on existing legal lots is determined through implementaion. In the case of this issue, this policy is not typically applied to SFDs on existing lots.

DPLU appreciates this suggestion but it is unclear what the addition of “where currently allowed or exist” is supposed to mean. Therefore this revision has not been made.

Adequate is a broader term that can be inclusive of sustainability. Adequacy is often demonstrated through approval by a water district. The water district plans for sustainability. For this reason, adequate is the term used.

DPLU appreciates the comments but does not agree that this revisions is necessary.

A reference has been added, however, page numbers will not be included until the final version.

DRAFT RESPONSES

Pg. 4-24, Goal M-10: And overall bad idea to reduce onsite parking for commercial or high density activities. In Rural Villages, on-street parking should be limited and consistent with established community character.

Pg. 5-2, add to “Biological Resources” bullet: “through quantifiable requirements that accomplish specific goals.”

Pg. 5-7, COS 1.4, change sentence to read: “Collaborate with other jurisdictions and trustee agencies to achieve well defined and quantitative common resource preservation and management goals.”

*Pg. 5-27, COS 11.3, fifth bullet, change to read: “Clustering of development so as to preserve a balance of open space vistas, natural features, and community character.”

Pg. 5-28, Goal COS-12, Policy COS 12.2. The use of the word “enhance” is out of place and should be removed.

Pg. 6-2, third para. , add to end: “Reduction in lot size shall not violate established community character.”

Pg. 6-3,: The current CWA boundary around the “Honey Springs Ranch area” has previously been recommended by the JDCPG to be removed. The CWA in such an area is “leap frog development” at its worst and in conflict with “Guiding Principle 2” page 2-7, and “Guiding Principle 4” page 2-9, as well as the area is now publicly owned.

Pg. 6-14, H 3.3: Recommend a “maximum” allowable bonus be stated here or elsewhere.

Pg. 7-8, policy S 4.1, add to end of sentence: “and need for insurability.”

Pg 8-9, Table N-1: Add note to indicate that Table N-1 is for normal daily activities of completed facilities/ structures.

Pg. 9-7, Groundwater Ordinance bullet: If the word “adequate” does not include the meaning of “sustainable” then add “sustainable”.

Policies M-10.3 and 10.6 have been revised to better reflect these and other comments.

Quantifiable requirements are not always feasible for biological resources and are not a fundamental goal of this element; therefore, this revision was not made.

Revised without “quantitative.” While desired, it is impractical that all goals would be quantitative.

Revision made as suggested.

Revision made as suggested.

Revised to mention community character.

Noted. The recommended removal requires a LAFCO action. Figure H-1 reflects existing boundaries and will be modified if changes to boundaries are made.

Maximum density bonus will be stated within the zoning ordinance.

This revision is under consideration.

Use of Table N-1 is directed through Policy N-1.1.

Although adequate includes sustainable, “sustainable” has been added.

DRAFT RESPONSES

From : Julian Community Planning Group.

The Julian Community Planning Group at its Jan. 12, 2009 meeting discussed the Nov.2008 Draft General Plan and has the following comments and suggestions.

Section 3, page 12. Floor area ratios are not appropriate for the Julian Historic District Townsite. This area needs to be excluded from FAR requirements.

Section 4 pages 8 and 9. Strongly urge narrower minimum right of way widths on roads 2.2E, 2.2F, 2.3 B and 2.3 C. (Note: the Julian Community Planning Group provided the County with detailed proposed road standards for the Julian region several years ago). If a wider easement is needed during construction a temporary construction easement can be obtained.

Section 4 page 24 M.10.4. This section is appropriate for the Julian Historic Townsite and should be retained for this area.

Section 5 page 10 COS 4.2. There needs to be some flexibility added to this section. "Required" is too rigid. It is important to save water, but also important to encourage shade trees to reduce energy needs. Many drought tolerant plants have high oil content and are quite flammable, and it is not wise to depend on a few species in case of disease or insect outbreaks such as those attacking native pines and oaks.

Section 5 page 19, paragraph 3, line 4. Probably a typo in the number of tons in estimated demand.

Section 5 page 27 COS 11.4. Line 2. Should leave the word "designated" in.

Section 6 page 10 Last paragraph, last line. JCPG agrees that it is important to keep the option to use mobile/manufactured homes available.

Section 6 page 11. Housing Affordability . Agree that encouraging farm worker housing is a small but important step in the difficult and complicated affordable housing issue.

Section 10 Glossary

Section 10 page 6 Agriculture Change definition to : Use of land for the production of food, fiber, and ornamentals and /or the grazing of animals. Reason: the present definition is not appropriate or accurate for San Diego County agriculture.

Section 10 page 12 Cropland. Change definition. (possibility 1) A land use category that includes areas used for the production of crops. There are two categories of cropland, irrigated and non-irrigated. Cropland may be cultivated regularly, occasionally or not at all. (possibility 2) Land used for the production of annual or perennial crops.

Section 10 page 16 Farmland. Change definition to: An area on which plants and/or animals are raised. ("for livelihood" has nothing to do with whether it is farmland)

Section 10 page 25 Open Space. Eliminate the word "Natural". It does not fit with the rest of the definition e.g. river levees, agricultural lands.

Section 10 page 28 Prime Farmland. Eliminate the 3rd sentence. This category relates to the land's potential, not whether it has been irrigated or used within 3 years.

Section 10, page 32 Sewer Capacity. Typo in capacity of larger line.

As noted under footnote a, FARs may be exceeded in areas specified by a community plan. This should be the approach for the Julian townsite.

The provided widths are typical. Narrower widths are allowed.

Noted.

Agreed. Policy has been modified.

Corrected.

DPLU appreciates this suggestion, however, the word "designated" was removed based on comments provided by other planning groups (Crest-Dehesa).

Noted.

Noted.

This definition has been removed.

This definition has been removed.

These definitions have been removed.

General weaknesses of the Draft Plan.

1)The plan needs more emphasis on the importance of developing water resources, even though other agencies have lead responsibility for most projects. It is irresponsible to plan for 236,000 additional homes without a realistic plan in place for additional water, as the current supplies are marginal at best. Conservation, while important, can not provide for the minimal projected needs. The General Plan needs to emphasize and support local and statewide needs for infrastructure improvements including underground and above ground storage, Delta improvements, desalination and the treatment and reuse of waste water from sewage systems.

East of the County Water Authority boundary in groundwater dependent areas a mechanism for the purchase or exchange of development rights to areas within the CWA service area might help minimize potential future overdraft problems.

2) A second significant area of weakness in the plan is power/electrical energy. Again recognizing that the answers are only partly within the County’s jurisdiction this section needs enlarging and strengthening. Solar and wind are only part of the solution. Solar is expensive and doesn’t work well at night, and winds are erratic and the towers subject to the NIMBY syndrome. Geothermal is more reliable, but probably limited. All probably will require major new transmission lines. If CO2 reduction goals and requirements are to be achieved nuclear must be part of the answer.

A General Plan that fails to fully address and plan for water and energy needs is shortsighted at best, and likely will lead to the long term failure to achieve the Plan’s lofty visions and guiding principles.


Franklin L. “Woody” Barnes Jr
Vice Chair, Julian Community Planning Group.

This comment is appreciated and some revisions have been made to the narrative within the plan for more emphasis on the importance of water supply. It should be noted that the plan includes a substantial reduction over the number of homes included in the current general plan, one of the driving factors to this reduction is groundwater availability.

DPLU appreciates this comment and is further investigating mechanisms to allow for tranfers of development rights.

DPLU disagrees that the General Plan should include policies on nuclear power. It is extremely unlikely that nuclear power would ever be proposed for the unincorporated County. Therefore, any policy on nuclear power would likely be more of a political statement which is not appropriate for this General Plan.



Mr. Devon Muto,
 Chief Advance Planning and
 Mr. Bob Citrano,
 Planning Manager
 County of San Diego—DPLU
 5201 Ruffin Road Suite B
 San Diego, CA 92123

RE: Draft General Plan

Gentlemen:

We are grateful for the receipt and opportunity to comment on the Draft General Plan released November 14, 2008. As you no doubt are aware, our 15 person Community elected board has served the Palomar Mountain in a planning and land use oversight capacity for over 30 years, and through a specific subcommittee on GP2020, have taken every opportunity to input on the County's General Plan process, since its inception.

Our members have spent an extraordinary amount of unpaid volunteer time over the more than ten years of this project in tracking and commenting upon Plan progress. It is frustrating to have your Staff meet with us, tell us they understand our issues and concerns and then not see them represented in the Plan. We understand the nature of a General Plan and the FCI constraints, but ultimately we are most concerned with all the various impacts on our beloved Palomar Mountain. We are requesting a clear articulation of the 'status quo ante' to preserve and protect the natural resources and beauty we and thousands of others enjoy when visiting this Mountain, being reflected in the written words and Maps as they have been in various staff/Community meetings held earlier in 2008.

Additionally, this letter will first: comment on the text of the Draft with respect to the density plans for Palomar Mountain; second: share observations from a review of the Draft Maps available on the web site; and finally: transmit to you materials submitted earlier which may well be of value considering changes in staff, their responsibilities and the lengthy duration of the yet unresolved process.

DPLU appreciates the group's frustration and hopes to address it over the next several months through work on the North Mountain Subregional Plan and the FCI Redesignation.

First, a review of the 400+ page draft General Plan yields a superficially very well organized, thorough and clear exposition of all the relevant planning topics. Although we have voiced our dissent in the past on some of the assumptions (principally the treatment of small, rural communities and the Eastern County no-growth assumption), our principal deep, substantive concern continues to be the land use density approach you propose taking. Since there is at this time no Palomar Mountain or North Mountain detailed text, we will reserve comments and further ideas for these sections of a new Draft Plan.

A change in the one unit residential land required base acreage from the pre-FCI: 4, 8, 16, etc., acres to the one proposed, which uses a different and higher number (10, 20, 40, 80, Acres) seems inappropriate. It constitutes a **taking** for those with larger parcels, throughout the County, who have not divided their property before the adoption of this proposed Plan. For example in Palomar's prior 8 acre areas, the change to 10 acre minimum size for someone, say with an 80 acre never divided parcel reduces the yield from division from 5 parcels to 4, a twenty percent decrease or **taking**.

The change in 'base' exacerbates the taking via the existing 'odd' parcel sizes. For example, say a person had a 16-Acre parcel that had never been divided by the owner. Under the old Plan, 2-eight acre parcels could be created, under the new plan no further division would be possible, another example of what we believe would constitute a **taking**—this time of fifty percent.

Additionally, the change in 'base' serves no additional growth limiting purpose as the existing constraints of road size, slope and various set-back rules already protect the pristine character, history and ecology of our beloved Palomar. A density change as proposed serves only to provide a surface, window dressing of consistency throughout the County, while substantively constituting a significant '**taking**' to all the County's rural land owners, not just Palomar, without serving a substantial protective purpose.

It should be noted that we do understand the constraints imposed by the Forrest Conservation initiative. This now short-lived constraint in our view does not need to 'force' a systemic change in density base. If, as they say: "past is prologue" it is unlikely the Draft Plan would be fully adopted before the FCI sunsets. Absent significant health, safety or welfare advantages (none of which are articulated in the Draft), the equities and fairness of maintenance of the existing density base should be retained.

Second, little detail as relates to the North Mountain, or Palomar specifically, exist on the Draft Maps (both Proposed and Referral Maps), so little comment can be made. The significant deficits noted, however, include:

--Lack of accurate representation of existing Commercial and higher density rural land use areas (a Map showing this is attached as Exhibit #1); 

--Lack of any indication of the Telecommunications Overlay, restricting towers to certain acceptable areas (a County Map showing this is attached as Exhibit #2); 

DRAFT RESPONSES

Noted.

Staff does not concur that this would constitute a "taking." The parcel could still be developed, although the density and number of units assigned would be more reflective of the physical constraints and availability of infrastructure. For a "taking" to occur, all value would need to be removed from the land.

Refer to previous response.

Refer to previous response regarding the issue of "takings." DPLU also notes that reasons for the proposed densities are discussed within past planning documents and the draft General Plan.

Noted.

The draft maps are available at parcel specific detail. Small and large scale maps and an interactive GIS mapping application are available. Additional custom scale maps are available upon request from DPLU staff.

General Plan maps show land use designations and do not always reflect existing land uses.

The Telecommunications Overlay General Plan designation is proposed for elimination and, therefore, is not shown.

January, 03, 2008

--Incorrect representation of the PMPO geographic planning area boundaries;

With each piece of correspondence and each meeting, on Palomar or at DPLU, since the inception of this Planning cycle, we have emphasized Palomar's history as a Country Town (or modern day equivalency) along with the concomitant commercial property designations and clustering or higher density near the commercial center of our rural community—all of which are not indicated on either the Maps (in any version seen thus far) or in the Plan text. We note you have the population of Palomar increasing from 245 to 520 in your projections. This requires, in our experience, a greater supportive commercial infrastructure. Please note, as the home of the world famous Observatory here, we also have to attend to the needs of hundreds of thousands of visitors each year. The County's General Plan must allow for these realities.

Finally, enclosed with this letter are the following documents which we have developed and previously shared with Staff as a part of the creation of the General Plan represented by the November 14 Draft. These are being submitted once again as there has been so much Staff turnover during the course of this cycle of Planning; we want our views to be known and considered.

--Our Principal 'theme', the Three "C's" Letter of 9-29-01; 

--Community Specific Plan comments and letter of 11-14-01; 

--Community comments to Eric Lardy of 6-28-08 with proposed map. 

To reiterate our initial and ongoing request, in summary, we are looking for recognition of Palomar Mountain as the small country town that it is (by whatever nomenclature you choose to use) with WRITTEN language in the Plan or from our Board of Supervisors, giving us the recognition of our long standing commercial uses with some flexibility for previously existing higher density residential development at or around our existing businesses:

<http://www.mypalomarmountain.com/businesses>

Sincerely,
Palomar Mountain Planning Organization



Glenn Borland
Chairman

Cc: Board of Supervisors w/attachments

DRAFT RESPONSES

The PMPO is not an official Community Planning or Sponsor Group and, therefore, is not shown on the maps.

The County does not have the ability to provide designations in conflict with the Forest Conservation Initiative.

DPLU believes that the groups desires can best be recognized through the North Mountain Subregional Plan and the FCI Redesignation.

January 23, 2009

DRAFT RESPONSES

Mr. Eric Lardy

Department of Planning and Land Use

5201 Ruffin Road Suite B

San Diego CA, 92123

Dear Mr. Lardy,

At our regular monthly meeting on January 13, 2009, **The Pine Valley Community Planning Group** reviewed the Draft General Plan with the following comments, by page number.

Page 1-5 2nd paragraph, put in the County's website.

1-14 Wrong spelling of Morena for picture caption.

1-26 Should be rural communities. Should Guatay & Mt. Laguna be added?

2-3 Who we are = low-density is incompatible with clustering.

2-14 Guiding principle 10 = low density rural character is incompatible with clustering.

3-3 Mountain Empire – Campo – Lake Morena is the name of the Planning Group.

3-12 Medium impact and high impact industrial is not compatible with rural lands.

3-17 No caption on lower picture.

3-19 19 expiration = typo

3-35 Why are private water companys not listed?

The County's website has been added.

Corrected.

"Rural" added. List includes major communities, therefore, Guatay and Mt. Laguna are not included.

This statement is not necessarily true. For example, the density of 10 du/100 ac can be designed in various ways.

See above.

This statement is not correct. The Subregional Planning Area is the Mountain Empire. Campo has also been added.

No change. These uses currently exist in rural lands.

Caption added.

Corrected

Private water companies are too numerous to include in the figure.

DRAFT RESPONSES

3-39 LU 13.2 = typo

4-5 Along with including grammer.

4-20 Last paragraph = is poor the proper word?

5-9 = Pine Valley 100 YR flood plain is not shown.

5-14 Cos-6.4 mention Williamson Act.

5-16 Cos-7.6 San Diego State University

5-25 Old Highway 80 is a National Scenic By-way as of October 21, 2006.

5-35 LU-18.2 should be Cos-18.2

7-4 and 7-5 Goal 5-1.5 is listed as 5-2.4 on page 7-5.

7-6 Map needs to be updated.

Corrected.

Corrected.

Term removed.

It appears that the line for "river" in the Pine Vally area is covering the FEMA mapped floodplain. The figure will be revised to improve legibility.

The benefit of mentioning the Williamson Act is not clear.

Revised as suggested.

Added.

Corrected.

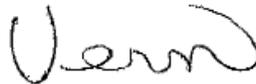
Duplicate Policy S-1.5 has been removed.

Map has most current data available (2004), but fire boundaries have been added (2007).

Thank You

Sincerely,

Vern Denham, Chair



Pine Valley Planning Group

PO Box 67

Pine Valley, CA 91962

Potrero Community Planning Group
P.O. Box 9
Potrero, CA. 91963

DRAFT RESPONSES

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

**Subject: Comments on the San Diego County's Draft General Plan dated November 14, 2008
approved by the Potrero CPG December 11, 2008**

- 1) Page 1-14--- The picture is NOT of Lake Moreno. Corrected.
- 2) Page 2-8—First paragraph- In tum, these would be surrounded by "Rural Lands" characterized by very low-density residentialetc. Revsion made as suggested.
- 3) Page 3-26---Middle of page- Additional goals and policies that relate to natural resources are contained in the Conservation and Open Space Element insert page # , while those related to natural hazards are in the Safety Element insert page #. Addition of page number will be considered with final version of General Plan.
- 4) Page 3-26---Bottom of page- where it states Refer to the Agricultural Resources..... Insert page # See above.
- 5) Page 3-27--- Middle of page- same format as above insert page # See above.
- 6) Page 5-14—Policy COS-6.2--- Third bullet, does this policy relax the existing land Use regulations that allow a density of 2/4/8 AC parcels in an AG 19 designator? If it does will this represents a staggering 100% increase in allowable density. In addition, are there criteria that are carried over? This policy has been modified to clarify this issue. It does not alter density.
- 7) Page 3-26---Policy LU-7.2--- Overview- The reduction of parcel sizes from the County-wide average of just over 20 acres for intensive agricultural parcels down toward parcels less than 2 acre size would have a significant negative impact on the local agricultural industry. What is particularly insidious about this, kind of development is that, once it has begun, there are increasing pressures for other surrounding parcels to be divided into smaller ones. The use of cluster zoning is to create more aesthetic rural development for the new residents, not farmland preservation, thus further fragmenting agricultural land. The groups position is noted. Numerous stakeholders including the Farm Bureau have advocated for this concept as a method of retaining agricultural lands in San Diego.
- 8) Page 3-33—Policy LU11.8—Please explain what are "Permitted Secondary Uses" and give examples. An example of a secondary use would be a deli in an industrial park. A definition has been added in the glossary to clarify the use of this term.
- 9) The Mobility Element should incorporate in Goal M-8 Public Transit System- Transit Load share Goals. It is not clear what this comment is suggesting.

Sincerely,

Carl Meyer
Chairman Potrero CPG
P.O. Box 9
Potrero, CA. 91963

Rainbow Planning Group

Keeping Rainbow Rural
Advising The Board of Supervisors ~ San Diego County

DRAFT RESPONSES

February 5, 2009

Dear Mr. Muto,

On behalf of the Rainbow Planning Group I would like to congratulate your group for the progress being made on San Diego County's General Plan and we also would like to thank you for allowing our community to contribute to this very important document.

After thorough review, the Rainbow Planning Group offers the following changes to the Draft General Plan in order to facilitate and protect existing quality of life norms for county residents. We wish to ensure that future infrastructure would be sustainable in a manner consistent with extended development.

1. The last paragraph of page/section 3-34 implies that the SDCWA is guaranteeing the supply of water through 2030. We believe given the recent court challenges, which have truncated recent water availability, that this may not be true today. Secondly, recent court challenges have put the onus on individual water districts and developers to prove that they have the resources to fulfill their supply contracts for new developments. These proofs are required to extend over a significant time period. We believe the paragraph mentioned above should be deleted from the GP so as not to imply the County is a guarantor of water supplies based on SDCWA statements.
2. We would like to amend Goal LU 13.2 to read, "Commitment of Water Supply. Require new development to identify continuous and sustainable water resources to support development prior to approval." Water is a limiting factor to our future development and we would like to encourage public and private cooperation to meet all our future water needs.
3. We would like to also amend Goal LU 12.1 to read, "Infrastructure and Services with Development. Infrastructure, facilities, and services will be in place prior to the onset of the construction project. Creative mitigation strategies will not be accepted". We believe that enforcing "concurrent" infrastructure activities or fees is impossible to enforce and leads to interpretive abuse by all parties.

Thank you very much for your consideration and we look forward to attending the meetings on the 28th of February.

Sincerely

Paul T Georgantas

Secretary, Rainbow Planning Group

This paragraph has been revised. With the revisions, DPLU believes that the group's concerns have been addressed.

DPLU appreciates the recommendation but believes that the policy is appropriately written as new development must often rely on a water district's expertise to determine whether supplies will be adequate for the development.

This policy has been revised to use "prior to" which DPLU believes addresses the group's primary concern.

*****RAMONA COMMUNITY PLANNING GROUP*****

15873 HWY 67, RAMONA, CALIFORNIA 92065

Phone: (760)803-2001

DRAFT RESPONSES

January 29, 2009

Devon Muto, Interim Chief
Department of Planning and Land Use
5201 Ruffin Rd., Ste. B
San Diego, CA 92123

RE: SAN DIEGO COUNTY DRAFT GENERAL PLAN – COMMENTS

The Ramona Community Planning Group reviewed the Draft General Plan at the meeting of January 26, 2009. A recommendation was made to send changes/comments as proposed, and it **passed 11-1-0-3**, with 1 member voting no, 2 members absent, and 1 member resigned. The following comments are submitted for consideration:

- GOAL LU-12, LU-12.2: **Maintenance of Adequate Services.** Require development to mitigate significant impacts to ~~maintain~~ existing service levels of public facilities or services for existing residents and businesses.
- GOAL LU-13, LU-13.1: **Adequacy of Water Supply.** Coordinate land use planning with water infrastructure planning in areas within the CWA boundary to maintain an acceptable availability of a high quality water supply.
- GOAL LU-14, LU-14.4: **Sewer Facilities.** ~~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. ~~Sewer systems and services shall not be extended beyond Village boundaries except when necessary to preserve open space or serve civic facilities.~~
- GOAL LU-14, LU-14.5: **Alternate Sewage Disposal Systems.** Support the use of alternative on-site sewage disposal systems ~~when conventional systems are not feasible and~~ in conformance with state guidelines and regulations.

The suggested revision uses terms that are less defined when it comes to public services. DPLU believes that the use of “maintain” sets a more clear and enforceable criteria.

Coordination of land use and water planning is also applicable in areas outside the CWA that are served by other water districts and water companies.

The proposed revisions appear to be in conflict with the majority of comments received from the Steering Committee.

The County prefers that all options to use conventional systems be explored prior to consideration of alternatives. Conventional systems are typically more reliable because they are more common and require less maintenance.

Sincerely,

s/Kristi Mansolf, Secretary FOR

CHRIS ANDERSON, Chair
Ramona Community Planning Group

SAN DIEGUITO PLANNING GROUP

P. O. Box 2789, Rancho Santa Fe, California 92067

DRAFT RESPONSES

January 28, 2009

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

Re: COMMENTS TO THE DRAFT GENERAL PLAN UPDATE DOCUMENT DATED NOVEMBER, 2008

Dear Devon:

Thank you for the opportunity to comment on the draft General Plan Update. Following are those comments:

1. Extremely restrictive words, such as *require*, *avoid*, *prohibit*, and *shall* are found throughout the document. Although necessary in some areas, these restrictive words need to be used carefully with understanding of the restrictive nature. The Community Plan texts may not require and/or may encourage the type of development these words prohibit, thus preventing the Community Plan text to be supported by the County General Plan.
2. Guiding Principle 2, pg 2-7 A Village "limit line" is not utilized throughout text, but is referred to as "Village Core", yet has no definition of how to determine the village "limit line".
3. Guiding Principle 2, pg 2-8 Discussion and definition of "the strict correlation of parcel size with density may be contrary..." and "clustering of housing units adjacent to one another on one-acre lots..." should be better clarified as to the intent to clustering in a rural environment (that which would have homes on one-acre parcels)
4. Guiding Principle 7, pg 2-12 "Wastewater should be re-used for irrigation, toilets, and other suitable purposes..." What does policy provide to enforce this mechanism? What if there are no systems to allow for recycled water in the vicinity?
5. Land Use Element/Community Plans, pg 3-3 "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..." The development of a parcel has to be delayed until when? In this Special Study Area, where are these Special Study Areas and how would they affect Villages and adjacent properties? What kind of plans would be prepared and for whom? And who would finance these plans?
6. Land Use Element/Table LU-1, pg 3-12 Footnote a. allows Community Plans to override the General Plan. This is a direct conflict and cannot be implemented. This needs to be re-defined.
7. Land Use Element/LU-3-2, pg 3-23 This is not well defined and can invite inappropriate development in a community.
8. Land Use Element/Community Services and Infrastructure, pg 3-34 With regard to the water supply, "...The plan concluded that if existing supplies remained reliable and projected supplies are developed as planned, no shortages are anticipated within the Water Authority's service area under single dry-year or multiple dry water years through 2030..." This is an outrageous statement, considering many water districts are gearing up for

1. Noted.
2. The term "limit line" has been revised to be a "boundary" and a definition has been added to clarify.
3. This paragraph has been modified to clarify discussion.
4. This is not a policy. It is supporting text to a guiding principle. See Policy COS-19.2.
5. This policy allows for Community Plans to identify areas that require additional planning and to set forth a strategy for dealing with new developed before plans can be completed. The approach can vary by community. Examples of areas that could benefit from this are the Buena Creek Sprinter Station and Valley Center villages.
6. DPLU does not agree. This table provides a default FAR range unless more specific planning is provided in Community Plans.
7. DPLU anticipates developing guidelines as part of the General Plan implementation to better define this requirement.
8. This paragraph has been revised to better reflect general water planning conditions.

drought conditions and restricted water usage. This statement allows development without regard to adequate water resources. State agencies have already curbed current water supplies to our region.

9. Land Use Element/Goal LU-12, Policy LU-12.1, pg 3-38 Allows for infrastructure and services to be developed concurrently with development. These important elements of any development should be provided prior to construction of the development, thus ensuring the infrastructure needs are immediately met upon occupancy of the development.
10. Land Use Element/Goal LU-14.4, pg 3-39 This creates undue restriction on properties that are already in place. It needs to be better defined so it applies only to those areas where sewer facilities would induce increased growth, yet not restrict an existing home outside the boundaries in need of sewer.
11. Mobility Element/Parking Context, pg 4-23 *"Providing an ample supply of free parking supports and automobile-oriented society, while downplaying transit, walkability, and safety...."* So does this mean all through the County parking meters should be installed in every parking spot?
12. Mobility Element/Goal M-10.3, pg 4-24 This being Required is problematic for the aesthetics of a village environment. The intent is not well relayed and this goal should be re-worded.
13. Mobility Element/Goal M-10.4, pg 4-24 Incorporating shared parking can be quite problematic and encourages parking shortages. This should not be implemented.
14. Mobility Element/Roads Where a Lower Level of Service is Deemed Acceptable, pg 4-32 Camino del Norte is classified with two classifications, when the references are actually different road segments in different communities. The 6.2 Prime Arterial from Camino San Bernardo (San Dieguito) to San Diego city limit (San Dieguito) should be moved to a different section of the chart, allowing for a more definitive segregation.
15. Conservation and Open Space Element/Goal COS-6.2, pg 5-14 the e.g. in parentheses in bullet point 3 should be removed. It is inappropriate.
16. Conservation and Open Space Element/Energy & Sustainable Development There needs to be more information and policies for wind energy. It is not well developed in this document.
17. Conservation and Open Space Element/Goal COS-14.13, pg 5-33 This needs to be removed. It allows development to circumvent necessary channels of review.
18. Conservation and Open Space Element/Policy COS-19.1, pg 5-36 The defining of which "preceding policies" this should refer to needs to be done here.
19. Conservation and Open Space Element/ Policy COS-20.1 & COS-20.2, pg 5-36 These two policies require action now, but once begun, established, and/or completed, should this document continue to be worded in this fashion for the future?
20. Housing Element/Policy Framework pg 6-10 There needs to be reference to requirement to identify adequate water supply. (maybe a policy placed in Goal H-1)
21. Housing Element/pg 6-10 In the last paragraph, it encourages clustering without sewer but one of the primary requirements for clustering is sewer. This contradicts its own policies.

DRAFT RESPONSES

9. Revised as suggested.
10. Revision have been made to this policy to clarify. It is not clear what revisions this comment is suggesting.
11. This statement is within the context and provides background information to inform the reader.
12. This policy has been revised.
13. This strategy is already being implemented successfully in some communities.
14. This has been corrected. The 2 lane segment should be El Camino del Norte.
15. This bullet has been revised and the language referred to has been removed.
16. DPLU does not agree with the need to address wind energy in greater detail within the General Plan. As currently written, the draft General Plan is supportive of renewable energy technologies but recognizes that potential adverse impacts from projects must be addressed.
17. DPLU does not agree. Expediting does not equate to eliminating steps of review.
18. Reference to preceding policies has been removed.
19. These policies have been revised so that they will also be applicable to the ongoing maintenance of these programs.
20. This issue is already addressed with Policies LU-13.1 and 13.2 The Relationship to other GP Elements section on page 6-8 has been revised to provide an additional reference
21. Clustering can still be done without sewer (i.e. 1 acre lots opposed to 8 acre lots).

DRAFT RESPONSES

22. Housing Element/Policy H-3.6, pg 6-14 Concern for how this policy will be implemented and where?
23. Housing Element/Policy H-5.4, pg 6-15 Taken out of context, this statement has inferences not intended, and inappropriately encourages densities where it may not be welcome. This should be re-worded to clearly state its intentions.
24. Housing Element/Policy H-6.4, pg 6-16 I didn't know the County was in the business of developing their properties. Wouldn't that be a direct conflict of interest to itself?
25. Safety Element/Flood Hazards Context, pg 7-17 *"...recognizing that there may be instances where encroachment is warranted."* Is an unnecessary phrase that should be removed and contradicts not only the beginning of the sentence, but the policies discouraging development in the floodplains.
26. Safety Element/Goal S-12 & Goal S-13 Somewhere within the policies, add phrasing to accommodate visibility of the facilities as an inherent deterrent to crime within the community.
27. Noise Element/Goal N-1 Provide a policy to encourage use of surface materials that minimize the traffic noise. (The County has paved several roadways in our area that have significantly reduced the noise pollution from automobile tires by utilizing recycled rubber)
28. Glossary/Agriculture, pg 10-6 Is the word, *"prime"* unnecessary to define pastureland, or is it a recognized term (note definition of Farmland of Statewide Importance & Farmland of Local Importance?)
29. Glossary/Air Pollution, pg 10-7 Is all air pollution man-made? If so, change *"human"* to *"man-made"*, otherwise change the phrase to *"...or other unnatural activity that damages the quality of the air"*
30. Glossary/Detached, pg 10-14 change *"house"* to *"building"*
31. Glossary/Development, pg 10-14 Although development SHOULD be approved by the County, it isn't always!
32. Glossary/Domestic Wastewater, pg 10-15 Grammatically incorrect. Should read, *"...occupied as living quarters by humans."*
33. Glossary/Independent System Operator (ISO) what grid?
34. Glossary/Industrial User, pg 10-21 What does this mean??
35. Glossary/Local Road/Street, pg 10-23 Would like to see a better definition for this term, perhaps change to, *"...for access to and for adjacent properties."*
36. Glossary/Multi Species Conservation Plan, pg 10-24 Add the acronym in parentheses, (MSCP)
37. Glossary/Non-Peak Delivery, pg 10-25 Peak is not defined, what is peak day, for instance?
38. Glossary/Open Space, pg 10-25 remove the word, *"natural"* at the beginning of the definition. Not all open space is natural.
22. This policy is mainly being implemented through strict compliance with State law. Refer to the current farm employee housing ordinance in process by DPLU.
23. Revised as suggested.
24. Long-term leases or disbursement of land through a public process to interested developers is a strategy commonly employed by public agencies to develop lands.
25. This sentence has been revised to clarify its intent.
26. This issue is addressed with Policy S-14.2.
27. This reduction measure has been added to the list under Policy N-1.2.
28. This definition has been removed.
29. This definition has been removed.
30. This definition has been removed.
31. This definition has been revised.
32. This definition has been removed.
33. This definition has been removed.
34. This definition has been removed.
35. This definition has been revised.
36. Revised as suggested.
37. This definition has been removed.
38. This definition has been removed.

From: San Dieguito Planning Group

DRAFT RESPONSES

39. Glossary/Pedestrian-oriented, pg 10-27 remove the phrase, “...locating parking to the rear of buildings...” The parking location is not necessarily in the rear and is not pertinent to defining pedestrian-oriented.
40. Glossary/Pollutant, pg 10-28 Aren't pollutants also defined as unnatural particles in the air? Shouldn't “...of wastewaters...” be removed?
41. Glossary/Sewerage System, pg 10-32 is that the correct spelling?

39. This definition has been removed.
40. This definition has been removed.
41. This definition has been removed.

The group's position is noted. Both the Land Use Map and Mobility Map provided in the Draft General Plan include Harmony Grove.

Further, San Dieguito Planning Group supports the County's draft Land Use Alternative Map of March 2008 that was preliminarily approved for modeling by the County Board of Supervisors, and not the Referral Map of March 2008. The Planning Group is very concerned that the northernmost boundaries of the San Diego Planning Group do not include Harmony Grove, as was intended during this update process. We were advised this adjustment was a technicality that would happen during this process. As such, it should be reflected on these maps appropriately.

Please do not hesitate to contact me if you have further questions or comments.

Sincerely,

Lois A. Jones

Lois A. Jones
San Dieguito Planning Group

Cc: Paul Marks, Chairperson
San Dieguito Planning Group

(sig on file)

**VALLE DE ORO COMMUNITY PLANNING GROUP
SPECIAL SUBCOMMITTEE REPORT
DRAFT GENERAL PLAN**

DRAFT RESPONSES

Pg. 1-26 ¶ 2 (PHYSICAL SETTING): Delete last sentence regarding candidates for future redevelopment plans. The comment is not appropriate in describing the physical setting of the county.

Pg. 2-8 ¶ 2 (GUIDING PRINCIPLE 2): Delete entire paragraph because it establishes precedent for disassociating parcel size from density which leads to automatic or “by right” clustering.

LU-5.2 (Sustainable Planning and Design): Delete “consider and” and “when feasible” because their use eliminates any requirement for sustainable planning and design.

LU-5.4 (Planning Support): Delete entire ¶ because heat-island effect negates benefits.

LU-6.1 (Environmental Sustainability): Replace “Support” with “Require”.

LU-6.4 (Sustainable Subdivision Design): Insert “and/or” prior to “provide” and add “when appropriate and consistent with the applicable Community Plan”.

LU-9.11 (Integration of Natural Features in Villages): Replace “Promote” with “Require” and delete “when appropriate”.

LU-11.7 (Office Development Compatibility with Adjoining Uses): After “patterns of” add “office development, including office parks, with...”

LU-14.4 (Sewer Facilities): Rewrite last sentence to read: “Sewer system and services shall not be extended beyond Village boundaries or an extant Urban Limit Line except when necessary to serve failing septic systems or to protect the public health and safety.”

TABLE M-3 (Criteria for Accepting Level-of-Service E/F Roads): Table does not address insufficient State Route connectivity which is the reason for accepting Level E on Fuerte Drive.

M-10.3 (Parking for Pedestrian Activity): Delete ¶ because it requires maximizing use of on-street parking to meet parking requirements.

Pg. 4-33 (Roads Where a Lower Level of Service Is Deemed Acceptable): Table falsely implies Fuerte’s Level of Service is OK without requiring needed SR-94/SR-125 interchange.

COS-2.1 (Restoration and Enhancement): Change “Encourage” to “Require”.

COS-3.1 (Wetland Protection): Delete last sentence.

TABLE COS-1 (County Scenic Highway System): Table is incomplete. Add SR-125 from SR-94 to I-8, SR-54 from SR-94 to City of El Cajon, Fuerte Drive from I-8 to Chase Avenue, Willow Glen Drive from Jamacha Road to Dehesa Road, and Avocado Blvd from SR-94 to City of El Cajon.

COS-11.1 (Protection of Scenic Resources): Change “encourage” to “require”.

COS-11.3 (Development Siting and Design): Delete 5th bullet regarding clustering. This bullet makes clustering a requirement.

Page 1-26. The sentence has been deleted.

Page 2-8. This paragraph has been moved to Guideline Principle 4 and revised.

LU-5.2. Revised as suggested.

LU-5.4. DPLU does not agree with this modification. Heat-island effect can be mitigated by landscaping, color, and open space preservation.

LU-6.1. This sentence has been revised as suggested and with additional revisions.

LU-6.4. The later suggested revision was made without “when appropriate.” These are concepts that should be required of every project.

LU-9.11. Revised as suggested.

LU-11.7. Revised as suggested.

LU-14.4 This policy has been revised in response to this and other comments.

Table M-3. This issue has been added to the Regional Connectivity category of the table.

M-10.3. This policy has been rewritten based on this and other comments.

Page 4-33. Modifications have been made to address this.

COS-2.1. DPLU does not agree with this modification as it would be a significant change in current policy. Development is currently not required to restore habitat except for mitigation purposes.

COS-3.13. Revised as suggested.

Table COS-1. Roads added as recommended.

COS-11.3. Revised as suggested.

COS-11.3. This bullet has been revised per other comments.

DRAFT RESPONSES

Page 2 of 2: SPECIAL SUBCOMMITTEE REPORT, DRAFT GENERAL PLAN

COS-11.5 (Collaboration with Private and Public Agencies): Change “Encourage” in last sentence to “Require”.

COS-13 (Dark Skies): Delete “in rural areas and near major observatories”. The goal should be preservation of all dark sky areas.

COS-13.1 & 13.2: Improperly numbered 12.1 & 12.2. Also change “Minimize” to “restrict”.

COS-14.3 (Sustainable Development): Change “consider” to “use”.

COS-15.1 (Design and Construction of New Buildings): Change “Encourage” to “Require”.

COS-17.2 (Construction and Demolition Waste): Delete “where appropriate”.

Pg. 6-2 ¶ 3 (Housing Element): Delete last sentence because it is untrue and it does not affect meeting the overall Regional Housing Needs Allocation.

Pg. 6-4 (Smart Growth Opportunity Areas): Map falsely depicts much of Valle de Oro as Village Regional Category.

Pg. 6-10 ¶ 5 (Housing Development): Delete paragraph because clustering “small” lots doesn’t work without sewer service and will not reduce land costs.

S-9.4 (Development in Villages): In first sentence, change “mitigated” to “avoided”.

S-9.5 (Development in Semi-Rural and Rural Lands): Delete all after “capacity of floodplain”. This clearly would allow development and necessitate channelization of our already severely impacted floodplains.

Table N-1 (Pg. 8-9; Noise Compatibility Guidelines): Table needs complete revision because “acceptable” noise levels are 10-15 dB too high for residential and commercial and are not time based. (See approved POD08-009 for County Standards.)

COS-11.5. Revised as suggested.

COS-13. This goal has been rewritten.

COS-13.1 / 13.2. Numbering corrected. Policy 12.1 revised as suggested.

COS-14.3. Revised as suggested.

COS-15.1. Revised as suggested with additional revisions to improve readability.

COS-17.2. Revised as suggested.

Page 6-2. This sentence has been revised to accurately describe the General Plan.

Page 6-4. Revised as suggested.

Page 6-10. DPLU disagrees. Larger lots can be clustered into smaller lots that are still greater than 1 acre.

S-9.4. Avoiding is more onerous than mitigating and is a much more stringent policy than what is currently required. This change was not made.

S-9.5. Staff does not agree. Currently, development is not restricted from the floodplain fringe. This policy provides greater restrictions with some allowances so as not to unreasonably restrict existing properties.

Table N-1. This table is focused on land use compatibility where the Noise ordinance provides standards for noise generation on a specific property. Staff believes that the table is appropriate.

DRAFT RESPONSES

To: San Diego County DPLU

Fr: Valley Center Community Planning Group

Re: Comments on Draft GPU, all except Mobility Element

Thank you for the opportunity to comment on the General Plan Update Draft Goals and Policies. It's obvious that a lot of work and thought went in to this document. We hope that these goals and policies, if approved, will lead towards revisions to the Land Use and Circulation maps that are currently in the EIR process. We look forward to working with you to identify where the goals and policies can be applied to the Valley Center community in order to achieve the GPU goals.

Overall

Each Element has a section titled Relationship to Other GP Elements. The format of this section is inconsistent between each Element. Also, they need to be cross-referenced between each other. For example, the Noise Element lists the Housing element, however the Housing Element does not list the Noise Element.

Chapter 1 – Introduction

1. There is no mention of the Community Plans in this chapter. Add Community Plans:
 - On page 1-3 in pyramid of Legal Authority
 - In How is it Organized section
 - How to Use the GP section
 - Public Outreach and Involvement section
 - Related Documents section
2. In the Global Climate Change: AB 32 Compliance section, add a reference to the newly passed state law - SB 375.
3. In the Physical Setting and Community Planning Areas section, page 1-26, Valley Center should not be in the paragraph that lists those communities that have a greater capacity to grow. We should be in the second group of that paragraph for the following reasons:

“Rugged terrain, agriculture, and sensitive environmental habitats, as well as limited road networks and public services, limit growth in these areas. With few exceptions, these communities are sparsely populated and lack the infrastructure and employment opportunities to support anything more than limited population growth. With the exception of some limited areas of sewer service, these communities rely largely upon septic systems. Without imported water, groundwater is also a limiting factor to growth. Further, this area of the County contains a substantial amount of public lands, tribal land, and land affected by the Forest Conservation Initiative (FCI). Residents in these communities desire to preserve the existing rural setting and character.”

Chapter 2 – Vision and Guiding Principles

Again, no mention of the Community Plans or the concepts that they bring.

1. In the introduction to the Guiding Principles (page 2-6), a definition of “reasonable share” of projected regional population growth is needed. Also, need to substantiate

DPLU agrees with the cross-reference comment but does not agree that a precise format needs to be applied consistently to each section.

Revisions have been made to these sections as appropriate to add references to Community Plans.

Reference added.

While DPLU agrees with the constraints described in the comment, it does not appear consistent to move Valley Center from the first group. The growth projected under the General Plan Update does not support it.

DPLU disagrees. The “reasonable share” will be defined with adoption of the General Plan and its projected capacity.

the assertion that people in the future are “likely to gravitate” toward existing urbanized areas. What is the citation for this?

2. Guiding Principle 3 should add the importance of working with each community as development occurs to ensure the principle can be met.
3. Guiding Principle 3 should include trails and pathways in the last sentence.
4. Guiding Principle 6 should include a reference to pathway/trails or better yet, the Regional and Community Trails Master Plan.
5. Guiding Principle 6 needs to expand the definition of “multimodal” to include the opportunity for 21st century solutions/technologies.
6. Guiding Principle 9 should show a willingness to be open to new technologies and solutions to encourage cost effectiveness.

Chapter 3 – Land Use Element

1. All of the GPU (formerly GP 2020) planning at our Community level has been based on a consensus from our Community Planning Group requiring an equitable and timely equity transfer mechanism(s) (eg. PDR-Purchase of Development Rights and TDR-Transfer of Development Rights) to be done concurrent with the GPU process for all downzoned properties (not just farmers and agricultural lands). It was with this firm understanding that our Valley Center Community decided to proceed with our involvement in the GPU planning process. To date, we have not seen any evidence of this in the Draft General Plan.
2. Table LU-1:
 - a. Public Facilities are not compatible with any category. Where will they be located? The Village and perhaps all three categories should be checked.
 - b. Open Spaces for Conservation and Recreation are especially essential in Village areas, and in Semi-Rural Areas. What is the definition of Recreation here?
 - c. Other land Use Designation section – Open Space - Conservation: The term ‘large areas’ is too subjective and should be quantified.
3. Policy LU-1.4: Change to read “Prohibit leapfrog development which is inconsistent...”
4. Policy LU-1.5: Clarify or define “livable communities”. There’s much too much room for interpretation here. Cite the body of work to which this concept is referring so that it can be understood by regulatory planners and developers who have little knowledge, understanding or appreciation of urban planning or design concepts.
5. Goal LU-4: WATER Authorities and Districts should be a distinct category of separate jurisdictions requiring coordination with land development.
6. Goal LU-5: Change goal to read Use associated development... To open the Goal with the phrase “A land use plan that...” is not consistent with the rest of the document and is the outcome, not the goal.
7. LU-5.2: This policy promotes clustering merely to “conserve land”. The conservation purpose needs to be much better qualified in order to ensure projects that individually build around a site’s natural assets and collectively preserve contiguous stretches of these. This policy enables bunching homes together for any reason that strikes the applicant whether or not clustering meets a larger community purpose.

DRAFT RESPONSES

The assertion mentioned in the comment is based on the location of current and future jobs in the San Diego region, a key driver in population growth and attraction.

Guiding Principles 3 and 6 have been revised as suggested with the exception of the reference to 21st century solutions, which seems vague and unnecessary.

Revised as suggested.

DPLU has continually communicated that the only equity mechanism it is currently investigating is a PDR for agricultural lands. We have also begun researching TDR possibilities that could be implemented post-approval. However, this would not address the group’s desires.

This has been corrected.

The description of this designation will be updated to clarify its applicability.

This description has been revised to better describe its implementation.

Revised as suggested.

Term “livable” has been removed.

Refer to Goal LU-13.

DPLU does not agree with this suggestion. All goals in the document are written as outcomes.

DPLU does not agree that the suggested detail need to be added to this policy. Such detail will be developed as part of the implementation.

8. LU-5.6: New policy – Allow and encourage co-location of new technologies that will use the same transit facilities for multi-modal transportation.
9. LU-6.1: Change to 'Protect natural resources and the long-term sustainability of the natural environment.'
10. LU-6.3: Change 'Support' to 'Encourage'.
11. LU-6.7: Change to 'Require contiguous open space areas; encourage is too weak to produce the result.'
12. LU-6.10:
 - a. Change to "Minimize development in hazardous wildfire areas and other immitigable hazardous areas. The way it reads now presumes that land use designations pre-determine whether an area is hazardous or not. This is misleading.
 - b. The land use maps should be updated to meet this goal as it was not considered when developing the maps.
 - c. Define 'immitigable hazardous areas'
13. Goal LU-7: Construction is confusing, change to "Retain and protect farming and agriculture"
14. LU-7.1 and LU-7.2: These policies are inadequate for achieving the stated goal of retaining and protecting agriculture in San Diego County. The failure to protect agriculture and food production in California and throughout the United States seems to be a fundamental and significant problem with this General Plan, and, according to many reports, most others as well. Perhaps others with expertise in this area should address this issue. It would seem that agriculture is essential-enough to the San Diego County economy to be addressed either as its own element or under LAND USE instead of as a sub-category of CONSERVATION and OPEN SPACE.
15. LU-7.3: New policy – Encourage agriculture uses in order to reduce carbon footprints.
16. LU-8.3:
 - a. add – Discourage development that would draw down or contaminate the groundwater table to the detriment of groundwater-dependent habitat.
 - b. Define 'groundwater-dependent habitat'.
17. Villages and Town Centers: Throughout this section there are two issues:
 - a. Sentence construction sometimes confuses goals for the plan with goals for the community. For instance Goal LU-9.2: is not to "Assign Village land use designations in a manner that is consistent...." The goal is "Village land use designations are consistent"
 - b. The language paints a desirable Vision for Village development, but is too tentative and vague to bring about what it suggests. There are too many qualifiers, for example: "Under ideal circumstances; Villages would; new

DRAFT RESPONSES

This policy is not clear (What new technologies is this referring to?) and does not appear appropriate for the Land Use Element.

DPLU believes the current wording is appropriate.

This suggestion appears to be in conflict with general Steering Committee input.

Policy revised as recommended.

DPLU does not agree with this comment. As written, the policy has a clear connection to assignment of land use designations.

DPLU does not agree with this comment. Areas that are remote and/or unserved by fire stations have received very low densities. Unmitigable hazardous areas — areas exposed to hazards that cannot be adequately mitigated.

The suggested change is not consistent with other goals.

The location of goals and policies within a General Plan does not alter their force and effect. All goals and policies carry equal weight.

The issue is addressed under Policy LU-5.3.

DPLU does not agree with this suggestion. While it is not opposed to the policy, it does not agree that it is a relevant issue and is concerned that it may result in unnecessary investigations from new development. Staff also believes that it is best to define what is groundwater dependent in implementing documents.

LU-9.2 is a Policy, not a Goal. As written, it is consistent with other policies.

While DPLU understands the concern, the comment is on the background text where there is less need for mandatory language. Due to the vast diversity in communities that this plan covers, the text was written for flexibility.

development can facilitate; such mechanisms should ensure that new development be compatible with overall scale and character ...”

18. LU 9.1: (replace photo or change caption). This Bonsall shopping center IS more successful than many in terms of its human scale and mass, its respect for community character, and its nod to pedestrian accommodation -- especially considering that the center is isolated from residential development. But, this shopping center is still oriented mainly to automobiles and shouldn't be held up as the exemplar for pedestrian-oriented "Main Street" concepts that are being described in the text of this section.
19. LU-9.1- 9.11: Language in all of these policies needs to be strengthened and clarified so that regulatory planners and developers understand that practices, characteristics and design elements described here are enforced policies for development -- not just possible options they can take or leave.
20. LU-9.2: aren't village land use designations already assigned?
21. LU-9.3: (strengthen) Support the development, implementation and enforcement of Village-specific regulation for roads, parking and noise and design standards, and other planning Ensure that new development is compatible ...
22. LU-9.4: Prioritize infrastructure improvements and the provision of public facilities for Villages and community cores.
23. LU-9.7: (strengthen reference to design guidelines) Enforce design guidelines and standards to maintain the unique character of the community.
24. LU-9.9: (remove qualifiers and strengthen) Plan and support residential development that is compatible with the character of established neighborhoods
25. Semi-Rural/Rural Lands: Is there really NO difference between the Goals (and Policies) that guide development of Semi-Rural and Rural land use designations? It would seem that goals and policies for the development of 1, 2, 4 and even 10-acre parcels should be different from goals and policies for the development on parcels of 20-160 acres. Expectations, building practices and techniques -- it would seem that these would vary tremendously. At a minimum, Rural lands outside the CWA should have their own policies.
26. Commercial, Office and Industrial Development: The meaning of the first two paragraphs is vague.
27. LU-11.5: Allow large-format retail uses...compatible with surrounding areas and permitted by the Community Plan.
28. LU-11.8: Should include mix use, incompatible with policy LU-9.5.
29. LU-11.9: (add) Buffering techniques must be consistent with community design standards.
30. Goal LU-12: Adequate and sustainable infrastructure...
31. LU-12.1: Require infrastructure, facilities, and services needed by new development to be provided by that development, either directly and concurrently or through fees.
32. Goal LU -- and 14: Add policies for use of grey water systems.

DRAFT RESPONSES

18. Revised as suggested.
19. While DPLU has reviewed these policies and made some revision, it believes that the policies are definitive and clear policy statements.
20. Land use designation will be "assigned" with approval of the General Plan and are subject to possible change in the future.
21. Support is an appropriate term because development is not always undertaken by the County. Enforcement is also unnecessary as it relates to implementation.
22. Revised as suggested.
23. DPLU believes the current wording is appropriate. "Utilize" is relevant to the role of the design guidelines.
24. This policy was also written to address new neighborhoods. The suggested revisions have removed this and therefore were not made.
25. To date, stakeholders have not identified significant differences in goals and policies for these to Regional Categories.
26. These paragraphs serve to describe the relationship of nonresidential designations to the Community Development Model and their role in communities.
27. The wording of this policy has already been reviewed and refined by the Steering Committee.
28. DPLU believes the current wording is appropriate and is consistent with other policies.
29. Revision made.
30. Revision made.
31. This policy has been revised based on other comments.
32. A policy has been added to the Conservation/Open Space Element.

DRAFT RESPONSES

Chapter 5 – Conservation and Open Space Element

Why are these two elements combined when state law requires them as separate elements? Combining them minimizes the effectiveness for both of them.

1. Purpose and Scope:
 - a. Conservation of natural resources and preservation of open space should not be tied to the idea of “balancing development.” These are not co-dependent planning goals. We should be building AND conserving what we need. Clarify and strengthen the first sentence – ‘The purpose of the Conservation and Open Space Element is to achieve the following: ‘continue with the 3 bullets.
 - b. *Biological Resources* – Land-use based conservation goals and policies that protect ~~balance~~ the...and their associated habitats ~~with appropriate and necessary development~~.
 - c. *Pale ontological Resources* – Preserve the County’s rich geologic...land use based goals and policies that balance ~~conservation with appropriate and necessary development~~.
 - d. *Visual Resources* – Change to ‘Protect scenic corridors, ridgelines, and astronomical dark skies.’
 - e. *Park, Open Space and Recreational Facilities* – Change to ‘Ensure open space and park and recreational services to serve current and future residents.’
2. Guiding Principles for Conservation and Open Space: Need to add principle of funding for managing and maintenance of Open Space, parks and recreation and conservation easement resources once created to ensure the natural ones do not become hazards and the developed ones stay viable.
3. Relationship to Other General Plan Elements: Housing Element is missing. Different format than other elements.
4. Wildlife Corridors and Habitat Linkages: (revise first sentence) Wildlife corridors and linkages function only when habitat is sufficient to support wildlife movement.
5. COS-2.1: (strengthen) Require instead of encourage the restoration and enhancement of wildlife habitat, and reduce to the maximum extent possible the degradation of natural habitats in development located within all ~~semi-rural and rural~~ lands regional categories.
6. COS-5.6: New policy – Stop further densification in villages with known probability for contamination of ground water. If possible, distribute high density populated areas isolated by greenbelts. This may require the creation of new villages.
7. COS-12.1: Change to ‘Protect undeveloped ridgelines and steep hillsides.
8. Goal COS -21: Need to include usability for disabled beyond what ADA identifies.

Chapter 6 – Housing Element

1. Introduction: Why is the county only accommodating 80% of future growth within the CWA. Seems like this number should be higher.

State law does not require elements to be separate, rather it specifically allows for combining them. Due to the overlap of the content required for these two elements they have been combined.

Revisions have been made to this section similar to those suggested.

The section has been revised to include reference to long-term management.

Revised to include.

No change. This is not a correct statement as suggested.

Restoration is not a standard requirement and DPLU does not recommend changing current policy. Second part of policy revised.

It is unclear what this policy is referring to regarding groundwater contamination and it appears to be recommending leapfrog development and village expansion.

DPLU believes that the policy as currently written provide better direction for future decision making.

It is not clear what changes are recommended to COS-21. DPLU believe it is adequate as written.

This number is for the unincorporated County and represents a shift of 20% from the current General Plan.

2. Figure H-1: Moosa Creek Sewer treatment facility, Woods Valley treatment plant, and Skyline ranch treatment plant should be on this map for Valley Center.
3. Goals and Policies:
 - a. Goals and policies to maximize already-dense residential designations need sufficient references to other elements of the GP, or to Community Plans and Design Guidelines which can help rural Villages retain their identifying characteristics.
 - b. Density bonuses, modifications to regulations and other incentives are promoted here without requirements for parks, amenities and services to support residents of these communities. Valley Center's ballparks and recreational facilities are already inadequate to serve a semi-rural and rural population. Village developers must provide in their developments natural open spaces and recreational outlets that are sufficient to serve residents AND are also compatible in with community character and local plans for Village development.

Chapter 7 – Safety Element

1. S-1.1: our map is inconsistent with this policy.
2. S-1.7 New policy – In major subdivisions, prohibit shelter –in-place as a substitute for secondary access.
3. Fire Hazards – Context – Fuel Management and add as S-3.7: Require property owners to remove orchards and other agriculture that they no longer water and to re-vegetate the area with indigenous vegetation to avoid erosion.
4. Table S-1: Should this be response time rather than travel time?

DRAFT RESPONSES

This figure has been revised.

DPLU believe that sufficient references are provided within the General Plan to ensure this.

Parks and recreational facilities are addressed in the COS element, such as Policy COS-24.1. Village specific plans for recreational areas should be developed within community plans.

DPLU does not agree with this interpretation.

DPLU does not believe that inclusion of this policy in the General Plan is appropriate at this time.

DPLU believes the suggested policy to be too detailed for inclusion in the General Plan.

Travel time is the correct term as it can be consistently applied and measured throughout the County.

VCCPG Mobility Subcommittee (s/c)

Comments on GPU - Draft General Plan: Chapter 4, Mobility Element

Preamble: The VC Circulation (Mobility) Subcommittee wishes to commend the San Diego DPLU's GPU – Draft General Plan for its “environmentally sustainable approach to planning that balances the need for adequate infrastructure while maintaining and preserving agricultural areas and extensive open space within the county”. Worthy of special commendation is the plan to “maximize traffic movement and enhance connectivity by creating multiple connections between...different areas within communities”, for “addressing traffic congestion by reducing travel demand rather than increasing transportation capacity”, and for “reducing the need to widen or build new roads through the effective use of the existing transportation network...”.

We support the county's “commitment to facilitate efficient development near infrastructure and services, while respecting sensitive natural resources and protection of existing community character in its rural and semi-rural communities”, and to its commitment “to respect Community Plans that are reflective of the unique character” of communities such as Valley Center.

In support of these broad goals, we request the following general and specific revisions to the Draft:

The mobility element, overall, needs to be context sensitive. The subcommittee recommends specific rural road standards for the unincorporated communities of the back country; urban standards are not appropriate in many situations. The General Plan, DPLU and DPW need to recognize Community Plans as legal entities that must be adhered to for this same reason. The traffic studies and capacity alone should not determine road design. The roads should be built contextually even if this means lower speeds and greater set backs of houses. The General Plan Mobility Element needs to look forward to the twenty first century by allowing and encouraging new technologies and designs.

Page 4.3: Guiding Principals for Mobility:

Para. 2: The s/c commends the plan to “maximize traffic movement and enhance connectivity by creating multiple connections between...different areas within communities”. Add to end of para. 2: “The goals of the Mobility Element must be consistent with each unique Community Plan”.

Para. 4: The s/c also commends the plan to “minimize the need to widen existing roads by maximizing the performance of the existing network and the use of alternative modes of travel”.

Page 4-5: County Road System:

para. 2: Add underlined to last sentence: “Functional road classifications are correlated to the regional categories identified in the Land Use Element and to individual Community Plans”.

Page 4-6: County Road Operations and Network

Para. 3: Should be included in Community Plans

Page 4-6: Road Classifications:

Para. 2: Add: “All roads shall also adhere to the Community Plan. If the County plan is different than the Community Plan, the Community Plan shall be the controlling plan”.

Add: “Rural road standards shall be developed and included in Road Classifications”.

Page 4-8: Table M-1B: Road Classifications: Two-Lane Roads

Light Collector Series: Add section on Rural Road Standards

Page 4-11: Road Network

Para. 3: Right-of-way and roads provided by development: Add: “Proposed development will be in accordance with the Community Plan”.

The group's support is noted and appreciated.

These comments are noted.

The reference to consistency with community plans has been added to the bottom of page 4-3.

This is not an accurate statement as suggested. The road classifications are broadly applied across the County.

DPLU anticipates including road networks in Community Plans once they are under a standardized format.

The suggested addition is not appropriate because it infers that inconsistencies could exist between the plans.

A revision has been made to refer to context sensitive standards.

DPLU does not agree that this is an appropriate location to refer to standards.

The suggested addition is unnecessary. Sufficient emphasis on Community Plans is already provided in the General Plan.

DRAFT RESPONSES

Para. 5: Add: "Road design, operation, and maintenance that reflects community character and that is consistent with Community Plan".

Page 4-12: Goal M-2: Responding to Physical Constraints and preservation Goals: Add to end of Goal: "...and shall be consistent with the Community Plan"

Page 4-12: Policy M-2.4: Roadway noise buffers: Add: "Roadway noise buffers will be natural materials, such as low fieldstone walls with dense vegetation, not concrete walls". "Noise will be reduced through road design, slower design speeds, and building setbacks". Add: "Community will be involved in Roadway Noise Buffers decisions."

Page 4-13: Add new policy: M-2.6: The communities will be involved in the decision making process of planning and designing new roads, particularly inside the Villages

Page 4-13: Table M-3: Criteria for Accepting Level of Service E/F Roads:

Town Centers: added constraint: Community Plan

Regional Connectivity: added constraint: Community Plan

Page 4-14: Goal M-4: Add: "Rural Roads Compatible with Rural Character, and with Community Plan". Add to end of this para.: "This means smaller interconnected roads in the rural areas".

Page 4-17: Goal M-5: Policy M-5.1: Add to end of bullet #3: "...and be consistent with Community Plan".

Page 4-19: Goal M-6; Policy M-6.1: Add to end: "...consistent with the Community Plan".

Page 4-20: Public Transit, Context: Last para. On page: Add "The development patterns of the Land Use Map are intended to facilitate the use of public transportation in Village areas and shall be consistent with Community Plans".

Page 4-22: Transportation System Management:

The s/c commends the plan for "increasing efficiency, safety and capacity of existing transportation systems...with minimal roadway widening".

Page 4-22: Travel Demand Management:

The s/c commends the plan for "addressing traffic congestion by reducing travel demand rather than increasing transportation capacity".

Add: "The plan will include a provision to reduce density as a transportation demand management option. As densities are reduced, the Mobility Map and LOS studies must be reworked with community input".

Page 4-23: Goal M-9: Effective Use of Existing transportation Network.

Add underlined: "Reduce the need to widen or build new roads through the effective use of the existing transportation network...".

Page 4-24: Goal M-10: Parking for Community Needs: Add: "Parking regulations that serve community needs and enhance community character, and that are consistent with the Community Plan".

Page 4-25: Policy M-10.6: Add to end: "...consistent with the rural character and with the Community Plan".

Page 4-29: Goal M-12: Policy M-12.4: Land Dedication for Trails: Add to end: "Require development projects to plan, dedicate and construct trails that connect with the community's trails master plan".

Revision made as suggested.

The suggested addition is unnecessary. Sufficient emphasis on Community Plans is already provided in the General Plan.

The Noise Element addresses noise attenuation techniques. The second suggested revision has been incorporated. The third is not necessary.

This policy is not necessary as community involvement is inherent in any planning process.

Community character added as a bullet.

First suggested revision has been made. The second has not because of differing opinions among communities.

This revision is not necessary.

This revision is not necessary.

This revision is not necessary.

Noted.

DPLU does not agree with this concept. The County will commit to monitoring implementation of the General Plan and updating it as appropriate.

Revised as suggested.

This revision is not necessary.

Revised as suggested.

DPLU does not agree with this suggested which would be an expansion from the County's current trails policy.

Add: "The community will be provided a mechanism to add trails/pathways to large developments that are not currently shown on the Master Plan. There will be a process to require and plan additional trails".

Page 4-31: Roads Where a Lower Level of Service is Deemed Acceptable: This table should be in the Community Plan.

New East-West Road: This is road 3A and the section from Old Hwy. 395 to W. Lilac should be removed from plan and table.

DRAFT RESPONSES

This issue must be addressed at a Community Plan level.

DPLU anticipates including this table in Community Plans once they are under a standardized format.

As a result of Board-direction, this road is included in the draft General Plan and must be accepted with a lower LOS to be adopted by the Board. The Board also has the discretion to increase its classification or to remove the road from the road network. In either of these cases, the road will be removed from the table with adoption of the General Plan.

DRAFT RESPONSES

Two additional motions were approved by the Valley Center Planning Group at a special meeting held on January 20, 2009:

The first motion was:

In order for the VCCPG to support the current Draft General Plan Update, it is essential for the County to resume the planning process in conjunction with our Community Plan process so that Valley Center's Mobility, Land Use and Safety Elements, as well as all the other elements, are internally consistent and balanced.

The second motion was:

The Valley Center Community Planning Group requires adequate additional information from the county as part of the planning process. Until and unless this information is provided, the Planning Group can not make any individual road recommendation nor can the Planning Group endorse any recommendation made by the county in the Mobility Element of the draft General Plan Update.

DPLU appreciates this comment and is committed to working with the group as it revises its community plan.

DPLU believes that some of the information that the group is requesting will be contained in the General Plan Update Environmental Impact Report. At that time, the group can coordinate with DPLU if additional information is needed.