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Regarding: Project # LOG NO. 02-ZA-001; COUNTY OF SAN DIEGO GENERAL PLAN UPDATE (SCH #2002111067), for inclusion in definition of scope for project environmental impact statement. **Preferred environmental alternative fails to take into account existing homes and parcels, which would result in false information appearing in the EIR.**

The preferred environmental alternative map produced by staff has a major shortcoming that will skew the results of the environmental review and contribute to the failure of the county to achieve its stated goals as listed in the NOP and numerous other documents produced in the general plan update process.

The exclusion of existing density also does great financial harm to the owners of those homes, while serving no practical purpose in terms of supporting or promoting the public's interests – quite the opposite, in fact. The supposed preferred environmental alternative ignores the presence of hundreds of existing homes and businesses for the sake of an alleged environmental benefit that is purely fictional and exists only on paper.

My neighborhood serves as an excellent example. I have three homes on 16 acres. My immediate neighbor has two homes on approximately an acre. Three others have a home each on five acres. I and my neighbors expended considerable effort to get the real density that *already exists in our neighborhood* placed on the map, our chief concerns being our ability to rebuild if, for instance, a fire comes through. Secondly, we will never be able to separate those houses from each other by dividing the land they sit on into individual parcels – an act that would have no negative environmental affects whatsoever, since no additional homes would result from such division.

We are not talking about speculative values here. We are talking about homes that we have paid for, maintained, and paid taxes on for many years. Our local planning group agreed. The board of supervisors agreed. Our neighborhood was assigned a density of 1 DU/4 acres and has remained so on all subsequent maps until the unveiling of the preferred alternative map, which reduced the density to RL40 in complete denial of the reality on the ground.

Effectively, the EIR for the preferred alternative will look at this broad brush approach and assume impacts of one home for that entire area, when in fact, there are eight homes.

My neighborhood alone is certainly not enough to skew the environmental report, but there are hundreds of such properties scattered throughout the unincorporated area, not to mention hundreds more legal parcels that can all be built on, both before and after the update. All of these should have been taken into account *before* development densities were assigned to lands that have no homes on them.

This issue has been raised repeatedly over the 10 years that this process has been going on, yet staff has consistently failed to give any thought to the massive inaccuracies and inequities of the maps it has produced. What's more, the county has, at the same time, provided a huge window of opportunity for wealthy large landowners to embark on planning for huge high density developments on land that is virtually untouched.

Specifically, the EIR, as planned, will fail in the following goals the county has laid out in the NOP:

Goal 1. *Plan for projected and expected population growth in the region.* Since the map has failed to correctly define the locations of existing home and population densities, it cannot possibly define what density to place elsewhere in order to keep growth within appropriate numbers. Hence, the EIR cannot offer correct information about projected impacts.

Goal 3. *Limit greenhouse gas emissions from vehicles by locating future residences closer to employment and town centers.* Since staff has ignored many existing homes and legal parcels, it cannot possibly hope to correctly quantify their impacts in the project EIR. Final results will be skewed from reality and future emissions increased more than theoretical build-out numbers with the addition of "invisible" homes and parcels to the full build-out densities assigned to large properties that currently have no homes on them.

Furthermore, most of our rural communities are required only to comply with the state's basic smog check requirements. It is important for the EIR to quantify whether the cumulative impacts of growing NAFTA traffic and proposed build-out will impact our air quality to the extent that enhanced smog check requirements, such as are required in cities to the west, would be placed on local residents.

Goal 4. *Protect natural resources through the reduction of population capacity in sensitive areas.* Failure to acknowledge existing home and population densities and the assignment of those densities to such areas as Buckman Springs Road and Highway 94 near Cameron Corners in Campo encourages building on sensitive lands. This particular area is an important watershed and wetland area, collecting water from upstream in the watershed and sending a portion of it west and south where it recharges local wells and sustains other riparian areas and wildlife. To ignore this in favor of painting on density just because it is "proximate to existing infrastructure and services," is to ignore the potential for harm to a vital regional resource.

These resources *should have been quantified and protected before density was assigned* on the county's maps. The loss to groundwater and wetland resources cannot be mitigated. There is no water available to replace it. Picture the impacts to the property owners whose value was utterly destroyed by the Barona Casino and multiply it many times over. The Campo valley density was inappropriately placed and studies for the EIR should make this watershed a priority for special focus.

If the county is serious about producing a good and environmentally sound plan update, then its staff needs to stop treating the project like a grade school coloring project. There are real impacts to the environment and real impacts to people that are being ignored to produce a map that fits some artistic standard that has little to do with the realities on the ground. This map will not result in a plan or an EIR that is legally defensible.

These comments were submitted to DPLU by e-mail on May 24, 2008. Sincerely



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