

**LIST OF PERSONS, ORGANIZATIONS, AND PUBLIC AGENCIES
 THAT COMMENTED ON THE NOTICE OF PREPARATION OF
 AN ENVIRONMENTAL IMPACT REPORT
 FOR THE COUNTY OF SAN DIEGO GENERAL PLAN UPDATE 2020
 LOG NO. 02-ZA-001**

Public Review Period: November 14, 2002 through December 16, 2002

The following is a listing of the names and addresses of persons, organizations, and public agencies that commented during this public review period.

	NAME	ADDRESS
	FEDERAL AGENCIES:	
1	Marine Corps Base Camp Pendleton*	Larry D. Rannals RannalsLD@pendleton.usmc.mil
2	U.S. Dept. of Agriculture, Forest Service, Cleveland National Forest	Anne S. Fege, Ph.D Forest Supervisor 10845 Rancho Bernardo Drive, Suite 200 San Diego, CA 92127-2107
	STATE AGENCIES	
3	California Integrated Waste Management Board, Permitting and Enforcement Division*	Raymond M. Seamans PO Box 4025 Sacramento, CA 95812-4025
4	State of California, Dept. of Fish and Game*	William E. Tippets Environmental Program Manager South Coast Region 4949 Viewridge Avenue San Diego, CA 92123
5	State of California, Dept. of Toxic Substances Control	Haissam Y. Salloum, P.E. Unit Chief, Southern California Cleanup Operations Branch, Cypress Office 5796 Corporate Avenue Cypress, CA 90630
6	State of California, Dept. of Transportation	Bill Figge Chief, Development Review and Public Transportation Branch District 11 2829 Juan Street P.O. Box 85406 San Diego, CA 92186-5406

* Comment was received after 4:00 p.m., December 16th, 2002

	COUNTY, CITY, AND OTHER LOCAL AGENCIES	
7	Cajon Valley Union School District*	Christina Becker Director, Long-Range Planning 189 Roanoke Road, Box 1007 El Cajon, CA 92022-1007
8	City of Carlsbad	Michael J. Holzmilller Planning Director 1635 Faraday Avenue Carlsbad, CA 92008-7314
9	City of Chula Vista	Marilyn R.F. Pongeggi Environmental Review Coordinator 276 Fourth Avenue Chula Vista, CA 91910
10	City of Chula Vista, Community Development Department*	Benjamin Guerrero, Environmental Projects Manager 276 Fourth Avenue Chula Vista, CA 91910
71	City of Escondido Planning Department*	Charles D. Grimm, Director of Planning and Building 201 North Broadway Escondido, CA 92025
11	City of Poway	Jim Lyon Senior Planner P.O. Box 789 Poway, CA 92074-0789
12	City of San Diego, Water Department, Water Operations Division	Arlene Dea Deeley Dams, Reservoirs and Watershed Engineering 2797 Caminito Chollas San Diego, CA 92105-5097
13	City of San Marcos	Jerry Backoff Planning Division Director 1 Civic Center Drive San Marcos, CA 92069-2918
14	Grossmont Union High School District	Thomas Silva Director of Facilities Planning P.O. Box 1043 La Mesa, CA 91944-1043
72	San Diego County Water Authority*	Paul Gebert pgebort@sdcwa.org

* Comment was received after 4:00 p.m., December 16th, 2002

15	University of California Natural Reserve System*	Isabelle Kay Reserves Manager Natural Reserve System 9500 Gilman Drive La Jolla, CA 92093-0116
16	Vista Fire Protection District	Richard Hemenez President 175 N. Melrose Drive Vista, CA 92083
	PLANNING GROUPS	
17	Borrego Springs Community Sponsor Group*	Duane Bright PO Box 1371 Borrego Springs, CA 92004
18	Del Dios/Mt. Israel Town Council	Stacy McCline Chairman of Board 20155 Elm St. Escondido, CA 92029
19	Descanso Planning Group	John Elliot Chair P.O. Box 38 Descanso, CA 91916
20	Elfin Forest/Harmony Grove Town Council	Mid Hoppenrath Member, Board of Directors 20223 Elfin Forest Road Elfin Firest, CA 92029
21	Palomar Mountain Planning Organization	Bruce Graves Chairman P.O. Box 145 Palomar Mountain, CA 92060-0145
22	Ramona Community Planning Group	Sam Mitchell Chair P.O. Box 803 Ramona, CA 92065
23	Spring Valley Community Planning Group	John Ferguson Chairman P.O. Box 1637 Spring Valley, CA 91979-1637
	ORGANIZATIONS	
24	Building Industry Association of San Diego County	James Whalen Alliance for Habitat Conservation Matthew Adams

* Comment was received after 4:00 p.m., December 16th, 2002

List of Persons, Organizations, & Public Agencies
that Commented on the Notice of Preparation of
an Environmental Impact Report
for The County of San Diego General Plan Update 2020
Log No. 02-ZA-001

- 4 -

		Building Industry Association, et al. 6336 Greenwich Drive, Suite A San Diego, CA 92122-5994
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** Comment was received after 4:00 p.m., December 16th, 2002*

ORGANIZATIONS (cont.)		
25	Center on Policy Initiatives	Murtaza Baxamusa 3727 Camino Del Rio South, Suite 100 San Diego, CA 92108
26	Desert Protective Council, Inc.*	Janet Anderson PO Box 3635 San Diego, CA 92163-1635
27	Farm Bureau, San Diego County*	Eric Larson Executive Director 1670 East Valley Parkway Escondido, CA 92027-2409
28	Mountain Defense League	Pandora Rose Director 434 Creeman Lane Ramona, CA 92068
29	Save Our Aquifer Coalition	Dennis W. Dickinson President P.O. Box 1397 Borrego Springs, CA 92004
30	Sierra Club, San Diego Chapter*	Eric Bowlby Sierra Club, San Diego Chapter Representative for the GP2020 Interest Group 3820 Ray Street San Diego, CA 92104-3623
INDIVIDUALS		
31	George Barnett	2194 Paseo Donito Alpine, CA 91901
32	Crest View Properties	Paul Urich Manager P.O. Box 23344 San Diego, CA 92193
33	Winfield & Marjorie Dean	2369 Nido Aguila Alpine, CA 91901-3615
34	Dino De Luca*	1225 East Vista Way Vista, CA 92084
35	Janet L. Denny	2255 Sequest Trail Escondido, CA 92029

* Comment was received after 4:00 p.m., December 16th, 2002

	Individuals (cont.)	
36	Carolyn Dorroh	17235 Voorhes Lane Ramona, CA 92065
37	Donald A. Dreessen, DVM*	719 South We-Go Trail Mt. Prospect, IL 60056
38	George Eastwood	2451 Southern Oak Road Ramona, CA 92065
39	Ruth Epstein-Beck	13454 Hilldale Road Valley Center, CA 92082
40	Finnamex Corp	Aarre Silvola Horticulturalist 2910 Rainbow Glen Road Fallbrook, CA 92028
41	Gerald Fisher	23550 Hwy 76 Santa Ysabel, CA 92070
42	Jane Carmichael Fitz	2564 Via Dieguenos Alpine, CA 91901
43	Janet Gilbert	20061 Sunset Oaks Drive Ramona, CA 92065
44	Larry Glavinic*	P.O. Box 2088 Valley Center, CA 92082
45	Thomas A. Graves	9373 Hazard Way, Suite 101 San Diego, CA 92123-1226
46	Susan and Brian Greenberg*	2068 Balentine Drive Alpine, CA 91901
47	Theodore Griswold*	530 B Street, Suite 2100 San Diego, CA 92101-4469
48	Mildred and Aaron Hock	P.O. Box 1048 Borrego Springs, CA 92004
49	John P. Kennedy	2180 Paseo Donito Alpine, CA 91901
50	Kathleen McCarthy	10100 Santa Monica Blvd. Los Angeles, CA 90067
51	Timothy and Beth McCarthy	macbeth2@cox.net
52	Betty Moss	37596 Tierra Estrella Boulevard, CA 91905
53	David Nilson	P.O. Box 460401 Escondido, CA 92046-0401
54	Vivian Osborn	17279 Voorhes Lane Ramona, CA 92065

* Comment was received after 4:00 p.m., December 16th, 2002

Individuals (cont.)		
55	Gary Piro and Thure Stedt	No address
56	Joseph Preski and Dennis Gonya	16887 Skyline Truck Trail Jamul, CA 91935
57	John Rarick	749A Portola Street SF, CA 94123-1127
58	Paul Rohal	2172 John Dewitt Place Alpine, CA 91901
59	Judith Silverman	mmsilver28@aol.com
60	Jean Slosek	20 Plaza Viejas Alpine, CA 91901
61	Dr. A Starkey	P.O. Box 594 Pine Valley, CA 91962
62	John Stewart	19742 Lake Drive Escondido, CA 92029
63	Ken and Avis Stewart	2504 Camino Avena Alpine, CA 91901
64	Judge Targia*	No address
65	Alan Thum	1392 Peachwood Drive Encinitas, CA 92024
66	Susan M. Trager	19712 MacArthur Blvd., Suite 120 Irvine, CA 92612
67	Sandra Vanek	vane@nethere.com
68	Clyde Wahl	3622 Reidnick Drive Jamul, CA 91935-2701
69	William and Joan Waterworth	3005 Venadite Alpine, CA 91901
70	Kenneth A. Wood	16909 Via de Santa Fe, Suite 203 P.O. Box 2609 Rancho Santa Fe, CA 92067

* Comment was received after 4:00 p.m., December 16th, 2002

Giffen, Jason H

From: Jones, Megan
Sent: Friday, February 07, 2003 5:11 PM
To: Giffen, Jason H
Subject: FW: Comments Re: NOP for EIR on SD County General Plan Update 2020

-----Original Message-----

From: Rannals GS14 Larry D [mailto:RannalsLD@pendleton.usmc.mil]
Sent: Friday, February 07, 2003 4:32 PM
To: Jones, Megan
Cc: Quigley GS12 Ken W; Farmer Col Lee H
Subject: Comments Re: NOP for EIR on SD County General Plan Update 2020

Ms. Jones:

Listed below are three comments submitted from Marine Corps Base (MCB), Camp Pendleton with respect to the County's Notice of Preparation (NOP) for an Environmental Impact Report (EIR) to be prepared in support of the San Diego County General Plan Update 2020 effort.

These comments are submitted in response to an undated County of San Diego letter received at this Command on January 17th (along with a copy of the subject NOP), and seeking comments from any Department of Defense installations in San Diego County regarding the subject matter issue. While the NOP comment deadline was given as no later than 1600 on 8 February, no specific point of contact was provided as to where such comments should be forwarded (other than to the County Planning Department).

I've elected to forward these comments to your office based on County website information at www.resource-sandiego.org indicating you are associated with land use issues. In the event this is the incorrect point of contact for submission of such comments, would you please forward our comments to the appropriate individual or section that should receive them. Thank you in advance for this assistance.

We are pleased to submit the following comments from MCB, Camp Pendleton, with recommendations for several minor changes to be incorporated into the Notice of Preparation Documentation dated November 14, 2002, Env. Review Number: LOG NO. 02-ZA-001:

1. On page 5 add to Biological Resources paragraph to evaluate impacts in terms of 5) potential adverse effects to existing and proposed areas of open spaces being managed under plans other than habitat conservation plans e.g. National Forest lands, tribal lands, military installations.
2. On page 5, in the Land Use and Planning Issue paragraph reword the last sentence to read, "Moreover, the EIR will identify potential land use conflicts resulting from the juxtaposition of proposed land use designations including potential impacts to military installations and mission activities."
3. On page 9 in the Long Term Environmental Effects paragraph change the last sentence to read, "The EIR will assess potential impacts that the General Plan buildout could have on surrounding communities *including military installations and operations.*"

Should you have any questions regarding any of these above recommended changes, please contact Mr. Ken Quigley in our Environmental Security Department at (760) 725-9733.

2/10/2003

Thank you,
Larry Rannals
Community Plans & Liaison Officer
Marine Corps Base, Camp Pendleton
By direction of the Commanding General



United States
Department of
Agriculture

Forest
Service

Cleveland National
Forest

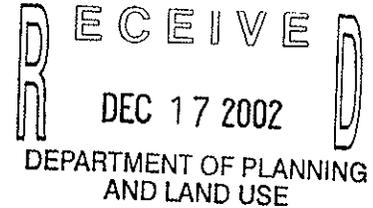
10845 Rancho Bernardo Dr
Suite 200
San Diego, CA 92127-2107
(858) 673-6180
(858) 673-6192 FAX
CRS 1-800 735-2922

File Code: 1900

Date: December 16, 2002

Mr. Gary Prior, Director
Department of Planning and Land Use
5201 Ruffin Road, Suite B
San Diego, CA 92123

* faxed on
12/16/02
@ 11:24 am
AM



Comments on Notice of Preparation Documentation for County of San Diego General Plan Update 2020, Log No. 02-ZA-001

Dear Mr. Prior:

Thank you for the opportunity to comment on the this action relating to the San Diego County General Plan Update 2020, as outlined in your September 20 memorandum to the County of San Diego Planning Commission. We appreciate the opportunity to comment on this document, and find that it includes most of the concerns and impacts that could affect the Cleveland National Forest in the future.

We ask that you consider the following additional issues:

- Agriculture: Impacts of conservation easements or purchase of development rights
- Hazards: Requirements to be placed on future development to reduce the risk of wildland fire to homes and communities adjacent to undeveloped areas
- Hydrology: Effects of wildland fire on hydrologic processes and flooding
- Hydrology: Effects of cumulative groundwater withdrawals (from homes, developments, and commercial water sales) on local streamflows and riparian habitats
- Minerals: Projected removal of sand and gravel to construct new homes, and those environmental impacts
- Recreation: Effects of population trends on recreation opportunities and experiences on state and federal lands; interface of trail systems from county to other public and private lands
- Utilities: Impacts from increasing demands for and provision of easements for powerlines, utility rights-of-way, cellular and fiber optics lines, radio and television broadcast sites, and other urban infrastructure services
- Cumulative Impacts: Effects of development that reduce habitats of sensitive and endangered species, which then reduce availability of public and private lands for recreation and other uses.

Please contact Bernice Bigelow (858-674-2919) or me, for further information.

Sincerely,
ANNE S. FEGE, Ph.D.
Forest Supervisor





California Integrated Waste Management Board

Linda Moulton-Patterson, Chair
1001 I Street • Sacramento, California 95814 • (916) 341-6000
Mailing Address: P. O. Box 4025, Sacramento, CA 95812-4025
www.ciwmb.ca.gov

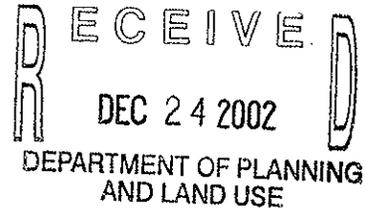


Gray Davis
Governor

Winston H. Hickox
Secretary for
Environmental
Protection

December 18, 2002

Gary L Pryor, Director
Department of Planning and Land Use
County of San Diego
5201 Ruffin Road, Suite B
San Diego, CA 92123-1666



Subject: SCH No. 2002111067 Notice of Preparation of a Draft Environmental Impact Report for the County of San Diego General Plan Update 2020

Dear Mr. Pryor:

Thank you for the opportunity to review and comment on the Notice of Preparation for the Draft Environmental Impact Report entitled County of San Diego General Plan Update 2020. The California Integrated Waste Management Board's (Board) would be a commenting agency. At this time, we have no comments on the proposed environmental document.

If the Solid Waste element of the General Plan is changed or amended, Board staff request copies of any subsequent environmental documents, including the Draft Environmental Impact Report and the Final Environmental Impact Report.

If you have any questions, please contact me at 916.341.6728 or email me at rseamans@ciwmb.ca.gov.

Sincerely

Raymond M. Seamans
Permitting and Inspection Branch
Environmental Review
Permitting and Enforcement Division
California Integrated Waste Management Board

California Environmental Protection Agency

Printed on Recycled Paper

DEPARTMENT OF FISH AND GAME

South Coast Region
949 Viewridge Avenue
San Diego, California 92123
(858) 467-4201
(858) 467-4235 FAX



December 16, 2002

Mr. Jason Giffen
San Diego County Department of Planning and Land Use
5201 Ruffin Road, Suite B
San Diego, California 92123-1666

**Comments on the Notice of Preparation of a Draft Environmental Impact Report
for the Proposed General Plan Update 2020 (SCH# 2002111067)**

Dear Mr. Giffen:

The Department of Fish and Game (Department) appreciates this opportunity to comment on the above-referenced notice of preparation (NOP), relative to impacts to biological resources. The Department is a Trustee Agency with jurisdiction over natural resources affected by the proposed project (Section 15386 of the California Environmental Quality Act, CEQA), and a Responsible Agency under CEQA Section 15381 over those aspects of the proposed project that come under the purview of the California Endangered Species Act (Fish and Game Code Section 2050 et seq., CESA) and Fish and Game Code Section 1600 et seq. The Department also administers the Natural Community Conservation Planning Program (NCCP) as both a Trustee and Responsible Agency.

The proposed project is a comprehensive update of the San Diego County (County) General Plan. The updated General Plan would direct population growth balanced with infrastructure needs, development, and resource protection to the year 2020. More specifically, the proposed project would focus population capacity in the western portions of the County and reduce the potential for growth in the eastern areas. The objectives of this general population distribution are to: 1) facilitate efficient, orderly growth by containing development within areas proximate to existing infrastructure and services; 2) protect natural resources through the reduction of population capacity in sensitive areas; and 3) retain the character of communities within the unincorporated County. The draft Environmental Impact Report (DEIR) will focus on the secondary effects that can be expected to follow from adoption of the Comprehensive General Plan Update and will not be so detailed as an EIR on the specific construction projects that will follow.

The Department supports the project's intent to focus population capacity in the western portions of the County and reduce the potential for growth in the eastern areas. We offer the following comments and recommendations to assist the County in avoiding or minimizing potential impacts to the sensitive biological resources within and to the east of the existing and

Mr. Jason Giffen
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proposed preservation areas of the Multiple Species Conservation Program (MSCP) Subarea Plans for the south and north County, respectively.

The NOP indicates that the DEIR for the proposed project will not be so detailed as an EIR on the specific construction projects that will follow. The Department recommends that the County prepare a Program EIR pursuant to Section 15168(a)(3) of the CEQA Guidelines. Program EIRs provide an occasion for more exhaustive consideration of effects and alternatives than would be practical in an EIR on an individual action (Section 15168(b)[1] of the CEQA Guidelines), and ensure consideration of cumulative impacts that might be slighted in a case-by-case analysis (Section 15168(b)[2] of the CEQA Guidelines). In addition, we recommend that the DEIR provide a level of detail sufficient to completely compare and contrast the potential biological impacts of the proposed project and all alternatives.

To enable the Department to adequately review and comment on the proposed project from the standpoint of the protection of plants, fish, wildlife, and sensitive habitats, we recommend the following information be included in the DEIR:

1. A complete discussion of the purpose and need for the proposed project.
2. A complete description of the proposed project and all project alternatives. This should include:
 - a. narrative, tables, and figures that clearly describe/depict the following for the proposed project and each project alternative (i.e., separate, but easily comparable, figures for the proposed project and each alternative): (i) the habitat types within the project area, (ii) the relative footprints of the various proposed land uses on the biological resources, and (iii) the projected distribution of the human population;
 - b. the text of any amendments or updates to existing ordinances (e.g., Resource Protection Ordinance), policies, or Specific Plans, etc., proposed to be components of the project;
 - c. a clear description of the methodology used to (a) replace the residential lot size requirements with the density-based approach, and (b) rezone to maintain consistency with the updated General Plan;
 - d. a thorough discussion of any modifications proposed to the Regional Trail Network;
 - e. a thorough discussion of how the proposed project and each alternative analyzed would focus population capacity in the western portions of the County and reduce the potential for growth in the eastern areas, and would meet the stated objectives of the project. This should include the specific mechanisms the County would use to restrict growth in the western portions of the County.

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The descriptions and analyses of the alternatives should ensure that alternatives to the proposed project are fully considered and evaluated. The analyses must include alternatives that avoid or otherwise reduce impacts to sensitive biological resources.¹ Because of the magnitude of the acreage involved and the many sensitive species and habitats that could be negatively affected or lost by the proposed project, the CEQA alternatives analysis for this project is extremely important. The Department is particularly interested in the DEIR describing "a range of reasonable alternatives to the project... which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives" [Section 15126.6 (a) of the CEQA Guidelines (emphases added)]. "The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making" (Section 15126.6 [f] of the CEQA Guidelines).

3. An identification of State or federally listed rare, threatened, endangered, or proposed candidate species, California Species-of-Special Concern and/or State Protected or Fully Protected species, and any locally unique species and sensitive habitats within the project's area of potential effect.
4. A complete discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources. This should include:
 - a. Discussions regarding the regional setting, pursuant to the CEQA Guidelines, Section 15125(a), with special emphasis on resources that are rare or unique to the region that would be affected by the project. This should include comprehensive and geographically specific information on both terrestrial and aquatic (including groundwater) resources that are within the area of potential effect.² This discussion is critical to an assessment of environmental impacts.
 - b. Discussions regarding the anticipated impacts on sensitive species and habitats.
 - c. Discussions regarding potential indirect project impacts on biological resources, including resources on nearby public lands, open space, adjacent natural habitats, riparian and other aquatic ecosystems³, and any designated and/or proposed NCCP reserve lands (e.g., impacts on, and maintenance of, wildlife corridor/movement areas,

1 One of the basic purposes of CEQA is to "prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible" (CEQA Guidelines, Section 15002 (a)(3); emphasis added).

2 The information on the aquatic resources should be based on watersheds.

3 The Department has responsibility for the conservation of wetland and riparian habitats. It is the policy of the Department to discourage development in or conversion of wetlands. All wetlands and watercourses, whether intermittent or perennial, should be retained and provided with substantial setbacks which preserve the riparian and aquatic values and maintain their value to on-site and off-site wildlife populations.

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including access to undisturbed habitats in adjacent areas⁴).

The NOP states that the DEIR would analyze "whether the project will: 1) substantially alter existing drainage patterns in a manner which would result in substantial erosion, siltation or flooding on- or off-site." The DEIR should define "substantially," and the definition should recognize that even small changes in drainage patterns can seriously degrade habitats. At about 10 to 25% imperviousness, the health of aquatic systems is severely degraded (May et al. 1997; Schueler 1994).

- d. An analysis of cumulative effects, as described under CEQA Guidelines, Section 15130.
 - e. An analysis of the effect that the project or any alternative may have on completion and implementation of regional and/or subregional conservation programs. Under Section 2800 through Section 2840 of the Fish and Game Code, the Department, through the NCCP program, is coordinating with local jurisdictions, landowners, and the Federal Government to preserve local and regional biological diversity. Coastal sage scrub is the first natural community to be planned for under the NCCP program. The Department recommends that the County ensure that the development of this and other proposed projects do not preclude long-term preserve planning options and that projects conform with other requirements of the NCCP program.
5. Mitigation policies and a set of objective criteria for meeting these policies. The DEIR should propose guidelines for mitigation measures to facilitate processing of discretionary projects within areas of the project footprint that are outside established habitat conservation plans.

Unless future projects are within areas covered by a habitat conservation plan, a CESA Permit (Section 2081 of the Fish and Game Code) or, if applicable, a Consistency Determination (Section 2080.1 of the Fish and Game Code), must be obtained if the project has the potential to result in "take" of species of plants or animals listed under CESA, either during construction or over the life of the project. CESA Permits are issued to conserve, protect, enhance, and restore State-listed threatened or endangered species and their habitats. Early consultation is encouraged, as significant modification to a project and mitigation measures may be required to obtain a CESA Permit.⁵

-
- 4 If necessary to ascertain the potential impacts on wildlife movement and to assist in determining appropriate measures to eliminate or minimize these impacts, the County should conduct a wildlife movement study(ies). The Department requests the opportunity to review the scope of work intended for any such study the County plans to conduct. If no such study is done, the DEIR should demonstrate that the information used for the impact analysis is adequate.
 - 5 Revisions to the Fish and Game Code, effective January 1998, may require that the Department issue a separate CEQA document for the issuance of a 2081 permit unless the project CEQA document addresses all project impacts to listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of a 2081 permit. For these reasons, the:
 - a. biological mitigation monitoring and reporting proposals should be of sufficient detail and

Mr. Jason Giffen
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Unless future projects are covered by a master streambed alteration agreement, they may require a Lake or Streambed Alteration Agreement (SAA). The Department has direct authority under Fish and Game Code Section 1600 *et. seq.* regarding any proposed activity that would divert, obstruct, or affect the natural flow or change the bed, channel, or bank of any river, stream, or lake. The Department's issuance of a SAA for a project that is subject to CEQA requires CEQA compliance actions by the Department as a Responsible Agency.

The Department appreciates the opportunity to comment on this NOP. Please contact Libby Lucas of the Department at (858) 467-4230 if you have any questions or comments concerning this letter.

Sincerely,



For William E. Tippetts
Environmental Program Manager

Literature Cited

May, C.R., R. Horner, J. Karr, B. Mar, and E. Welsh. 1997. Effects of Urbanization on Small Streams in the Puget Sound Lowland Ecoregion. In: Watershed Protection Techniques, 2(4): 483-494.

Schueler, T. 1994. The Importance of Imperviousness. In: Watershed Protection Techniques, 1(3): 100-111.

requirements of a 2081 permit. For these reasons, the:

- a. biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for a CESA Permit, and
- b. a Department-approved Mitigation Agreement and Mitigation Plan are required for plants listed as rare under the Native Plant Protection Act.



Department of Toxic Substances Control

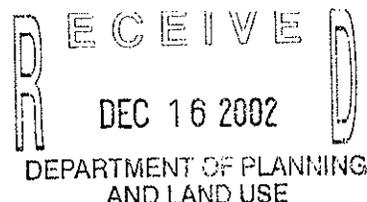


Edwin F. Lowry, Director
5796 Corporate Avenue
Cypress, California 90630

Winston H. Hickox
Agency Secretary
California Environmental
Protection Agency

Gray Davis
Governor

December 11, 2002



Mr. Jason Giffen
San Diego County Department of Planning and Land Use
5201 Ruffin Road, Suite B
San Diego, California 92123-1666

NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR
THE COUNTY OF SAN DIEGO GENERAL PLAN UPDATE 2020, LOG NO. 02-ZA-001
- (SCH # 2002111067)

Dear Mr. Giffen:

The Department of Toxic Substances Control (DTSC) has received your Notice of Preparation (NOP) of a draft Environmental Impact Report (EIR) for the above-mentioned Project.

Based on the review of the document, DTSC's comments are as follows:

- 1) The draft EIR needs to identify and determine whether current or historic uses have resulted in any release of hazardous wastes/substances at the site.
- 2) The draft EIR needs to identify any known or potentially contaminated sites within the proposed Project area. For all identified sites, the draft EIR needs to evaluate whether conditions at the site pose a threat to human health or the environment.
- 3) The draft EIR should identify the mechanism to initiate any required investigation and/or remediation for any site that may require remediation and the government agency to provide appropriate regulatory oversight.
- 4) An environmental assessment should be conducted in the project area to evaluate whether the project area is contaminated with hazardous substances from the potential past and current uses including storage, transport, generation, and disposal of toxic and hazardous waste/materials. Potential hazard to the public or the environment through routine transportation, use, disposal or release of hazardous materials should be discussed in the draft EIR.

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our Web-site at www.dtsc.ca.gov.

- 5) The project construction may require soil excavation and soil filling in certain areas. Appropriate sampling is required prior to disposal of the excavated soil. If the soil is contaminated, properly dispose of it rather than placing it in another location. Land Disposal Restrictions (LDRs) may be applicable to these soils. Also, if the project is planning to import soil to backfill the areas excavated, proper sampling should be conducted to make sure that the imported soil is free of contamination.
- 6) Any hazardous wastes/materials encountered during construction should be remediated in accordance with local, state, and federal regulations. Prior to initiating any construction activities, an environmental assessment should be conducted to determine if a release of hazardous wastes/substances exists at the site. If so, further studies should be carried out to delineate the nature and extent of the contamination. Also, it is necessary to estimate the potential threat to public health and/or the environment posed by the site. It may be necessary to determine if an expedited response action is required to reduce existing or potential threats to public health or the environment. If no immediate threat exists, the final remedy should be implemented in compliance with state regulations and policies rather than excavation of soil prior to any assessments.
- 7) A potential hazardous impact to the public may be associated with future uses of the site, potential uses and storage of hazardous materials at the site should be addressed in the draft EIR. A hazardous material storage permit may be required from an appropriate regulatory agency that has jurisdiction to regulate hazardous substances handling, storage, treatment and/or disposal. Contact the Certified Unified Program Agency (CUPA) to evaluate the permit requirements.
- 8) The NOP does not indicate whether or not there are any schools or daycares in the vicinity of the project area. Human health and the environment of students and faculty members should be protected during the construction or demolition activities. A study of the site should be conducted to provide basic information for determining if there are, have been, or will be, any threatening releases of hazardous materials that may pose a risk to human health or the environment.
- 9) The NOP indicates that the project site may be located on a list of hazardous materials sites compiled pursuant to Government Code Section 659662.5, and as a result, might create a potential hazard to the public or the environment. The proposed development may fall under the "Border Zone of a Contaminated Property" which is defined to be within a distance of 2000 feet of the property. Appropriate precautions should be taken prior to construction if the proposed project is on a "Border Zone Property."

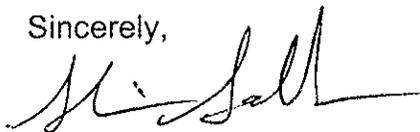
Mr. Jason Giffen
December 11, 2002
Page 3

- 10) The NOP states that the project is adjacent to an airport which would result in a potential impact and safety hazard for people residing or working in the project area. Identify whether any threats of hazardous substances release currently exists from this airport. Also, proper investigations should be conducted to confirm that the airport has not contributed any chemical contamination to the proposed developmental areas.
- 11) If during construction of the project, soil and/or groundwater contamination is suspected, suspend construction in the area and implement appropriate Health and Safety procedures. If it is determined that contaminated soil and/or groundwater exist, the draft EIR should identify how any required investigation and/or remediation will be conducted and which government agency will provide appropriate regulatory oversight.

DTSC provides guidance for Preliminary Endangerment Assessment (PEA) preparation and cleanup oversight through the Voluntary Cleanup Program (VCP). For additional information on the VCP, please visit DTSC's web site at www.dtsc.ca.gov.

If you have any questions regarding this letter, please contact Ms. Rania A. Zabaneh, Project Manager at (714) 484-5479.

Sincerely,



Haissam Y. Salloum, P.E.
Unit Chief
Southern California Cleanup Operations Branch
Cypress Office

cc: Governor's Office of Planning and Research
State Clearinghouse
P.O. Box 3044
Sacramento, California 95812-3044

Mr. Guenther W. Moskat, Chief
Planning and Environmental Analysis Section
CEQA Tracking Center
Department of Toxic Substances Control
P.O. Box 806
Sacramento, California 95812-0806

DEPARTMENT OF TRANSPORTATION

DISTRICT 11
BOX 85406, MS 50
SAN DIEGO, CA 92186-5406
PHONE (619) 688-6954
FAX (619) 688-4299



*Flex your power!
Be energy efficient!*

December 13, 2002

Mr. Jason Giffen
San Diego County Dept. of Planning & Land Use
5201 Ruffin Rd., Suite 'B'
San Diego, CA 92123-1666

RE: NOP for a Draft EIR – San Diego County General Plan Update 2020 (Log No. 02-ZA-001)
(SCH # 2002111067)

Dear Mr. Giffen:

The Department of Transportation (Department) appreciates the opportunity to review and comment on the Notice of Preparation (NOP) for a Draft Environmental Impact Report (EIR) for the County of San Diego's General Plan Update 2020. The Department has the following comments:

Advanced Planning comments:

- On the "Document Details Report." Proximity section, Highways I-8, I-805, I-905, along with SR-11, SR-54, SR-125, and SR-188 should all be referenced as in proximity to the County General Plan area.
- On the "Notice of Completion and Environmental Document Transmittal Form," the Highways identified in the comment above should be included, along with SR-52 and SR-56 which are also within two miles of the County General Plan Area.
- In the "Notice of Preparation Document" dated November 14, 2002, the last paragraph of the Project Location section should include the highways referenced in the comments above.
- We would like to direct the County to our Transportation Concept Reports (TCRs) for each of the State Highways and to work with Department staff in developing the Circulation Element of the County General Plan to provide consistency between the highway and county road systems.
- The identified shift in overall population and land use density may affect the highway system and overall highway level of service. This potential change should be carefully evaluated and appropriate mitigation identified. We would like to review the Circulation Element and the associated map changes as this is being studied in preparation of the EIR.

If there are any questions on the Advanced Planning comments, please contact Chris Thomas at (619) 688-5384 or Robert Hoglen at (619) 220-5384.

Mr. Jason Giffen
December 13, 2002
Page Two

Traffic Operations Comments:

- In the *Project Location* section, page 2, last paragraph, the east / west State Routes 52, 54, and 905 as well as the north / south State Routes 75 and 125 are not mentioned. These Routes are located mostly in incorporated areas but are in the unincorporated County as well. Also, please note that 163 is a State Route rather than an Interstate.
- In the *Environmental Issues, Transportation and Traffic* section, page 8, last word of the first paragraph, consider adding bicycle **facilities** instead of or in addition to bicycle racks.

If there are any questions on the Traffic Operations comments, please contact Brian Hadley, Freeway Operations, at (619) 718-7854.

Community Planning Comments:

- The Department recognizes that there is a strong link between transportation and land use. Growth and development can have a significant impact on traffic and congestion on State transportation facilities. In particular, the pattern of land use can affect both total vehicle miles traveled and the number of trips per household. The challenge is to improve mobility while at the same time enhancing quality of life. The Department encourages the County of San Diego to work towards a jobs-housing balance at the community level which can enable residents to live and work in the same area, potentially decreasing demand on inter-regional transportation facilities. The Department also encourages the County to incorporate mixed use and residential densities which will support transit and other modes.
- The Department encourages the County to provide a safe, functional, interconnected, multi-modal circulation system integrated with "smart growth" type land use planning. A convenient, efficient, and attractive multi-modal transportation system in which pedestrians, bicycles, and transit vehicles are accommodated in addition to automobiles can help to increase mobility and reduce traffic and congestion on State transportation facilities. Improved transit accommodation through the provision of park and ride facilities, signal prioritization, or other enhancements can also improve mobility.
- The Department encourages the County to continue its Trail System Assessment working towards a safe, continuous, and interconnected Regional Trails Network. Within the context of good community design and "smart growth" principles, an interconnected trail network can help to increase mobility and reduce traffic and congestion on local roads and State transportation facilities by providing functional alternatives to the automobile. In addition, trails can have a positive effect on residents' "quality of life" by providing convenient and safe recreational opportunities. The most important factors limiting the greater use of trails are safety considerations and a lack of continuity. The Department publishes design standards for multi-

Mr. Jason Giffen
December 13, 2002
Page Three

purpose trails in Section 1003.5 of the State Highway Design Manual. Due to topography and ecological considerations, bike paths, greenways, trails, and other passive recreational uses such as linear parks are an appropriate fit along local rivers, creeks and canyons, provided they are constructed and maintained in an environmentally conscientious manner. The existing County trails system is an excellent first step towards improved mobility in the area, and its enhancement will encourage increased non-motorized travel and commuting in the area. Continuity and connectivity are important considerations which may necessitate coordination with adjoining jurisdictions

- The Department encourages the County of San Diego to incorporate the following Goals and Policies developed by the County GP2020 Interest Group Committee last spring and summer:

Circulation Goal. A multi-modal circulation system that provides for the safe, accessible, convenient, and efficient movement of people and goods.

Circulation Policy B. Establish land use and transportation network patterns that will help reduce single-occupant automobile trips, encourage the use of public transit and alternative modes of travel, and pedestrian-oriented development.

Circulation Policy F. Support and encourage the use of public transit and car/van pools to reduce roadway congestion, conserve energy, and reduce pollution.

Circulation Policy H. Provide safe and attractive accommodation for all users of the roadway, including transit riders, bicyclists, and pedestrians.

Circulation Policy (new). Establish a County trails system separate from roadways to accommodate pedestrians, bicycles, and pedestrians.

Land Use Goal I-K. Site higher density and intensity uses in areas with adequate public transportation.

Land Use Goal I-H. Development should be directed towards existing communities.

Land Use Goal II-B. Development should occur only in areas where the provision of necessary public facilities and services is feasible and appropriate.

Land Use Goal IV-G. Promote housing and employment centers in proximity to one another.

Land Use Goal V-A. Commercial development shall be internally and externally convenient and accessible by various modes of transportation.

Mr. Jason Giffen
December 13, 2002
Page Four

- The Department encourages and welcomes close coordination with lead agencies on new development including General Plans and environmental documents. We anticipate continued coordination through the Interest Group Committee and/or other forums, as needed and appropriate. If you have any questions about the Community Planning comments, please contact Brent McDonald, Development Review Branch, at (619) 688-6819.

The Department looks forward to reviewing the draft EIR for the County of San Diego's General Plan Update 2020.

Sincerely,



BILL FIGGE, Chief
Development Review and Public Transportation Branch

cc: BFrank	OPR State Clearinghouse	
BMcDonald	Caltrans Planning	MS-50
AShahmiri	Caltrans Planning	MS-50
RHoglen	Caltrans Adv. Planning	MS-38
BHadley	Caltrans Traffic Ops	MS-55



Long-Range Planning

Christina Becker

189 Roanoke Road, Box 1007
El Cajon, CA 92022-1007

(619) 588-3016
FAX (619) 441-7898

December 16, 2002

County of San Diego
Dept. of Planning and Land Use
5201 Ruffin Rd., Suite B
San Diego, CA 92123-1666

Re: NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT
County of San Diego General Plan Update 2020, Log No. 02-ZA-001
Comment/Response Date: 12-16-02

In response to the Notice of Preparation, the Cajon Valley Union School District (CVUSD) would like to take this opportunity to provide the County of San Diego information regarding its current student enrollment and status of facilities to meet the anticipated demand of future growth and population.

CVUSD is currently serving over 19,000 kindergarten through eighth grade students in San Diego's East County and is experiencing severe overcrowding. The District is made up of 21 elementary schools and 5 middle schools with over 250 portable classrooms to house its overflow students. These overcrowded conditions also create the need for additional bussing of students to schools outside their resident school area.

In March 2000, the District received State eligibility/approval for new construction for its current 2,170+ unhoused students, however, this does not provide housing for students from new residential development. Please refer to the School Facilities Need Analysis provided to Gary Pryor, County of San Diego, on July 17, 2002.

It is the District's request that the County of San Diego take the District's current and future facility needs into consideration when updating the General Plan and preparing the Environmental Impact Report.

Sincerely,

Christina Becker
Director, Long-Range Planning



City of Carlsbad

Planning Department

December 5, 2002

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

**SUBJECT: COMMENTS ON THE NOTICE OF PREPARATION OF AN ENVIRONMENTAL
IMPACT REPORT FOR THE COUNTY OF SAN DIEGO GENERAL PLAN
UPDATE 2020**

This letter is in response to the Notice of Preparation (NOP) of an Environmental Impact Report (EIR) for the County of San Diego General Plan Update 2020 received by the City of Carlsbad on November 14, 2002.

City of Carlsbad Planning Department staff has reviewed the NOP and did not identify any major areas of concern at this time. We concur with the environmental issues identified to be examined in the EIR for the County's General Plan update.

In particular, the City is interested in the analysis pertaining to potential revisions to the County's Land Use and Housing Elements, and what impacts those revisions may have on regional housing share allocations in other local jurisdictions. In addition, the City is also interested in the EIR analysis pertaining to potential revisions to the County's Circulation Element, and what impact those amendments may have to transportation facilities within the City of Carlsbad.

Thank you for the opportunity to review and comment on the Notice of Preparation for the County's General Plan Update EIR. At this time we would like to request that any information regarding the County's General Plan update and EIR be forwarded to us for review as it becomes available.

Please forward any additional information regarding the project to the attention of Jennifer Coon, Associate Planner in the Planning Department at 1635 Faraday Avenue, Carlsbad, CA 92008. In addition, please forward any information regarding the County's Circulation Element to the attention of Bob Johnson, Traffic Engineer in the Engineering Department Traffic Division at the same address.

Sincerely,

MICHAEL J. HOLZMILLER
Planning Director

MJH:JC:mh

c: Jennifer Coon
Bob Johnson
Data Entry





CITY OF
CHULA VISTA

PLANNING AND BUILDING DEPARTMENT

December 16, 2002

Mr. Gary Pryor, Director
Department of Planning and Land Use
County of San Diego
5201 Ruffin Road, Suite B
San Diego, CA 92123-1666

Subject: Notice of Preparation of an Environmental Impact Report for the County of
San Diego General Plan Update 2020, Log No. 02-ZA-001

Dear Mr. Pryor:

The City of Chula Vista offers the following comments on the Notice of Preparation of a
Program EIR (NOP) for the County of San Diego General Plan Update 2020:

With regard to the South Bay area, County staff should coordinate with City staff to
obtain the most current land use and public infrastructure information to incorporate into
technical studies prepared in support of the Program EIR. The City has worked
extensively with SANDAG over the last few years to comprehensively update land use
databases used for transportation and other modeling. Since we are also preparing
various technical studies for our General Plan update, it is important that our plans rely
on consistent information.

Throughout the discussion of environmental issues that will be examined in the Program
EIR, a specific reference to "future population" is consistently made where potential
impacts to people are identified. Please ensure that potential impacts to the existing
population within both the unincorporated and incorporated areas will be adequately
addressed as well.

In light of the fact that most incorporated cities within the County do not accommodate
solid and hazardous waste disposal within their jurisdictions, the Program EIR should
identify all solid and hazardous waste disposal facilities, both within and outside of the
County, which serve the County's population and industry and should assess the long-
term ability of these facilities to meet projected demand.

Mr. Gary Pryor
December 16, 2002
Page 2

The City of Chula Vista appreciates the opportunity to comment on this NOP and looks forward to reviewing the draft Program EIR. Please contact Paul Hellman, Environmental Projects Manager, at (619) 585-5680, to obtain needed information with respect to the City of Chula Vista.

Sincerely,



Marilyn R.F. Pongeggi
Environmental Review Coordinator

cc: Robert Leiter, Director of Planning and Building
Ed Batchelder, General Plan Project Manager
Duane Bazzel, Principal Planner
Dave Kaplan, Traffic Engineer

December 16, 2002

RECEIVED
DEC 18 2002
DEPARTMENT OF PLANNING
AND LAND USE

To Whom It May Concern:

You recently received a copy of a Notice of Preparation of a Draft Environmental Impact Report from the Chula Vista Redevelopment Agency for a proposed amendment and merger of the Chula Vista Redevelopment Plan.

Please note the following two changes: 1) the Agency proposes to add approximately 522 acres of generally noncontiguous commercially and industrial areas in west Chula Vista into the Merged Project Area, not 400 acres as stated on page 1; and 2) the proposed Redevelopment Plan Amendment and Merger also would re-establish the Agency's authority to use eminent domain on nonresidential property in the Town Centre II and Otay Valley constituent project areas.

Please keep these changes in mind during your review of the Notice of Preparation. If you have questions please call:

Mr. Benjamin Guerrero
Environmental Projects Manager
City of Chula Vista
Community Development Department
276 Fourth Avenue
Chula Vista, CA 91911
(619) 476-5311

*Received late but to be included
in comments*

RECEIVED
JUN 04 2003
DEPARTMENT OF PLANNING
AND LAND USE

Charles D. Grimm
Director of Planning and Building
Planning Division
(760) 839-4671, FAX (760) 839-4313



CITY OF
ESCONDIDO
201 NORTH BROADWAY
ESCONDIDO, CA 92025

June 3, 2003

Gary L. Pryor
Department of Planning and Land Use
5201 Ruffin Road, Suite B
San Diego, CA 92123-2960

SUBJECT: County of San Diego General Plan Update 2020 (Log No. 02-ZA-001) – Response to Notice of Preparation of an Environmental Impact Report

Dear Gary:

This letter responds to the Notice of Preparation (NOP) of an Environmental Impact Report (EIR) for the County's General Plan 2020 Update. We are submitting comments at this time, as we had no record of receiving the NOP during the comment period that ended December 16, 2002 (obviously, the problem could have been at our end as well). Although the NOP time period has ended we did talk to a County project planner and he indicated there was still time to submit comments on the NOP which are included below. The majority of issues relate to the changes proposed in the Harmony Grove area but there are comments regarding other issues as well.

The Harmony Grove area proposes a substantial density increase, specifically a Village Residential concept with densities up to 10.9 dwelling units (du) per acre. This area is within the City of Escondido's General Plan and Sphere of Influence boundaries, and is designated as Rural I and Rural II, which allows low-density residential development with a maximum one unit per two acres and one unit per four acres respectively. We assume the EIR land use section will analyze differences between the City's General Plan Land Use Element and the County's proposed land use plan.

With respect to the Harmony Grove area, we request that the EIR assess sewer, public services and traffic impacts necessary to accommodate the land use change. Although they need not be addressed at a project level of detail, the

Lori Holt Pfeiler, Mayor
Marie Waldron, Mayor Pro Tem
Tom D'Agosta
Ed Gallo
Ron Newman

increased density and clustered project type can clearly affect the extent and nature of improvements and anticipated demand for public services.

The extension of City sewer service to the unincorporated area is uncertain since it would be a major departure from existing City Council policy. In light of this, the EIR should include an alternative based on a County sewage disposal system. The alternative utilizing City of Escondido sewer facilities should assess impacts to the City's Hale Avenue Resource Recovery Facility (HARRF), analyze needed offsite improvements, and consider impacts on remaining treatment and disposal capacity.

The City's Fire Service Master Plan includes all areas within Escondido's Sphere of Influence and anticipates serving the Harmony Grove area upon annexation based on low-density development. The increased density in Harmony Grove under the County's proposed 2020 General Plan Update represents a significant departure from the City's planned densities for the area. The Escondido Fire Chief has indicated a concern that the City's mutual aid responsibilities may be compromised given the urban level densities proposed for Harmony Grove. The EIR should evaluate what measures are required to insure that City fire services and improvements are not impacted by the proposed land use change. The EIR should also assess the existing (and proposed) fire protection needs for the proposed density increase in Harmony Grove to ensure adequacy.

Numerous circulation issues currently exist in the area as documented in the recently certified EIR for the Escondido Research and Technology Center (ERTC). The industrial designation for the ERTC property had been in effect since 1986. We request that the project's impacts be assessed using the generally accepted SANTEC methodology, which requires proportionate share contributions when projects generate more than 2% of the capacity of intersections or segments that area currently operating below mid LOS "D". More extensive mitigation must be provided for project impacts that reduce levels of service. Please note that we have developed cost estimates for needed improvements in the area and would be happy to share them with you.

We understand the existing County Circulation Element includes the planned construction of SC 1375 as a Collector Road, connecting Del Dios Highway with the Harmony Grove area. The City's Circulation Element does not include this connection. In light of the numerous issues associated with the southern extension of SC 1375, its status should be clarified for the project analysis.

If the County decides to construct SC 1375 the City of Escondido has a number of concerns regarding the additional traffic being added to Del Dios Highway, Via Rancho Parkway and additional traffic added to major Escondido streets

proceeding east and north from the project. If the County ultimately decides not to construct SC 1375 our concerns would be lessened somewhat for Del Dios and Via Rancho Parkway but would be compounded for the routes proceeding east and north and for freeway interchanges along I-15 and Highway 78.

Each of the existing eastern and northern routes referenced above, as well as any proposed new routes, presents its' own set of issues. The EIR should also consider constraints to the widening of Harmony Grove Road as it parallels Escondido Creek, the narrow existing bridge on Harmony Grove Road, and the uncertain timing of the Citracado Parkway extension.

We further understand that the County intends to phase the acquisition of the 345-acre property (formerly Derbas property) purchased by The Escondido Creek Conservancy (TECC) for open space purposes, and that the planned alignment for SC 1375 crosses this property. The EIR should address two alternatives, including the planned alignment of SC 1375 per the existing Circulation Element and the potential deletion of this connection if the entire property is intended to remain as open space. Further, given the proposed density increases in the Harmony Grove area, the EIR should evaluate how traffic from the Harmony Grove area will be accommodated along with any necessary Circulation Element widening, including improvements within the City of Escondido.

The EIR should identify potential conflicts with the Multiple Habitat Conservation Program (MHCP) that was adopted by the SANDAG Board in March 2003. The EIR should also address conflicts with the proposed policies within the City of Escondido's Draft Subarea Plan implementing the MHCP. The EIR should evaluate any potential impacts to wildlife corridors and habitat connections between the City of Escondido's Focused Planning Area and County lands, specifically in the vicinity of Daley Ranch and the City-owned lands along Valley Center Road and Lake Wohlford.

The Jesmond Dene area proposes Office Professional uses in the vicinity of Deer Springs Road. Since this area is also within the City' General Plan and Sphere of Influence boundary, the EIR land use section should analyze differences between the City's Estate I designation (up to one unit per acre) and the County's proposed designation.

Daley Ranch is a 3,058-acre open space and habitat conservation area at the northeast corner of the City. The EIR should evaluate potential edge effects to Daley Ranch resulting from anticipated development of abutting County properties, and identify appropriate mitigation measures to provide an adequate buffer to protect biological resources at Daley Ranch.

Gary Prior
June 3, 2003
Page 4

Potential impacts to biological resources resulting from anticipated infrastructure improvements and associated mitigation measures should be identified in the EIR. Specific areas of concern to be evaluated include Escondido Creek as it may be affected by any widening of Harmony Grove Road to accommodate density increases in the Harmony Grove area, and impacts to sensitive plant and animal species necessitated by construction of SC 1375.

We appreciate the opportunity to comment on the NOP and look forward to receiving a copy of the Draft EIR addressing the above-listed concerns. Please feel free to call either myself at (760) 839-4541, or Barbara Redlitz, Principal Planner, at (760) 839-4546, if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to be 'C. Grimm', with a long horizontal line extending to the right.

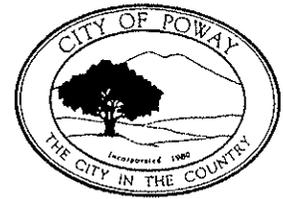
Charles D. Grimm
Director of Planning and Building

cc: Jeffery Epp, City Attorney
Mike Adams, Assistant City Manager
Patrick Thomas, Public Works Director
Jonathan Brindle, Assistant Planning Director
Barbara Redlitz, Principal Planner
Jay Petrek, Senior Planner

CITY OF POWAY

MICKEY CAFAGNA, Mayor
BOB EMERY, Deputy Mayor
JAY GOLDBY, Councilmember
DON HIGGINSON, Councilmember
BETTY REXFORD, Councilmember

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DEPARTMENT OF PLANNING
AND LAND USE



December 13, 2002

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

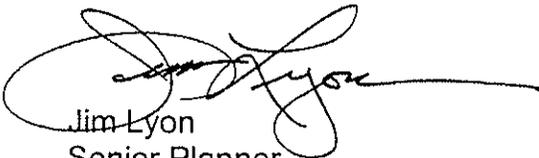
Subject: County of San Diego General Plan Update 2020, Log No. 02-ZA-01

Dear Mr. Pryor,

The Transportation and Traffic Section of the Environmental Initial Study located within the Notice of Preparation speaks to various forms of proposed traffic improvements such as reducing trips, improving levels of service, changing traffic patterns, and reducing dangerous conditions. The implementation of these improvements will require a significant funding source.

The County of San Diego currently does not collect traffic mitigation fees for smaller developments. These small but cumulatively significant developments, particularly in the rural areas, do not pay their local contribution for road and intersection improvements. The impacts of these developments are often felt through the intervening jurisdictions all the way to the closet freeway. As part of the General Plan Update, the EIR should consider the development of a traffic mitigation schedule and implementation plan that would help address the suggested General Plan improvements and contribute to the County's interjurisdictional and intrajurisdictional transportation responsibilities.

Sincerely,
Development Services Department


Jim Lyon
Senior Planner

M:\planning\letter02\County GP Update EIR.doc

City Hall Located at 13325 Civic Center Drive
Mailing Address: P.O. Box 789, Poway, California 92074-0789 • (858) 748-6600, 695-1400
FAX 748-1455

**CITY OF SAN DIEGO
WATER DEPARTMENT
WATER OPERATIONS DIVISION**

2797 Caminito Chollas, San Diego, CA 92105-5097
Phone (619) 527-8066 Fax (619) 527-7412

FAX COVER SHEET

Date: *December 13, 2002*

To:

Organization: *County of San Diego DPLU*

Phone/Fax: *unknown/(858) 694-3373*

Re: *General Plan 2020 update; Notice of Preparation for EIR*

From: *Arlene Dea Deeley
Dams, Reservoirs and Watershed Engineering*

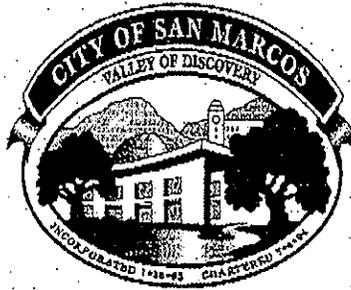
YOU SHOULD RECEIVE 2 PAGE(S), INCLUDING THIS COVER SHEET. IF YOU DO NOT RECEIVE ALL THE PAGES,
PLEASE PHONE

The following draft comments are in City routing approval process. Your review and comments are appreciated. Also, please provide specific contact person info.

1. On pages 6 & 7 for Hydrology and Water Quality and Land Use Planning sections, provide project location on local standard GIS mapping to surface and ground water sources.
2. Identify coordination with contact persons of applicable cities and counties for implementing mandated requirements of EPA NPDES Phase II Co-permittee stormwater permit.
3. Consider identifying project with local and regional source water protection buffers, areas and/or zones per California Department of Health Services Source Water Protection Assessment Program or other updated regulation (coordinate and refer to county Project Clean Water internet site) of the responsible city, county and other government agencies.

cc: Jesus Meda, Bob Collins

acd/h:t



1 Civic Center Drive
San Marcos, CA 92069-2918

Telephone
(760) 744-1050

December 16, 2002

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

Subject: Response to the NOP for the General Plan Update 2020 EIR, LOG No. 02-ZA-001

In response to the Notice of Preparation for the above referenced project, the City of San Marcos Development Services Department, Planning Division, submits the following comments:

1. At the time of the NOP preparation, the specifics of the General Plan, including a detailed land use distribution map, element revisions, County/Subregional Plans and necessary Ordinance revisions were still being developed, and a preferred project had not been selected by the Board of Supervisors. Therefore, the City of San Marcos requests that these documents be made available for an adequate public review comment period prior to releasing the Draft Environmental Impact Report (EIR) preparation.
2. The NOP states that the EIR will evaluate changes in land use distribution anticipated and potential impacts to any adopted Habitat Conservation Plan. The City requests that the EIR further evaluate the potential impact of land use changes to the draft North County Multiple Species Conservation Plan, which is out for public review, but not yet adopted by SANDAG or the responsible agencies. It is important to ensure connectivity of biological sensitive habitat lands.
3. In the area of population and housing, the EIR should make clear where the population growth density shifts will occur as a result of the proposed land use changes in the GP 2020 Plan, and to what extent this change may have on regional housing needs.
4. The traffic section of the NOP states that the EIR "will identify existing and proposed buildout traffic conditions on road segments and intersections with unacceptable levels of service." The EIR should evaluate General Plan land use changes on all anticipated traffic impacts on all impacted roadway segments and intersections, including cumulative impacts. At the County scoping meeting, staff stated that the SANDAG traffic analysis methodology would be used. The City requests a written confirmation of this fact, as well as, the scope of the traffic analysis to be prepared as part of the EIR.

The EIR should also evaluate the impact of the GP 2020 plan on major circulation routes that affect nearby jurisdictions, such as Las Posas Road. It is the City's understanding that the County has received requests from residents that this segment of Las Posas Road, which is in the County, but within our Sphere of Influence, be deleted from the County Circulation Element. In considering this, please evaluate the traffic that will be served by Las Posas Road, if diverted, that would impact Twin Oaks Valley Road, thereby creating additional noise and traffic impacts on existing residents as well as potentially causing an over capacity (deficiency) on the roadway near San Marcos Boulevard and State Route 78.

Additionally, at least two roadways in the County Circulation Element (Mulberry Drive and La Cienega Road) are in conflict with the City of San Marcos Circulation Element and Land Use Plan. The County circulation plan should include consideration of the City's circulation and land use plans and consultation with City staff.

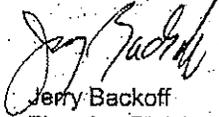
CITY COUNCIL:

F.H. "Corky" Smith, Mayor Pia Harris-Ebert, Vice-Mayor Hal Martin Jim McAuley Mike Preston

5. In the area of public services, the General Plan 2020 EIR should evaluate the regional impact of land use changes on the local public service agencies, including fire and police protection. As the County does not have a fire protection district to service all of the unincorporated areas, the impact to local fire protection service agencies should be appropriately evaluated, including impacts to response times caused by traffic increases and/or changes in circulation patterns.
6. The City of San Marcos request clarification as to what will be included in the analysis referred to as the "Regional Trails Network" in the NOP. The City wants to be assured that the EIR will any potential project impact to the City of San Marcos Trail Plan in the context of a regional plan.
7. The City requests that the EIR analyze the General Plan 2020 changes in relation to the objectives under Tentative Order No. 2001-01 by the Regional Water Quality Control Board, the San Diego region.

Due to the lack of General Plan 2020 documents to review at this time, the City of San Marcos reserves the right to provide further comments once the detailed land use map, and all other General Plan 2020 documents are prepared. If you have any further questions, please contact Susan Vandrew at (760) 744-1050, x.3237.

Sincerely,



Jerry Backoff
Planning Division Director

cc: City Manager
Assistant City Manager
Development Services Director
City Engineer

Ivan



High School District

COMMITTED TO EXCELLENCE
S I N C E 1 9 2 0

• GOVERNING BOARD MEMBERS

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• SUPERINTENDENT

GRANGER B. WARD

December 3, 2002

Mr. Gary L. Pryor, Director
County of San Diego
Department of Planning and Land Use
5201 Ruffin Road, Suite B
San Diego, CA 92123-1666

Regarding: Response to Notice of Preparation
County of San Diego General Plan Update 2020
Log Number 02-ZA-001

Dear Mr. Pryor:

Please accept this correspondence as the Grossmont Union High School District's response to the Notice of Preparation for the General Plan Update 2020. The District provides education programs to high school students in grades nine through twelve. It also administers the Adult Education and the Regional Occupation Programs. Grossmont is the largest high school district in the state. The 2002/03 school year enrollment is 24,447 day school students, 35,000 adult school students and 6,000 adults in the R.O.P. program.

The District has 11 comprehensive high schools, one continuation high school and three special education schools. The following communities are served by the District:

Incorporated Cities

El Cajon Lemon Grove
La Mesa Santee

Unincorporated Communities

Alpine Lakeside
Casa De Oro Mount Helix
Crest Rancho San Diego
Dehesa Spring Valley
Jamul/Dulzura

The District's Long Range Facilities Master Plan, approved in April 2001, shows a need for one new high school that will serve the Alpine and Blossom Valley communities. It also demonstrates a reconstruction need of 307 million dollars at all high schools.

The appropriate size of a new school site depends on the type of school proposed to be constructed, the expected enrollment and the grade levels served. The State of California uses the 2000 Edition of the "Guide to School Site Analysis and Development" when evaluating proposed school sites.

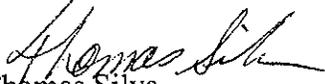
The District would like to construct a 2,000 student high school (grades 9-12) that will address the needs of Alpine and Blossom Valley. Such a school would require 50 net usable acres, compatibility with adjacent uses and access to major thoroughfares. The General Plan currently has a schools component in the Public Facilities Element. I recommend that the section remain in the General Plan Update 2020 but be amended to add the GUHSD programs and needs. It should also identify the following factors the State Department of Education requires of school districts when evaluating prospective new school sites:

- Proximity to airports
- Safety
- Location
- Environment
- Soils
- Site, Size and Shape
- Accessibility
- Availability of Public Services
- Utilities
- Topography

It would be ideal if the Land Use Element of the General Plan could identify these parameters and some potential candidate sites in its schematic land use plan.

A scheduling conflict makes it impossible for me to attend the December 5, 2002 scoping meeting, but I would like to be involved as the District's representative in future planning meetings.

Sincerely,



Thomas Silva

Director of Facilities Planning
Grossmont Union High School District
(619) 644-8176
(619) 465-7168 (fax)

cc: Tom Robinson, SDCOE

Giffen, Jason H

From: Gebert, Paul [pgeb@sdca.org]
Sent: Thursday, May 29, 2003 7:05 AM
To: Giffen, Jason H
Subject: RE: GP2020 NOP

Jason,
I guess the first piece of legislation is:
AB 1015, as amended, Laird. Land use: water supply.
(1) Existing law requires a city or county general plan to include a specified land use element, requires the city or county to use a water agency's water management plan as a source document upon the adoption or revision of its general plan on or after January 1, 1996, and requires specified public water systems to provide certain information to the city or county planning agency upon notification of the proposed adoption or amendment of a general plan.

Also any issues with SB221 and 610?

Paul

-----Original Message-----

From: Giffen, Jason H [mailto:Jason.Giffen@sdcounty.ca.gov]
Sent: Wednesday, May 28, 2003 4:47 PM
To: 'Gebert, Paul'
Subject: RE: GP2020 NOP

Dear Paul,

I would be happy to answer your question, however, I need for you to further elaborate "up coming legislation" for me. Would you please provide me some detail as the specific legislation you are referring to enable me to respond more directly to your question.

Thank you for your inquiry.

Sincerely,

Jason H. Giffen, EMS III
Department of Planning Land Use
Resource Planning Division
5201 Ruffin Road, Suite B
San Diego, CA 92123-1666
(858) 694-3720, FAX (858) 694-3373
jason.giffen@sdcounty.ca.gov

-----Original Message-----

From: Gebert, Paul [mailto:pgeb@sdca.org]
Sent: Wednesday, May 28, 2003 3:32 PM
To: Giffen, Jason H
Subject: RE: GP2020 NOP

Jason,
I did not find a copy of the NOP in my file and I would still like a copy. My real question may be: How will the county's EIR address water supply in light of up coming state legislation?

-----Original Message-----

From: Giffen, Jason H [mailto:Jason.Giffen@sdcounty.ca.gov]
Sent: Monday, May 19, 2003 8:50 AM

To: 'pgeb@sdca.org'
Subject: GP2020 NOP

Dear Paul,

I will forward you a copy of the GP2020 Notice of Preparation today.

Sincerely,

Jason H. Giffen, EMS III
Department of Planning Land Use
Resource Planning Division
5201 Ruffin Road, Suite B
San Diego, CA 92123-1666
(858) 694-3720, FAX (858) 694-3373
jason.giffen@sdcounty.ca.gov

3163 A Evening Way
La Jolla, CA 92037

December 16, 2002

Department of Planning and Land Use
5201 Ruffin Road, Suite B
San Diego, California 92123
Fax: (858) 694-3373

Re: County of San Diego General Plan Update 2020, Notice of Preparation (of an Environmental Impact Report), Env. Review No. 02-ZA-001

The following comments are submitted by Isabelle Kay, San Diego Reserves Manager for the University of California Natural Reserve System, which manages the Dawson-Los Monos Canyon Reserve in north coastal San Diego County. It is very close to County lands adjacent to Palomar-McClellan Airport, and these lands constitute a significant portion of the habitat core and linkage in the area.

The following are comments on the EIR NOP as distributed on November 14, 2002:

Aesthetics: It is not clear whether impacts to scenic vistas from anywhere other than along designated "Scenic Highways" will be evaluated. Clearly, scenic vistas from generally-accessible vantage points, destination scenic sites and trails, and scenic landforms, whether or not they constitute a "vista" should be considered worth protecting. An overall land-form protection measure should be considered, especially one that protects ridgelines throughout this plan's jurisdiction.

Agriculture: Impacts to agricultural lands should also be considered in the light of the impacts to watershed functions, including overall impermeable surface, water quality, water quantity, hydrology, etc.

Biological Resources: This section needs to go much further towards examining not just impacts on resources teetering on the brink of annihilation, i.e. threatened and endangered species and "sensitive" habitats, but more broadly needs to look at impacts to ecosystem functioning and services provided by the landscape, on a watershed-wide, or broader level. Impacts of this plan on the adequate functioning of reserves established to protect species and habitats under the NCCP process (i.e. the MSCP, the north county MHCP, the north county inland MHCP, etc.), and critical habitat designated for threatened and endangered species need to be detailed. Perhaps this is the intention of the phrase "The EIR will evaluate impacts in terms of:...4) conflicts with the provisions of any adopted HCP, NCCP, or other approved local, regional, or state HCP, policies, or ordinances." However, all too often, a boilerplate declaration that the project is "in conformance with" the provisions is made, without a serious analysis of the actual implementation of those plans. For instance, the implementation of planning for the unincorporated areas might only indirectly impact adjacent areas, but those impacts could

be significant. Finally, the impacts of the plan on the ability to maintain fire as an ecosystem function in open space areas should be discussed.

Cultural Resources: This section should go further, and analyze the extent to which ALL cultural resources will be impacted; too often, artifacts dispersed over a large area are individually deemed insignificant, while the knowledge gained from the sites as a whole may be very important. There should also be an analysis of how sites could be left intact rather than having the artifacts removed to museums, thus destroying their context for future generations.

Geology and Soils: Attention should be given to the phenomenon of erodible soils, and the impacts to downslope areas resulting when construction occurs; even if the construction site itself is compacted or otherwise modified to render it "safe" for building, too often the runoff from such areas produces massive erosion downslope and downstream, resulting in detrimental impacts to streams and lagoons. A discussion of the preservation of permeable soils for the purposes of watershed protection should also be included. Additionally, this section should describe the locations of, and impacts to, unique or particularly interesting landforms and soils (e.g. type localities such as Mount Woodsen for granodiorite, high concentrations of iron-oxide concretions in Linda Vista sandstone, etc.) and a discuss a plan to preserve them.

Hazards and Hazardous materials: The impacts of additional vehicle emissions are not specifically called out, and should be: Vehicle emissions are the single largest pollutant of surface and ground waters in many watersheds. Also, the additional number of human deaths due to the increased numbers of motor vehicles should be examined in light of different options for transportation.

Hydrology and Water Quality: In this section the analyses should be done on a watershed scale, i.e. impacts should not just be extrapolated to the region, but should address impacts to surface and ground water quality and beneficial uses on a watershed level as the highest level of organization, and preferably on a sub-basin scale. In this section, an analysis of the percent permeable surface should be estimated for each watershed sub-basin, and the effects that will result from changes in impervious cover resulting from the plan.

Utilities and Service Systems: Included in this section should be an analysis of upland and riparian systems as integral to the stormwater system, including the functions of absorption, conveyance, and cleansing, and an analysis of the cost of degrading or destroying existing open space as measured through increased costs of water treatment and habitat restoration. There are several communities where it has been found to be economically more conservative to not develop certain watersheds above a certain density, in order to maintain ecosystem services intact. Please contact me if you would like references on this subject.

Cumulative Impacts: It is hoped that this section will receive the very great attention it requires. The analysis needs to take into account the following:

1) the synergistic effects of combined impacts to the ecosystem, such as increased air pollution and climate change; or population growth and reduced water availability.

2) the effects of projected climate change overall, including long-term drought (e.g. runoff will then largely be due to non-natural sources.)

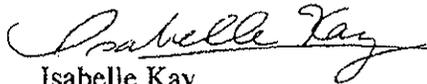
3) watershed-based analyses; i.e. the impacts should be expressed on a watershed-by-watershed basis.

4) overall effects on human health, including stress levels, and exposures to toxins.

Alternatives: A third type of alternative should be discussed: land-use planning on a watershed-basis, i.e. establishing a new framework for analyzing the long-term effects of human development on the landscape, and for planning infrastructure, housing, education, and commerce so that desired thresholds for each watershed are not exceeded. This could make for a much more efficient, logical, and effective way of achieving sustainable co-existence of humans and the local ecosystem in the region, thereby allowing for a much higher quality of life long-term for San Diego county residents than is currently projected.

Thank you for the opportunity to give input. Please keep me apprised of the progress of this project.

Sincerely,



Isabelle Kay

Reserves Manager, UCSD Natural Reserve System



RECEIVED
DEC 16 2002
DEPARTMENT OF PLANNING
AND LAND USE

JASON G

VISTA
FIRE PROTECTION
DISTRICT

December 11, 2002

County of San Diego
Department of Planning and Land Use
Project Processing Counter
5201 Ruffin Road – Suite B
San Diego, CA 92123-1666

**SUBJECT COUNTY OF SAN DIEGO GENERAL PLAN UPDATE 2020,
LOG NO. 02-ZA-001, ENVIRONMENTAL IMPACT REPORT
SCOPE AND CONTENT**

Dear Sir:

In response to your request for input on the scope and content of the Environmental Impact Report, the Board of Directors of the Vista Fire Protection District have approved the following comments:

1. Transportation and Traffic: One of the issues to be addressed is “inadequate emergency access”. We need some strong policies concerning the necessity of making connections between communities, and across physical obstructions, and through large open space areas. The policies for the protection of human lives and their improved property must be strong enough to effectively challenge conflicting policies related to competing issues.
2. Land Use and Planning: Access to timely emergency services should be as essential to development approval as access to a water supply, or a sewer connection, or any other utility. Without it, development should be restricted to “rural” size and scope, with increased setbacks.
3. Public Services: Similar to the above, the availability of emergency services ought to be a consideration in the development approval process. That means not just whether an adequate road system exists and hydrants are installed, but whether emergency services are available to travel those roads and arrive in a reasonable time frame. Density, building size, built-in systems, etc., should all be adjusted to reduce the potential risks in areas with sub-standard emergency services.

175 N. MELROSE DRIVE
VISTA, CA 92083
(760) 726-2144

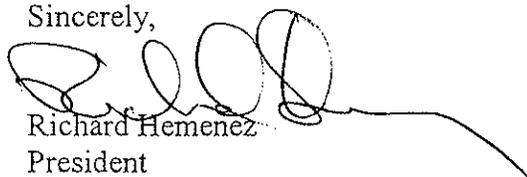
4. Environmental Issues: Approval of residential and other development in interface areas should include the automatic approval of Vegetation Management (VM) actions necessary to protect that development from wildland fires. The Vista Fire Protection District has a plan for the fire district that calls for graduated VM requirements out as far as 300 feet under some circumstances. VM requirements need to consider property lines, and when new development is proposed the VM setback from the property line (or an easement for VM on the adjacent property) should be required as a condition of approval. These VM requirements should be considered a required part of the development, and not as damage to the open space adjacent to the development. Construction methods and materials should act as a barrier to fire spread from open space areas into developed areas by including non combustibile exterior treatments and other appropriate design features.
5. Hazards and Hazardous Materials: This may be where most of the emergency services policies belong, but acknowledgement and direction of the reader to these policies should be included in several other places in the EIR, so that the competing interests are understood.
6. Utilities and Service Systems: In some plans, restrictions on the availability of utilities are used as land use controls. This should not be permitted under General Plan Update 2020. Land use decisions should be able to stand or fall on their own merits. Restricting utilities, in order to support a land use decision, is "zoning by plumbing". In the existing rural areas development exists that could benefit by extension of utilities to them, and the land use should not prevent that extension if the property owner is willing to pay for it. At the same time, the extension of utilities should not "permit" the change of the land use designations of the adjacent land. For example, an existing home in an environmentally sensitive rural area could have a water well and a septic system. If water and sewer systems were close enough to be extended, that home would become less of an environmental risk because water and sewer becomes a more "closed" system. Land use should not change if the extensions were approved.

Water utilities, and a minimum and by county code, should be required to provide and maintain fire hydrants spaced per the fire code on water systems with available storage capacities of 10,000 gallons or more. With storage of 100,000 gallons or more a minimum fire flow of 2,000 gpm should be required.

7. Cumulative Impacts: The cumulative impact of development is to increase the need for fire protection / emergency medical facilities, equipment, and personnel. Often large developments are recognized as creating an impact sufficient to require mitigation, such as providing a site and construction of a fire station. What is often missed is that several smaller developments may cumulatively create the same need. A standard per-unit impact for fire protection / emergency medical facilities and equipment should be created, that works like the traffic impacts created by average daily trip calculations.

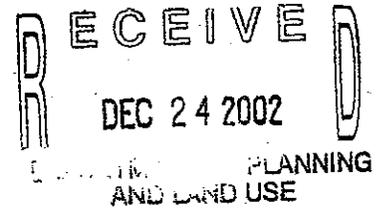
Please keep us informed of the progress of the General Plan Update, and any policies related to the issue listed above.

Sincerely,



Richard Hemenez
President

Borrego Springs Community Sponsor Group
P. O. Box 1371
Borrego Springs, CA 92004
December 20th, 2002



Mr. Gary L. Pryor, Director
County of San Diego
Department of Planning and Land Use
5201 Ruffin Road, Suite B
San Diego, CA 92123-1666

RE: Notice of Preparation of an Environmental Impact Report for the County of San Diego General Plan Update 2020 Log No. 02-ZA-001 undated

Dear Mr. Pryor:

We understand that, if The Project allows grading and clearing land in the desert by right, i.e., without a major use permit that will trigger an environmental review, then the EIR for The Project must itself address in detail potential, significant, adverse, environmental impacts of such activity. There are a number of these in the Borrego Valley. They include, but are by no means limited to, the following:

- Those on air quality caused by dust from additional scoured land and smoke from additional agricultural burning;
- Those on groundwater caused by increasing the already serious over draft and potential contamination of our sole source aquifer;
- Those on native plant and animal populations by direct native habitat destruction and by further lowering the water table, thereby severely diminishing the sub-surface and surface water on which these populations rely. For example, springs, such as those once plentiful in the Valley, are only present where the water table intersects the land surface;
- Those on cultural resources through disturbance or outright destruction of the many unmapped archeological sites in the Valley;

We further understand that, the EIR must detail methods that will be employed to assure adequate mitigation of each of these impacts or it will not meet the requirements of the California Environmental Quality Act (CEQA).

We would like to know, therefore, whether the Department of Land use and Planning intends to address these and other environmental issues at the Project level with a

Gary L. Pryor
EIR for G.P. 20/20
12/21/2002
Page 2

comprehensive EIR, or at the Plan level on a case by case basis. If the latter, then we would also like to know what mechanisms will be put in place to ensure compliance at the Plan level and what sanctions will be imposed for failure to comply.

Thank you for your consideration. We look forward to your response.

Sincerely,


Duane Bright, Chair

cc: Members of the San Diego County Board of Supervisors



Del Dios/Mt Isreal Town Council
20155 Elm St, Escondido, California 92029

December 16, 2002

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

RE: Community Comments to Notice of County 2020 Plan EIR Preparation, Log No. 02-ZA-001

Dear Mr. Pryor:

The Board of Directors of the Del Dios/Mt. Israel Town Council, an group elected to represent the interests of the community, would like to take this opportunity to comment of the scope of the EIR preparation referenced above. The Board has gathered comments from members of the community and speaks on behalf of the residents of the community. There are many aspects of the County General Plan Update 2020 affecting the Del Dios area that are of great concern to the residents and to those who are interested in preserving one of the most unique rural areas of the County. We are committed to diligence on these issues.

Outlined below are comments to the scope of the proposed EIR that we have determined must be considered.

Please direct any questions regarding these EIR comments to:

Drusilla Cursi
Board Member, document preparer
20116 Lake Drive, Escondido, CA92029
858-655-4029
email: bluefutureproductions@hotmail.com

and as an alternate,

Stacy McCline
Chairman of Board
20050 Lake Drive, Escondido, CA 92029
760-741-3533
email: smccline@cox.net

1. GENERAL PLAN AREA

The General Plan and the proposed EIR applies to all unincorporated areas of the County. Considering the diverse issues, terrain and activities of these unincorporated areas, it is not reasonable to assume that a single plan or EIR can adequately determine the true environmental impact for each area. Del Dios, referred to as the San Pasqual Valley-Lake Hodges Area, is currently included in the San Dieguito Planning Group. Del Dios area has special characteristics such as City-owned lots, 55-mile park, trail systems and five wildlife corridors and unique community "flavor", habitat, recreational use, water resources and proximity to rapidly growing urban and unincorporated areas. A more reasonable and complete approach would be to remove the entire Del Dios/Lake Hodges area from this EIR and prepare a separate EIR for the Del Dios area, removing it from the San Dieguito Planning Group, based on a redefined mapped area of the General Plan. A newly define mapping should include the central portion of the Lake Hodges Basin, Mt. Israel, El Cielo and portions of Harmony Grove as they affect the environment of Del Dios. Private advisors to the Board are prepared to supply specific map line recommendations. The results of this second EIR should be binding and should therefore require any planned development to consider and answer to the special considerations of this entirely unique area.

2. AESTHETICS

The views should be considered from Lake Hodges, the Major Focus Area of the San Dieguito River Park, as well as from Route I-15 and Del Dios Highway. The views from the trail system of Elfin Forest Reserve and the ridgeline trail above Olivenhain Dam should be considered and preserved. Additionally, the EIR should be scoped to include negative affects of future development on the unique appearance and habitat of the existing structures in the Del Dios. A portion of this must also consider the affect of any potential improvements to the recreational areas of Lake Hodges and San Diego River Park. The existing undeveloped, County-owned areas within the community should be given special attention for they present a great risk to the existing positive aesthetic. The negative impact of new businesses, removal of any mature native trees, development and/or improvement of any roads, walking paths, easements, or access routes should be considered.

3. AIR QUALITY

Due to the Del Dios/Lake Hodges Basin geography air quality stands at risk due to neighboring development, traffic and continual use of community roads by non-residents for travel to Escondido, Rancho Bernardo or Coastal areas. This condition can only worsen as the Harmony Grove/Olivenhain, Crosby Estates and Cielo community build out and the proposed Lake Hodges Dam improvement draw recreational area users. Studies should include estimates on air quality effects of expected traffic growth along the Del Dios Highway, Via Rancho Parkway, Crosby Estates, and Cielo. The results should then be applied and analyzed to the effect on residential dwellings, foliage close-to-road (within 500 feet), trees and streams, and natural run-off creeks. The air quality effect of various types of powered boats on Lake Hodges and the expected increase in tourists and San Diego County resident lake use after the San Diego River Park and Lake Hodges Dam renovation are complete should be considered. The study should gather data such that it can be applied to recommendations for traffic control, lake recreational use control, and neighborhood business limitations.

4. BIOLOGICAL RESOURCES

The Del Dios area/Lake Hodges Basin has remained largely unchanged and unspoiled for many years. However, the recent growth of neighboring communities has begun to take a toll on animal behavior

patterns, foliage, and non-populated habitat. The area is unique in that it is a complex system fed by five year-round springs and creeks. These and the surrounding riparian, chamissal, coastal oak, and scrub habitat provide homes to Duskyfooted Woodrats, Mule Deer, Red Diamond Rattlesnakes, California Gnatcatchers, Roadrunners, Golden Eagles and other species of concern. Endangered plants include the Encinitas bacharris. Five wildlife corridors have been identified through the community of Del Dios. Maintaining the existing conditions of these resources and habitats is essential and could be a key element in determining the future of the area.

The EIR must include studies to that compare previous studies and data of conditions of biological resources with those present now and expected as a result of any changes to Del Dios or neighboring communities proposed by the GENERAL PLAN. Additionally the EIR should produce data to challenge the assumption stated in the San Diego City MSCP that the Del Dios area is non-native vegetation and the current status with the County as an area without protective agreements. The studies must be geared to determine the impact on biological resources of the Del Dios area of humans, domestic animals, changes to existing dwellings, new development for private, commercial or recreational use, development or improvement of roads leading to the area or within the area and neighboring communities.

Specific focus of studies should produce data on the effect to biological resources addressing each of the following:

- Lot size and density: Low density housing, with open areas, mature foliage allows the habitat to be contiguous for threatened or endangered species. Consideration should also be given to whether Del Dios is or could be a refuge to species recently displaced by the growth of other nearby rural area and coastal areas.
- Runoff: Polluted runoff can have serious effects to all species within its sphere. It is usually a result of development pavement, roads, grass parks and golf courses and business or private disposal of hazardous materials and chemicals. A study should be performed to include especially the effect of those caused by traffic through the Del Dios. The trails throughout the area are experienced littering at an increasingly rate. There are 3 wells that supply water to the community and the effect of runoff to these wells must be studied.
- Human Impact: Currently Lake Hodges is open to the public for fishing and boating seven months, at three days per week, starting at 5:30 am. These limitations allow a "resting period" throughout each week and during a portion of the year to the great benefit of residents and species. There are no controls preventing car-camping on lake access roads during the peak season or strict restriction on boat motor size or type. As improvements are made to the recreational area of the lake there will be an increased use. The EIR should address the affect of any increased "open times" for lake use and expected increase in visitors. It is even recommend that the 5:30 am starting time could have a negative affect on animals. Negative impacts on biological systems and species should be studied by species. These risks could be increased fire risk, light pollution at night, noise, traffic and habitat destruction and increased littering.
- City-owned Open Space: The City currently has the privilege of owning several lots within the community of Del Dios. These lots provide distance between housing and native animals, allowing a low human-impact area. Native vegetation fills many of these lots and non-native vegetations, threatening the native vegetation, can be easily removed. Any development for any other use than natural open space is likely to have an adverse affect on many species. The EIR should conduct complete studies of the open space and its benefits and make recommendations for its use. The adverse affect of "grass parks and recreational use" should be included.
- Fire Risk: The EIR should address the heightened risk of catastrophic fire hazard to both plant and animal habitat and human life. The area is served as an annex to the Escondido Fire

Department. Development of surrounding areas near the Del Dios community could increase the fire risk. Increased recreation use could increase fire-risk.

5. CULTURAL RESOURCES

The area around Lake Hodges must be treated uniquely in studies performed under the EIR. The area has many Kumeayee sites, including the Piedras Pintadas and "Ringing Rocks." All around the Lake and in the watercourses feeding it are Kumeayee grinding rocks. The area below the Lake Hodges Dam includes the Harris sites of major paleontological importance. The latter are among the oldest human habitation sites in North America, being 12,000 years old. Other such sites may well exist in the Lake Hodges Basin. Geological resources include ancient Santiago lava flows, Lusardi cobbles, Pudding stone and up-lift structures.

6. GEOLOGY AND SOILS

Lake Hodges Reservoir will become part of the Emergency Supply Project in 2008. Currently, low density, septic-supported homes maintain a tenuous balance with the water supply. The EIR must review statistics from the City Manager's Report 96-64. Studies must include an analysis of the impact of any development on private or County-owned lots. Additionally, the study should include separate data on the recreational use areas of the lake, trails and adjacent hillside. Data gathered on runoff from other portions of the EIR should be considered here.

The EIR should identify key areas within Del Dios/Lake Hodges and across to Mt. Israel that are sensitive or unstable geological conditions where further human impact, of development impact could cause damage to habitat or present a condition hazardous to humans.

7. HYDROLOGY AND WATER QUALITY

The greatest threat to the Del Dios water quality is by runoff. Since much of the existing community is largely unpaved, natural foliage is excellent for reducing runoff pollution. Runoff problems are likely to occur as part of paving trails, roads, increased traffic on Del Dios and Lake Drive and development of Mt. Israel, and neighboring hillsides. The EIR must study the expected effect of these potential changes and use the data to recommend limitations.

Water quality of Lake Hodges should be studied with respect to boating activities because these activities are expected to increase. The EIR must review studies of water quality performed previously on reservoirs, lagoons and bays in the San Diego County and other parts of California. Water quality histories must be reviewed. Data collected from previous studies should be used to form boating restrictions such as forbidding 2-cycles engines and limited the number of day-use permits during peak season.

8. HAZARDS AND HAZRDOUS MATERIALS

The limited rainfall of the last few years has left much of the wooded areas along trails dry. This places the community of Del Dios at high risk for fire, considering the brush and flammable vegetation as hazards. The EIR must determine what adequate steps must be taken in order to decrease this risk to homes, and still maintain the habitats and natural character of the area. Below in Section 12, Public Services, the need for increase trail maintenance and fire hazard patrols should be considered.

9. LAND USE AND PLANNING

The EIR should give special attention to City-owned lots within the Del Dios Area as described in Sections 2, 4 and 7 above. It is believed that previous lots of this type are currently being developed for purposes other than the expected use of leech fields. Studies should include an analysis of the needs for further adjacent leech fields by existing dwellings in order assure water quality.

10. POPULATION AND HOUSING

Human impact is a great risk as described in Section 4 above. The EIR should address the issues as described in that section when considering the effects of increased population density and housing. Areas neighboring Del Dios should also be considered as affecting the environment. Special study should be given to the impact on the Del Dios environment of adjacent areas with respect to requirements for improved or expanded roads to accommodate increased traffic.

11. NOISE

Noise in the Del Dios area could increase if recreational area is open longer hours and do not adequately restrict the type of boats allowed on the Lake. The community currently enjoys a mostly quiet, natural noisescap. The EIR should determine the current level of noise during weekday and weekend hours and analyze the impact of increased traffic to and from adjacent areas, such as along Del Dios highway, and increased noise from the Lake Hodges recreational area.

12. PUBLIC SERVICES

The low level of current public services such as fire control, and police surveillance and lake use violations that current exist in the Del Dios/Lake Hodge area may not be able to support increased population in the area or of use by neighboring communities. The EIR should determine the correct level of public services required to support anticipated population such that they and related activities do not compromise biological resources, noise and air quality as described in Sections 3, 4, 7 and 11 above. Again, dangerous.

13. RECREATION

Recreation in the Del Dios /Lake Hodges area should be considered separately from the surrounding areas to be considered in the EIR due to the unique character and environment as described in Sections 4, 5, 7 and 11 above. The recreational use of designated parks and recreation area should be studied with respect to their proximity to residences. In many parks and lake recreational areas, residences are further from the central portion of those types of areas than they are in Del Dios. The effect of the future population growth and Lake Hodges improvements on the natural resources and character should be studied. Recreation on the lake should be given special consideration with respect to water quality and noise which could produce adverse affects. The effects of any acceleration of physical deterioration of the area caused by increased recreation on residents should also be considered.

14. TRANSPORTATION AND TRAFFIC

Traffic is of a growing concern within the Del Dios community. Many persons, not residents of Del Dios, now frequently use Lake Drive as a way of avoiding the long line of traffic along Del Dios Highway to Via Ranch Parkway. This occurs in the morning hours and again in the evening. The EIR must evaluate the current problem, estimate the impact of increased population growth in neighboring communities which could worsen the problem and strive to find creative solutions to prevent it that have little impact on the Del Dios community. Because of the rural aesthetic of the Del Dios area, sidewalks would be inappropriate. Increased traffic on Lake Drive, which is a curving road, during peak hours, poses an increasing safety risk to residents, equestrians and persons frequenting the local businesses. Recommendations of lowering speed limit along Lake Drive and adding additional traffic control should be considered as deterrent methods of reducing traffic as well as improvements to Via Rancho Parkway to Del Dios Highway.

15. UTILITIES AND SERVICE SYSTEMS

The community of Del Dios is served by a local water company drawing on community wells. The supply is adequate for the existing population but may be strained by any development, even the development of the 225 lots sold by the City. The water distribution system is sub-standard and contributes 40% of the weighting to a low ISO fire-fighting rating. This poses a risk to the community which would be exacerbated by any development. Fire insurance is already difficult to obtain or afford in Del Dios. There are no storm drains, although the community lies next to a drinking water reservoir. The EIR should determine the adverse affects of any development within this area.

**Descanso Planning Group
P.O. Box 38
Descanso, CA
91916**

December 13, 2002

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

RE: Environmental Impact Report Scoping Issues, LOG NO. 02-ZA-001
General Plan Update 2020

Dear Sirs,

Thank you for the opportunity to respond to this proposed action. Our group has reviewed the given information and has several issues and comments.

1. Regional Location Map, Central Mountain Lawsuit GPA 91-02

The presented scope of work indicates that the 2020 EIR will satisfy a court ruling that found inadequate a previous EIR for the Central Mountain Subregion. The given regional location map shows the Central Mountain Subregion as an area bordered by the Julian, Cuyamaca, and Descanso planning areas. The area impacted by the GPA 91-02 lawsuit is the existing Central Mountain Community Plan, Part XIX of the current General Plan; an area that consists of the Descanso, Pine Valley, Cuyamaca and a "No Sponsor Group" planning areas. Since this 2020 EIR is satisfying conditions of the 92-01 lawsuit, the EIR location map should accurately describe the effected boundaries.

2. Planning Group Boundaries

The Descanso Planning Group has requested boundary changes for a small portion of the Cuyamaca planning area and have requested that most of the "No Sponsor Group Area" be transferred to Descanso's jurisdiction. This area includes north along Boulder Creek Road to Cedar Creek Road then west to the Ramona Planning Area boundary. Primary access to this area is through Descanso and would provide a more logical geographic, political and traditional representation for this area. We have also requested a removal of the "2000' Area of Mutual Concern" between the Pine Valley and Descanso Group planning areas.

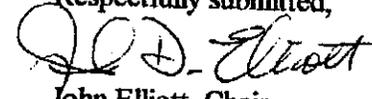
3. Density Maps

Due to the scale of the attached GP2020 Preliminary Regional Structure Map, it is difficult to determine the structure that is being proposed for EIR analysis. Clearer, more defined maps are needed to avoid confusion and provide for more accurate public input and analysis. We are requesting that the EIR use the Community

Structure Map that was developed and approved by the Descanso Planning Group.
This map is on file with the Department of Planning and Land Use.

Thank you again for this opportunity to provide input on the NOP for this 2020 EIR

Respectfully submitted,


John Elliott, Chair
Descanso Planning Group

**2002-03 Board Members:**

Evclyn Alemani
Mid Hoppenrath
Bill Telesco
Nancy Reed
Patti Newton
Eric Anderson
Janet McGurk
Rachel Barnes
Karen Gartner

20223 Elfin Forest Rd. Elfin Forest, CA 92029

December 16th, 2002

Gary Pryor, Director
Department of Planning and Land Use, Suite B, San Diego, CA 92123-1666

Re: GP 2020 EIR NOP—ENV. Review number: Log no. 02-ZA-001

Dear Mr. Pryor:

The Elfin Forest Harmony Grove Town Council appreciates this opportunity to review the GP 2020 EIR NOP. We would request that the County of San Diego note the following items during their preparation of this EIR:

- 1.) Amend the boundaries of the San Dieguito Planning Area to include the communities of Harmony Grove and Eden Valley (boundaries described elsewhere).
- 2) Address the pattern of circulation elements, including but not limited to, SC 1375, SC 1370, and SA 550, and nearby City of Escondido proposed and existing roads, such as Citracado, so that these roads do not adversely affect the traffic patterns for both the existing and planned community. It is especially important that the expected increase in commuter traffic from the Harmony Grove Village development is routed away from Country Club Drive and Kauana Loa, which support many residential driveways.
- 3) Allow regional collector roads that serve as residential streets for rural communities, such as Country Club Drive and Kauana Loa, to be reclassified and given lower speed limits more compatible with their true function. This is especially important given the future alignment of Citracado and its proposed intersection with Harmony Grove Road.
- 4) Downgrade Harmony Grove Road and classify it as a scenic highway.
- 5) Enact whatever policies or ordinances may be necessary to support community plan texts and enable residents to preserve and protect their unique community character.
- 6) Adjust zoning ordinances to allow, as part of a thoughtful comprehensive community plan, the keeping of livestock on a limited basis on the one-half acre residential lots that have become necessary in heretofore rural areas to comply with increased population projections.

7) Support the continued presence of a Regional Trail Network by requiring developers to share the financial burdens of not just creating but maintaining trails within or near their projects.

8) Protect natural waterways by discouraging channelization and encouraging restoration of creeks and riparian areas. Encourage the creation of a regional or community parks along scenic local waterways such as Escondido Creek and its Country Club tributary.

9) Enact policies or ordinances that would support rural county communities wishing to discourage city annexation of local land, when such annexation is considered solely to increase density for speculative development and threatens the cohesiveness of the existing rural community.

Sincerely,

Mid Hoppenrath
Member, Board of Directors,
Elfin Forest / Harmony Grove Town Council

cc: Dahvia Locke, County Land Use Planner; Howard Blackson, County Urban Designer; Ken King, Chairman, San Dieguito Planning Group



*Palomar Mountain
Planning Organization*

P.O. Box 145
Palomar Mountain, CA 92060-0145



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DEPARTMENT OF PLANNING
AND LAND USE

12/9/02

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

Reference: Environmental Impact Report for the County of San Diego General Plan
Update 2020 Log No. 02-ZA-001

PMPO requests that the EIR include as an alternative the designation of Country Town
for the Palomar Mountain community. The Country Town designation has been requested
by PMPO and should be evaluated as part of the EIR process.

Bruce Graves
Chairman PMPO

*****RAMONA COMMUNITY PLANNING GROUP*****
POST OFFICE BOX 803, RAMONA, CALIFORNIA 92065
Phone: (760)789-0406

December 15, 2002

Gary Pryor, Director
Department of Planning and Land Use
5201 Ruffin Rd., Ste. B
San Diego, CA 92123

RE: NOTICE OF PREPARATION OF AN EIR FOR THE
COUNTY OF SAN DIEGO GENERAL PLAN UPDATE 2020
LOG NO. 02-ZA-001

At the meeting December 13, 2002, the Ramona Community Planning Group took the following action:

**MOTION: SEND AHOPE COMMENTS AND CONCERNS ON GP 2020
NOTICE OF PREPARATION OF EIR TO DPLU AS THE RCPG
COMMENTS ON THIS PROJECT.**

The Motion passed 11-0-0-4, with 11 yes votes and 4 absent.

Comments include:

Water Related Issues:

- A total analysis of impact on existing wells and groundwater resources is mandatory.
- How does the County define the western/eastern portions of the County, CWA line?
- How will the new GP 2020 impact the tourist industry and stormwater runoff and non-point source pollution? Who does the hydrology study?
- Outside hydrology experts are needed. Who produces the data and who verifies it? What are the long term water needs and where are increased supplies coming from and at what costs to users? How will groundwater dependent areas be protected?

Density Based Issues:

- Is the density-based approach to the number of lots determined before or after constraints are factored in?
- Will density-based dwelling units per acre apply to number of homes before or after the constraints map?

Recreation Issues:

- What types of and locations for increased recreational needs are being

Log No. 02-ZA-001

-2-

December 15, 2002

planned?

Infrastructure Issues:

- How will 2020 plan meet the costs of new infrastructure associated with growth?

Employment/Population Issues:

- How will 2020 plan meet the creation of new jobs needed for the new residents?
- How will the County attract new personnel (doctors, nurses, etc.) to meet the needs of growth?
- How does the plan intend to control hitting target population estimates? Do target populations include second dwelling units? Does the EIR include a feasibility study of growth rate caps to spread growth out over the duration of the Plan?
- The City of San Diego has reduced its estimates of how fast the city is growing; has the County done likewise or is the County to absorb the growth the City won't take?
- Does GP 2020 accommodate hospital/emergency care/evacuations in the event of a natural disaster or act of war?
- Is there a concurrent economic feasibility study projecting growth in economy versus costs to taxpayers to accommodate growth?
- Is there an economic study being undertaken to study the impacts of slow/no growth plan? If not, why not?

Environmental Issues:

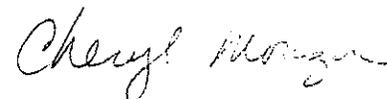
- What is the contingency plan if MSCP resources monitoring data shows negative impacts to species of special concern, endangered habitats/species, etc., with this increased growth? Is GP 2020 being developed cooperatively with the MSCP maps?

Other:

- What are reduced project alternatives criteria?

Sincerely,

for
Kristi Mansolf, Secretary
SAM MITCHELL, Chair
Ramona Community Planning Group



To: DPLU

10 Dec. 2002

From: John Ferguson, Chairman,
Spring Valley Community Planning Group,
P.O. Box 1637
Spring Valley, CA 91979-1637

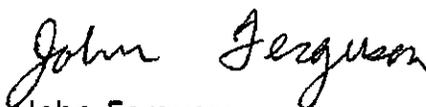
Subject: GP2020 EIR Notice of Preparation

We have received the notice of preparation for "County of San Diego General Plan Update 2020". We strongly object to two parts of this notice. The first problem is the sentence that "... this update will have the effect of focusing population capacity and development in the western portions of the unincorporated area ...". This statement presupposes a rezoning that has been opposed by the communities of Lakeside, Valle de Oro, and Spring Valley. Leaving this language in the notice of preparation would seem to prejudice the results in favor of the Special Interest Group instead of the people of these communities.

A second serious problem is the reliance on the map developed by the Special Interest Group in conjunction with DPLU. Specific objections to this map have been raised by many communities. Among others, the Spring Valley Community Planning Group has voted to refuse all rezoning in connection with the GP2020 process. Again, to rely on this map at this stage of the EIR process would seem to prejudice the results against the people in the western part of the unincorporated area of the County.

We ask that these two problem items be removed from the Notice and that it be re-issued without them.

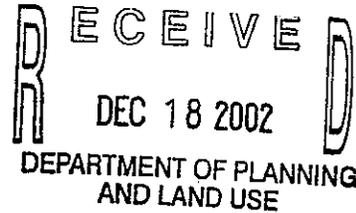
Voted on 10 December 2002 B-0-1 to ask for removal.



John Ferguson,
Chairman,
Spring Valley Community Planning Group

December 16, 2002

Mr. Ivan Holler
Chief of General Plan 2020
Department of Planning & Land Use
County of San Diego
5201 Ruffin Road, Suite B
San Diego, CA 92123



RE: Comments on Notice of Preparation of GP2020 EIR

Dear Ivan:

We appreciate this opportunity to provide comments on the Notice of Preparation of the County of San Diego General Plan 2020 (GP2020) Update EIR. On behalf of the Building Industry Association (BIA), the Alliance for Habitat Conservation (AHC), the San Diego Association of Realtors (SDAR), Save Our Land Values (SOLV), and the East County Construction Council (ECCC), we are submitting this joint comment letter on the Notice of Preparation.

We understand that many of the comments in this letter entail analyses that the County is already performing. We respectfully request that the County consider these comments in an effort to fine-tune the analyses. Essentially, we have separated our comments into the various categories of EIR issues. With regard to the evaluation in the EIR of housing and traffic impacts, we suggest the County use worst-case and best-case models to establish parameters into which the actual impacts will fall.

If there are questions or concerns with this letter, we welcome the opportunity to meet with the County to discuss our comments in more detail. We realize that our comments are quite extensive and we would be happy to assist the County in providing information and assistance that might aid in addressing these comments. They are as follows:

Land Use, Housing and Socioeconomics

Housing Capacity

We have broken our comments on housing capacity into three parts, the models, model constraints, and historical data. For each model, we propose that the EIR include a breakdown of the amount of units each land use designation would provide for each community. And with this information, the various capacities under the models of the Village Core, Core Support, Semi-Rural and Rural also could be tallied for each community.

Models: We suggest the EIR evaluate the housing capacity for each community under the following models:

1. ***Worst-Case Model (Vacant Land Analysis):*** This model would assume that existing land uses will not change within the GP2020 lifecycle to become the proposed new land uses allowed under the new designations and only vacant land will be developed.

It may be reasonable, if time permits, to augment this analysis through inclusion of underdeveloped parcels. The determination of whether underdeveloped parcels could reasonably be treated as having the same development potential as vacant parcels should be done on an individual basis. For example, a ten-acre or larger parcel with a single house on it in the Village Core or Core Support may be a good candidate for development, even though the parcel is not technically vacant. Factors to consider with individual parcels that fall into this category are: date of purchase and ownership (when was the parcel last purchased, is it owned by an individual or a business entity or trust?); ownership pattern (parcel among other underdeveloped and vacant parcels assembled under single ownership?); and the value of this parcel (including improvements) relative to the density development would achieve under the new General Plan. This additional analysis should be limited to the Village Core and Core Support areas and, in certain cases, Semi-Rural areas bordering the Core Support.

In the Village Core, Core Support and some areas of the Semi-Rural (SR), certain parcels with existing agricultural uses might more appropriately be treated as vacant, even though the existing land use is technically agriculture. If the parcel is part of an agricultural operation (structures such as greenhouses or a commercial component can be found on-site or on adjacent parcels under the same ownership), it is much less likely to be developed within the GP2020 lifecycle. However, if the parcel is host to a land use of marginal profitability or value relative to surrounding uses, such as dry farming or grazing, it may be appropriate to treat the parcel as if it were vacant. This assumption should be carefully applied in the Semi-Rural however, for it is unlikely that existing agricultural uses in the SR-4 (1 dwelling unit per 4 acres) and SR-10 land use designations, for example, will be developed into residential.

We highly recommend using current satellite aerials in the process of determining which parcels should be treated as vacant. It has been our experience that the County's GIS database of existing land uses, when compared with what is on the ground, is not accurate enough for this exercise.

2. ***Best-Case Model:*** This model would assume that the new General Plan land use designations will be fully implemented across each community, regardless of the existing land uses. This model would analyze the maximum theoretically capacity, adjusted for density losses traditionally experienced in the approval process, of the General Plan by treating each community as a blank slate.

3. **County Model:** The County's current methodology for determining housing capacity would be the third analysis of capacity. Our understanding of this model is that the model excludes areas largely built-out, instead using the current census data as the population capacity, and uses the gross acreage and proposed densities for determining the capacity of areas that are under or undeveloped.

Model Constraints: We propose using the following constraints in all of the models discussed above. We understand that time constraints and the level of analysis involved may make it difficult for the County to incorporate this much detail into the models.

1. **Land outside sewer and water districts:** In areas lacking existing or planned services, such as sewer and water, the models should incorporate an assumption that density would be reduced in the approval process. In areas significantly removed from services and without the reasonable prospect of road improvements adequate to serve development, the models should assume that no growth will occur.
2. **Encumbered Lands:** If possible, the models should remove existing and planned open space and public improvement dedications, lands falling within fee-owned Rights of Way, such as those in association with electric, gas and water utilities maintenance, and lands associated with existing and proposed electric, gas and water transmission corridors.
3. **Lands designated Rural:** Rural Land Use Designations of one dwelling unit per eighty acres (1 du/80 acres) and 1 du/160 acres might be analyzed at twenty five percent of the theoretical base density since these areas will likely not provide any significant contribution to the housing capacity and any development that might occur in these areas would be minimal and within the margin of error for the model. For the other two Rural Land Use Designations, 1 du/20 acres and 1 du/40 acres, the models might assume that only half the density proposed for these areas would be achieved. Ideally, if time permits, the determination of whether a parcel will likely be developed within the GP2020 lifecycle should be made on an individual basis through comprehensive ground-truthing for each community. However, we understand the time constraints the County is under, and that is why we offer this alternative to treating Rural Lands individually.
4. **Tentative Maps & Approved Subdivisions:** All the models should include approved and in-process (completed application) Tentative Maps (TM's), lot splits, minor and major subdivisions and boundary adjustments. The models, however, should be careful not to either neglect or overwrite approved or in-process TM's and in-process subdivisions. Recently approved minor subdivisions and lot splits should be treated similarly to TM's, for it is unlikely that a new application would be filed under the new General Plan for higher densities and more lots. Again, however, this would be a judgment call, for in certain cases, the subdivision or lot split may have been designed to provide

future subdivision, such as a subdivision of 40 acres into two or three parcels to be sold separately for future subdivision.

Historical Extrapolation: A comparative analysis would examine the historical annual approvals of lot splits, minor and major subdivisions and boundary adjustments, possibly tallying these numbers for what will be the separate regional categories within each community. This analysis would only consider projects that involved the creation of new lots. When performed for individual communities, with the anticipated population growth forecast and the data from the models, through extrapolation, these historical data might provide a good reference for evaluating the accuracy and predictability of the models, particularly in the Village Core, Core Support and Semi-Rural areas. Ultimately, the County's obligation to meet the housing demand will boil down to its ability to issue building permits at a rate that keeps pace with the growth, however, with respect to historical data, lot creation might be relevant to understanding the accuracy of some of the assumptions used to determine the capacity of the General Plan under the various models.

Census Data, Demographics & Housing Demand

The determination of future housing demand in the County should consider the age groups, income levels and family-sizes found in the various communities. Granted, in many communities, the existing demographics and income levels do not reflect that of the newer residents. However, the County's General Plan should ensure the provision of housing for all income levels as a regional partner in growth management. Over the last several years, SANDAG has prepared a number of relevant studies which would aid in determining the spectrum and various levels of the County's future housing demand. Attention should be given in particular to areas that provide the broadest range of employment and housing opportunities, and areas near or adjacent to freeways, major highways and roadways. Examples include: Lakeside, Spring Valley, Fallbrook, Ramona, Escondido, Alpine, and casino areas.

Casino Growth

The EIR should address the impacts casino growth will have on Land Use, Housing and Circulation. The casinos and accompanying resorts and retail will generate a need for housing. The casinos will also add to the need for commercial shopping centers containing grocery, apparel, home improvement stores and restaurants. The casinos will generate significant, and, in some cases, substantial, traffic impacts. All of these impacts – to Housing, Land Use and Circulation – should be included in the analysis of impacts for the EIR, particularly in the cumulative section. Otherwise, the EIR's cumulative analysis for these impacts would risk not being accurate and not serving future individual development projects as actual traffic conditions begin to exceed or not correspond with those analyzed in the EIR.

Regional Employment Centers

The EIR should address the need for housing regional employment centers will generate and the County's role in providing these types of housing. The EIR should include a discussion of whether the new General Plan could provide this housing under the housing capacity models discussed above.

Commercial and Industrial Land Uses

Capacity models similar to those discussed above for housing capacity should be performed for commercial and industrial uses. We request that the capacity in acreage of the various commercial and industrial land use designations be provided for each community under best and worst-case models. Existing and planned industrial business parks, retail centers, mixed-use projects, visitor commercial centers, general commercial, and light and heavy industrial uses should all be quantified and discussed in the General Plan EIR. The EIR should analyze the impacts the new General Plan and implementing ordinances and regulations would have on future commercial and industrial projects as well as the supply of land designated for commercial and industrial land uses.

Energy

It is our understanding that the new General Plan will include current and proposed future energy corridors and facilities. We request that electric, gas and water facilities and transmission corridors be identified in the General Plan and the impacts of siting those facilities and corridors be analyzed in the GP2020 EIR.

Circulation

For traffic impacts, we have broken our comments into three parts, the models, model baselines, and general comments.

Models: Cumulative traffic impacts should be determined for the three housing capacity models described above, if possible, applying the constraints described above when determining trip generation for constrained lands.

Model Baselines: Baseline traffic conditions should be established to begin the determination of traffic impacts under each housing capacity model described above. The baseline should begin with the existing conditions, or the best information available on existing conditions, and, consistent with the assumptions for that particular model, subtract all existing land uses with quantifiable trip generation assumed to disappear in that model. For example, a home in the Core Support area on ten acres that falls into the category of an "underdeveloped" parcel is generating twelve Average Daily Trips (ADT's). Thirty homes on the ten acres would generate 300 ADT's. The actual additional traffic impact of the project is 288 ADT's. Therefore, the 12 ADT's should be

removed from the quantity of existing ADT's for that road segment when determining the baseline.

Alternatively, depending on which model the County decides to utilize to analyze cumulative impacts, it may prove feasible to treat the impacts beginning with the existing conditions only as the baseline. By not removing from the baseline existing traffic impacts that would disappear with new projects, depending on how conservative the model chosen for the EIR turns out to be, a higher baseline would add a "buffer" into the analysis to provide added assurance that the predicted cumulative impacts will equal or exceed actual impacts.

General Comments: In areas where traffic impacts would result in Levels of Service (LOS) E and F, a discussion of new and sometimes unconventional traffic amelioration concepts should be included in the proposed mitigation for traffic impacts, as these concepts will likely become commonplace within the next twenty years.

Lastly, the EIR should discuss the impacts to traffic that regional employment centers and the casinos will have. Along certain highways and major roadways traversing the unincorporated areas, a significant share of the traffic will be generated by land uses outside the jurisdiction and control of the County, such as traffic heading to Carlsbad, San Marcos, Poway, Kearney Mesa, Miramar, Sorrento Valley and downtown San Diego. In other cases, land uses within the jurisdiction of the County will generate traffic from other jurisdictions, such as El Cajon, La Mesa and Santee. And in other cases still, traffic in certain areas may be generated outside of the County's jurisdiction and pass through the unincorporated area to areas outside of the County's jurisdiction, such as traffic from Temecula and traffic generated by the casinos. The traffic model should account for all these vehicle trips.

In the case of Temecula, if SANDAG's region-wide projection that 50,000 residences will be provided by Riverside County, the EIR should address the traffic impacts of these commuters and identify whether and where the County can minimize these traffic impacts on the region, such as by identifying additional employment centers along the I-15 corridor, or, alternatively, increasing densities within appropriate areas of the County to avoid the migration to Temecula.

Open Space, Conservation and Habitat Conservation Planning

The analysis of impacts to biology might treat the build-out of the existing General Plan as the baseline and compare the impacts that would have occurred under the existing General Plan and existing ordinances and regulations with those that would occur under the new General Plan. In particular, the EIR should address how Rural Land Use Designations, existing County, state and federal regulations, the future MSCP areas, and GP2020 implementation tools such as decoupling of lot size from the General Plan, alternative septic systems, and waivers for environmentally sensitive road design in biologically important areas will mitigate the biological impacts of the new General Plan.

In fact, it is our supposition that the following measures will fully mitigate the cumulative biological impacts of the new General Plan:

1. High conservation levels and sensitive design with development in Rural Lands
2. Proposed Equity mechanisms preserving large chunks of land
3. Future North County and East County MSCP's likely employing the equally protective preserve design, avoidance and preservation standards contained in the existing MSCP and BMO
4. Critical Habitat Designations over many lands found in the unincorporated area
5. Presence of Cleveland National Forest (CNF) and Cuyamaca and Anza Borrego State Parks
6. CNF Forest Conservation Initiative Overlay
7. Proposed GP2020 Implementation Tools
8. Existing highly restrictive state and federal regulations over stormwater and wetland impacts

We acknowledge that, given the on-going planning of a critical component of these proposed mitigation measures, which is the planning for the future expanded MSCP, it may not be possible to make the finding that cumulative biological impacts would be fully mitigated within the GP2020 lifecycle. However, for the period between adoption of the new General Plan and that of the future North County and East County MSCP's, we believe that a finding can be made that the other mitigation measures would suffice to fully mitigate the cumulative biological impacts that would occur during this interim period.

Economic Analysis

The General Plan 2020 Update will entail significant economic impacts to individual properties and communities, to the real estate, business, development and building industries, and to the region as a whole. Economic impacts should be evaluated both in terms of the effects to private industry and to the County of San Diego. We suggest the EIR examine the economic impacts with consideration of the following factors:

1. **Downzoning and Upzoning:** Downzoning may cause a loss of land value, whether immediately or through a loss of future potential land value, while upzoning may cause a gain in land value. However, constraining the supply of land through downzoning and increasing the cost of buying land with upzoning will have negative economic impacts on land use and housing. Higher development yields with upzoned property might entail positive economic impacts under certain circumstances.

Downzoning may also negatively impact sewer and water districts which may be relying on the build-out under the existing General Plan to fund future projects and expansions.

Downzoning will negatively impact farming operations that rely on property value to finance the operation. By precluding or constraining subdivision,

downzoning in the Rural will constrain the future supply of ten-acre and smaller lots for farming. We request that a distinct economic analysis of impacts to farming from the GP2020 Update be included in the EIR. That analysis should consider the following:

- a. A discussion of the conclusions reached on economic impacts to farming in the study performed for the AG-20 General Plan Update and how these conclusions are relevant to the GP2020 Update.
 - b. Considering that the AG-20 study determined that over 65% of the County's agricultural uses are on properties less than 9 acres in size, an evaluation of the new General Plan's ability to adequately provide for a ten-acre parcel size, particularly in Rural Lands, should be performed.
 - c. The constraint downzoning will have on the ability of large farms in the Rural to subdivide further.
 - d. The impact downzoning will have on land values and the ability of farmers to obtaining financing for their operations.
2. **Biological Mitigation and Future MSCP areas:** The recent Board action on Policy I-122 will increase the cost of mitigation land. The future North County and East County MSCP's may further constrain the supply of land and will increase the cost of mitigation as well as project design in these areas.
3. **Implementation Tools:** Proposed GP2020 Implementation tools such as equity mechanisms, clustering and the benefit of a Programmatic GP2020 EIR covering cumulative impacts should be considered to have positive economic impacts. Equity mechanisms may have both positive and negative impacts, however the positive impacts of equity mechanisms should be considered in relation to making the economic environment whole again.

It would be helpful to understand both the short-term and long-term economic impacts of the GP2020 Update, particularly with regard to the loss of tax revenue through downzoning and devaluation over time counteracted by potentially increased tax revenue from areas planned for increased development intensity and decreased per capita costs of providing services like police and fire and maintaining infrastructure with development being more concentrated. It is determined that the net economic impact to the County is positive, where appropriate, these savings might be reflected in future development fees.

Implementation Tools

We request that the GP2020 EIR amply discuss the proposed GP2020 Implementation Tools and the effects they should have on streamlining the development approval process, which include the following:

1. Clustering, decoupling of lot size and the density-based General Plan
2. Proposed Equity Mechanisms
3. Alternative Septic Systems
4. Removal of Community Plan text and rescinding of Board Policies restricting GPA's/Rezoning, package treatment plants, and extension of sewer districts.
5. Environmental waivers built into the Private Street Standards for road design in environmentally sensitive areas
6. Programmatic GP2020 EIR
7. Implementing Ordinances and Regulations, such as the Resource Protection Ordinance, the Zoning Ordinance, etc.

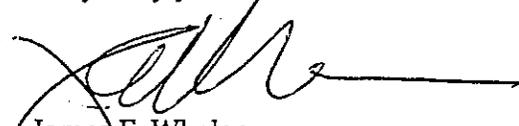
Adopted and Proposed Plans and Regulations

The EIR should address all adopted and proposed plans that would have either direct or indirect effects on implementation of the new General Plan. These plans include but may not be limited to:

1. SANDAG's Regional Transportation Plan
2. Sewer and Water District plans for infrastructure and capacity
3. County Water Authority 2000 Urban Water Management Plan
4. Sempra Utilities plans for electric and gas transmission lines and facilities
5. Regional Water Quality Control Board Stormwater Regulations
6. U.S. Fish & Wildlife Service Critical Habitat Designations (Final and Proposed)
7. Habitat Conservation Plans (City of San Diego MSCP, the MHCP, Existing County MSCP and Future North and East County MSCP's)
8. State law regulating General Planning (e.g., Assembly Bill 2292)
9. Pipelining of projects currently being process under the existing General Plan

Thank you for this opportunity to provide comments on the Notice of Preparation for General Plan 2020 Update EIR. We look forward to our continued involvement in the process.

Very truly yours,



James E. Whalen
Alliance for Habitat Conservation



Matthew Adams
Building Industry Association, et al.



1100 DEL RIO SOUTH, SUITE 100, SAN DIEGO, CA 92108
PHONE: (619) 584-5744 | FAX: (619) 584-5748
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RECEIVED
DEC 16 2002
DEPARTMENT OF PLANNING
AND LAND USE

December 12, 2002.

Subject: Comments on the Notice of Preparation (LOG No. 02-ZA-001) for the San Diego County General Plan Update

Dear Sir/Ma'am,

The Center on Policy Initiatives is a non-profit research organization focusing on the low-and middle income working families in San Diego County. Our primary concern is that issues related to low-income working families should not be brushed aside, and there should be sincere implementation of measures that mitigate the impacts caused by new development.

We hope that the cumulative growth issues related to jobs and housing will be adequately addresses and that there be enough safeguards to thwart the negative impacts of development.

Sincerely,

A handwritten signature in black ink, appearing to read 'Murtaza Baxamusa'.

Murtaza Baxamusa
Center on Policy Initiatives



THE DESERT PROTECTIVE COUNCIL, INC.

A NON-PROFIT ORGANIZATION

P.O. BOX 3635 • SAN DIEGO • CALIFORNIA 92163-1635

RECEIVED
DEC 16 2002
DEPARTMENT OF PLANNING
AND LAND USE

**DESERT PROTECTIVE COUNCIL
ADVISORY PANEL**

December 16, 2002,

SYLVIA BROADBENT
Professor of Archaeology

GEORGE W. COX
Conservation Ecologist

PETE DANGERMOND
Park Consultant

MARY DEDECKER
Botanist

BETTY FORGEY
Desert Tortoise Activist

MICHAEL FROME
Author

AUGUST FRUGE
Conservationist

LARRY IWERKS
Wilderness Advocate

WILBUR MAYHEW
Professor of Zoology

ART MONTANA
Earth Sciences

AL H
Bk

KAREN SAUSMAN
BioPark Director

ROBERT STEBBINS
Herpetologist

LEONARD VINCENT
Professor of Biology

FRANK WHEAT
Attorney

HOWARD WILSHIRE
Geologist

Department of Planning and Land Use
Project Processing Counter
5201 Ruffin Rd. Suite B
San Diego, CA

RE: Notice of Preparation of an Environmental Impact Report for the
County of San Diego General Plan Update 2020, Log no. 02-ZA-001

The Desert Protective Council is dedicated to the preservation and protection of the unique ecosystems of the Southwestern Deserts of North America. Thus we have a strong interest in ensuring that the General Plan of the County of San Diego provides adequate protection to the desert environment present in the County.

At this time, the country town of Borrego Springs and the surrounding Anza Borrego Desert State Park (ABDSP) are confronted with a serious water supply problem. The problem has been defined by the long term studies of the water level of the sole source aquifer of the Borrego Valley conducted by the County Hydrologist, John Peterson. Mr. Peterson's studies show an increasing rate of decline of the water level over the past 20 years, reaching as much as a three feet decline per year in some areas of the valley. Analyses prepared by the Groundwater Management Study organized by the Borrego Springs Water District were presented at a series of public meetings held from 1999 through 2002. The January 2001 Report of the Technical Committee showed that while that aquifer has an estimated 4,800 acre-feet inflow annually from rain in the adjacent mountains the annual use is approximately 22,300 acre-feet. The major portion of this use is agricultural, 15,590 acre-feet, with golf courses and commercial landscaping using 4,424 acre-feet and the remaining 2,272 acre-feet accounted for by residential users. Clearly, the current water uses of the valley are unsustainable.

It is imperative for the continued health and safety of the human residents of the Borrego Valley that the County plans for future uses in the valley take into consideration the consequences of the current mining of the water supply for commercial uses on the resident population, as well as on the biological resources of the area including the ABDSP. The long-term goal of the General Plan for this unique portion of San Diego County must be to eliminate heavy water uses such as certain types of agriculture and golf courses and non-native landscaping so that the overdraft of the aquifer will be eliminated.

Mark Jorgensen, Supervisor of the ABDSP, prepared a list of biological effects of the water depletion already observed by park biologists and some estimation of probable future scenarios. These observations and predictions can be found in a letter he wrote January 13, 1998. They should be addressed in the study of Biological Resources required in the EIR. If the County plans for the Borrego Springs area do not attempt to reduce water use in the valley to a sustainable level, the EIR must address the increasing impacts of continuing the aquifer depletion on the biological resources in the valley. Certainly there will be adverse effects on riparian habitats such as those found in Coyote Creek, Borrego Palm Canyon, Tubb Canyon, and Sentenac-Grapevine Canyon. Effects of the

To safeguard for wise and reverent use by this and succeeding generations those desert areas of unique scenic, scientific, historical, spiritual and recreational value, and, to educate children and adults to a better understanding of the deserts.

continued water depletion on species identified as endangered, sensitive, or special status such as Peninsular Bighorn Sheep, Least Bell's Vireo, Southwestern Willow Flycatcher, Desert Slender Salamander and other amphibians need to be analyzed in the EIR. Effects of aquifer depletion on plant communities such as Mesquite Bosque, California Fan Palm, Smoke Tree/Desert Willow/Ironwood, and Cottonwood/Willow should also be analyzed in the EIR.

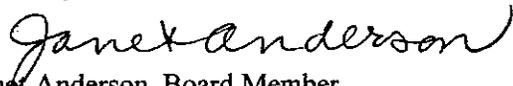
Obviously, a large part of the environmental analysis of continuing the aquifer depletion will be to address the hydrologic changes that will occur as the water table subsides including changes in the riparian areas as the surface water resources are reduced, but also the effects of plant desiccation and death on the surface soils throughout the valley. Changes in the water content and plant life of the surface soils will undoubtedly lead to changes in air quality as the dry soils without plant life are blown about.

Continued unsustainable use of water in the Borrego Valley will eventually lead to major changes in land use and these must be addressed in the EIR. Plans for increased residential and recreational uses in the valley will be completely changed when water becomes either unavailable, or more likely, unfit for human use. The Borrego Water District has explored the possibility of importing water into the valley. The conclusions of that study showed that there is no economically feasible source of imported water for the valley.

The life of the aquifer was estimated in a study done in 1985 (personal communication with Technical Committee member Clark Shimeall) to be nearly 100 years at the levels of use that were current in 1985. Mr. Peterson's water level studies show, and it is obvious to any frequent visitor or resident of the valley, that agricultural uses have increased substantially since 1985. Thus the 100-year number is outdated. Also, the same study, as quoted in the January 2001 Report of the Technical Committee, states that the water in the upper and middle aquifers could be depleted in as few as 35 years. Since that study was done about 17 years ago, and water uses have increased substantially in the meantime, the probable lifetime of water in the upper and middle levels of the aquifer is reduced to less than 18 years. The quality of the water in the lower level of the aquifer is, at this time, unknown.

The Desert Protective Council is concerned that County officials are unaware of the potential for serious outcomes if the uncontrolled mining of a single source aquifer continues in this area of the County that provides so much in the way of recreational uses and retirement housing to its citizens. The County and its citizens also have a responsibility to protect the Fish and Game designated Significant Natural Area of the Lower Willows area of the ABDSP. Certainly, the General Plan update that is currently underway in the County depends on Borrego Springs to provide residential housing in the county. In order to make a realistic prediction of Borrego Valley land uses and to provide protection for the significant natural resources of the area, the County must carefully examine the environmental consequences of the current aquifer overdraft and provide mechanisms to bring sustainability to the Borrego Valley aquifer.

Sincerely,



Janet Anderson, Board Member

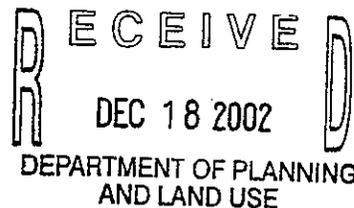


FARM BUREAU SAN DIEGO COUNTY

1670 East Valley Parkway, Escondido, CA 92027-2409

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December 16, 2002



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

Re: LOG NO. 02-ZA-001 General Plan Update 2020

The San Diego County Farm Bureau offers the following input on the content of the draft Environmental Impact Report (EIR) for the County of San Diego General Plan Update 2020 (Update) to be considered in addition to the environmental issues described in the Notice of Preparation.

Farmland Value

The EIR should evaluate the impact to property values of active farmland and land held in reserve for future agricultural expansion due to the project intent to direct population capacity to the generally western portions of the County while reducing future population growth in the generally eastern portions of the County. Because agricultural infrastructure, crop financing, and the financial health of farmers are often tied to farmland equity, the impact to a change in that equity must be addressed.

Housing

Within the EIR's housing discussion should be an analysis of the project's impact on the availability of housing for farm workers. The analysis would include the ability to provide on-farm housing as well as the affordability of housing for farm workers in the traditional housing mix.

Urban/Ag Interface

Lands slated for an increase in population density have, in many cases, a variety of successful agricultural uses. The EIR should consider the impacts to those agricultural uses from an adjacent concentration of population growth.

Equity Mechanisms

Because public acceptance of the Update may rely on the provision of equity mechanisms to facilitate the transfer of future population growth, the EIR should examine the impacts to owners of farmland with and without equity mechanisms.

Density -based Approach

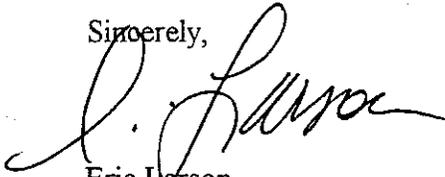
The replacement of residential lot size requirements with a density-based approach should be discussed in the EIR under each alternative as to the impacts on the long-term preservation of agricultural uses.

Agricultural Expansion

General Plans tend to deal extensively with the need to provide for reasonable expansion of residential and commercial uses. We would suggest that the EIR address impacts to the future expansion of agriculture from the provisions of the Update.

Thank you for your consideration and inclusion of our concerns in the preparation of the Environmental Impact Report for the County of San Diego General Plan Update 2020.

Sincerely,



Eric Larson
Executive Director

MOUNTAIN DEFENSE LEAGUE

184 Crockerham Drive
Escondido, CA 92060
P.F. 760.789.8134

16 December 2002

County of San Diego
Department of Planning and Land Use
6301 Ruffin Road
San Diego, CA 92121

Re: Notice of Preparation of an Environmental Impact Report for the County of San Diego General Plan Update 2020 (Reg. No. 02-2A-003)

Dear Department of Planning and Land Use (DPLU),

The Mountain Defense League is a grassroots organization dedicated to the protection of San Diego County's mountains, wildlands, and rural communities through wise land use planning. We are writing to comment on the Notice of Preparation of an Environmental Impact Report (EIR) for the County of San Diego General Plan Update 2020 (GP2020).

I. GP2020 FOCUS AND REPEAL OF SPECIFIC PLANNING AREAS (SPAs)

The Mountain Defense League (MDL) supports GP2020's stated focus to increasing "population capacity in the western portions of the County and reducing the potential for growth in the eastern areas". The western portions of the County contain most of the development in the County and have the necessary infrastructure to support more growth. We laud the County for putting the principles of Smart Growth to work in GP2020. We also support the proposed repeal of SPAs. These planning areas located near and outside our Rural Towns and are inappropriate for the concentrated, urban-style growth for which they plan. MDL suggests that the EIR for GP2020 contain an alternative that repeals the SPAs.

II. RURAL LANDS

The lands that the County will now designate Rural Lands are not only those lands devoted to agriculture and recreation. They are lands functioning as habitats for our flora and fauna. These lands connect public lands that also serve to protect San Diego County's natural resources. The Rural Lands act as buffers surrounding the important habitats comprising our National Forest, State Park, County Park, and BLM lands. Our Rural Lands serve both people as well as our native plants and animals.

If San Diego County's Rural Lands are to continue their dual purpose of serving both man and wildlife, they cannot be subdivided into such small lot sizes as to compromise their function for wildlife. We understand that these lands will have the lowest population density, but we worry that the density designated is not low enough. Many eminent scientists have commented on the value of these backcountry lands as habitat for wildlife (GPA 96-03 file: Dillendorfer, et al. 1999, Soule 2001 & 2002, Case & Dillendorfer 2002). These biological experts have stated that the minimum lot size necessary to retain their worth as wildlife habitat is at least 80 acres, if not more. We are aware of no population density in GP2020 of less than one dwelling unit per 40 acres. Please study the previous documentation recommending lot sizes for Ag20 lands, and the EIR for GP2020 should contain an alternative with the density of the backcountry Rural Lands no greater than one dwelling unit per 80 acres.

III. GROUNDWATER

San Diego County, for the most part, is an area lacking in groundwater. Some of its hydrological basins contain a very limited amount of groundwater and are particularly vulnerable to overproduction of this precious resource. Although the County's Groundwater Ordinance is supposed to protect these fragile areas from too much groundwater pumping, inappropriate development still continues in these notoriously dry areas.

The Mountain Defense League suggests that the EIR for GP2020 carefully study the vast amount of data it has collected in the County's well-monitoring program and note the disturbing trend of groundwater depletion in the backcountry areas. Analysis will show the danger in allowing these areas to contain large developments such as Station Oaks Spa/Resort in Descanso, Campo Hills Estates in Campo, Big Country Ranch and Stagecoach Springs Estates in Boulevard, Rainforest Ranch in Chihuahu Valley, and Jacumba Valley Ranch in Jacumba. San Diego's groundwater will not support this type of urban/suburban development. MDL also asks that the County redraft the Groundwater Ordinance to better protect our valuable and dwindling groundwater.

IV. WILLIAMSON ACT

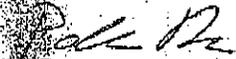
The Williamson Act is a product of California State legislation designed to protect our agricultural and open space lands from development. Recent legislation has increased the tax benefits offered to land owners that place their property under Williamson Act contracts. Unfortunately, San Diego County has not done anything to encourage property owners to take advantage of the benefits offered to both the property owner and the public by the Williamson Act. The individual in charge of the program for the County for many years is not supportive of the Williamson Act and discourages property owners from contracting their lands.

The Mountain Defense League suggests that San Diego County not repeal Williamson Act preserves. Instead, the County should increase the areas in preserves and put a County employee supportive of the Williamson Act in charge of running the program. We suggest that the GP2029 EIR study the deleterious effects that would result from repealing the Williamson Act preserves and restructure the program so that both property owners and the public can enjoy the resulting benefits.

V CONCLUSION

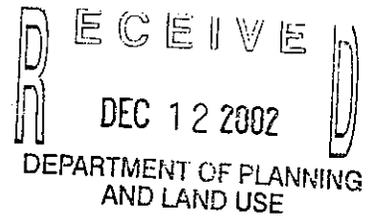
To summarize, the Mountain Defense League suggests that, in the process of drafting the EIR for GP2029, San Diego County: 1) Repeal the SPAs. 2) Designate backcountry Rural Lands with a population density no greater than one dwelling unit per 20 acres. 3) Draft a new Groundwater Ordinance. 4) Retain and restructure the Williamson Act Program.

Sincerely,



Pandora Rose
Director

Save Our Aquifer Coalition
P.O. 1397
Borrego Springs, CA 92004
December 9, 2002



Mr. Gary L. Pryor, Director
County of San Diego
Department of Planning and Land Use
5201 Ruffin Road, Suite B
San Diego, CA 92123-1666

RE: Notice of Preparation of an Environmental Impact Report for the County of San Diego General Plan Update 2020 Log No. 02-ZA-001 undated

Dear Mr. Pryor:

I write on behalf of The Save Our Aquifer Coalition (see Enclosure 1) in response to the document referenced above ("The NoP") to comment on the scope and content of environmental information to be contained in the Environmental Impact Report (hereafter "The EIR") as it pertains to the Borrego Valley. Located in the desert of eastern San Diego County, the Borrego Valley represents a unique situation within the county. As such, it deserves and requires special attention in The EIR. Enclosed is a two page summary of the ground water situation in the Borrego Valley (Enclosure 2) as background and context for my comments and included herein by reference.

Ground water and, in particular, long term conservation and preservation of the Borrego Valley aquifer is by far the most significant environmental issue for the Borrego Valley. Ironically, it is also the one that is most consistently ignored and neglected. It nonetheless intersects with many components of The County of San Diego General Plan Update 20/20 (hereafter "The Plan") and must figure prominently in The EIR for the region if it is to have any legitimacy.

The Project Description section of the above referenced NoP declares that one of the objectives of The Plan is to "and reduce potential for growth in eastern areas [of the County] ... to protect natural resources through reduction of population capacity in sensitive areas..." In the desert of eastern San Diego County, there is no more precious natural resource than water; and the Borrego Valley's sole source of water, the Borrego Valley aquifer, is already threatened by being drawn down at more than five times the recharge rate (see Enclosure 2). Thus an EIR that does not provide an especially careful, competent, thorough, detailed and objective technical analysis of the ground water situation in the Borrego Valley and effective ways of dealing with it cannot, should not, and will not be taken seriously for it would be inadequate on its face.

Also in the Project Description section, I note that, "Other components of The Project include: "Replace the existing Resource Protection Ordinance with updated resource protection standards in the General Plan and new County ordinances" and "Rescind outdated policies or ordinances and enact new implementing ordinances as needed..." Among those ordinances, standards and policies that must be updated, and outdated

policies or ordinances that must be rescinded, are any and all that may now permit new agriculture in the valley. It is imperative that the growth of agriculture in the Valley not only be stopped immediately, but reversed as soon as possible if we are to have any hope of extending the life of the Valley's sole source of potable water for more than a few years. The EIR must, therefore, frankly and honestly address and evaluate the full impact of agriculture on the long-term future of the Valley and its limited water supply.

As I understand it, if The Plan allows clearing and planting land in the desert by right, then The EIR for the plan must itself cover in detail the potential for significant adverse environmental impacts such as those on air quality caused by dust from clearing and tilling additional land and smoke from additional agricultural burning; on groundwater caused by increasing the already serious overdraft and potential contamination; on cultural resources through disturbance or outright destruction of the many unmapped archeological sites in the Valley; on plant and animal populations by destruction of critical habitat; on natural drainage patterns caused by damming and planting in stream beds; etc. Moreover, The EIR must detail methods that will be employed to assure mitigation of each of these impacts or it will not meet the requirements of California Environmental Quality Act.

In the Biological Resources section of the NoP I note that "The EIR will evaluate impacts in terms of: 1) potential adverse effects on any sensitive natural community ...". A number of plant and animal species are threatened and already adversely affected by long standing and severe overdraft of the Borrego Valley aquifer, e.g., the peninsular bighorn sheep (see Enclosure 2). The EIR, if it is to be credible, must address the adverse effect of the continuing overdraft on these.

The Hydrology and Water Quality section of the NoP promises that "With regard to water quality The EIR will determine, on a regional level, whether the project will ... cause or contribute to ... degradation of beneficial use..." Furthermore, "With regard to groundwater The EIR will analyze whether the project will substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level." There is and can be absolutely no question that, absent strict prohibition of new agriculture in the Valley supported by updated resource protection standards in the General Plan and new County ordinances, among other things, The Project will cause and contribute to degradation of beneficial use, substantially deplete groundwater supplies, and interfere substantially with groundwater recharge such that there would be both an additional net deficit in aquifer volume and further lowering of the local groundwater table level. The EIR must, therefore, address these issues for the Borrego Valley if it is to be considered more than a frivolous, pro forma exercise.

The Land Use and Planning section of the NoP states that "The EIR will identify potential land use conflicts resulting from the juxtaposition of proposed land use designations." Because agriculture is responsible for seventy per cent of water use in the Valley, and by extension an equal share of the overdraft, it conflicts with all other juxtaposed land uses and threatens to render the Valley in its entirety unusable for any purpose whatsoever, including agriculture, by rapidly depleting its only water supply.

The EIR must specifically address this singular issue or risk being declared irrelevant and inadequate.

According to the Utilities and Services Systems section of The NoP, The EIR purports to "discuss the regional location and types of infrastructure and service improvements that may be required to meet the anticipated demand of future growth and population." Specifically mentioned among these is the "water supply facility." Since the facility, i.e., infrastructure, is by itself of no use without water, the water source must of necessity be included in this discussion. In the Borrego Valley, the sole source of water is the Borrego Valley aquifer that is fast being depleted. Such a discussion is meaningless unless it addresses the issue of how to meet the anticipated demand of future growth and population in the face of a water supply that is already overtaxed and rapidly dwindling.

The Cumulative Impacts of The Plan on the Borrego Valley's water supply must also be addressed in The EIR. Such impacts undeniably rise to the level of "cumulatively considerable" for each of the subject areas identified above when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of future projects, all of which lack and are likely to lack adequate safeguards for the Valley's sole source of water unless The EIR addresses the issue specifically. The cumulatively considerable impact of not specifically addressing this issue in The EIR, and then not building appropriate safeguards into The Plan, is that the Valley will quickly be left without water; a "cumulatively considerable" impact indeed.

By the same token, the Long Term Environmental Effects of failing to arrest and roll back the overdraft will inevitably cause "significant irreversible environmental changes associated with General Plan buildout" that will rapidly exhaust the Valley's sole source of water and result in irreparable environmental damage (see Enclosure 2).

An EIR that does not contain effective ways to protect the natural environment from these obvious hazards would be ridiculous or worse. If the revised General Plan 2020 allows expansion of agriculture, then The EIR for the plan must show how the predictable, inevitable, and deleterious environmental impacts of expansion are to be mitigated. Failing that, it will be found wanting because it does not cover the full and foreseeable array of environmental impacts.

In summary, if The EIR is to have any credibility whatsoever for the Borrego Valley, it must confront forthrightly the issue of water as it affects and is affected by each component of The Plan. Water is the single most important, overriding and controlling issue in the Valley. It must, therefore, drive The EIR for the region. Any failure to seriously address it in all of its many aspects will vitiate both The EIR and The Plan.

Sincerely,



Dennis W. Dickinson, President

Enclosures (2)

Save Our Aquifer Coalition

MISSION STATEMENT

The mission of SOAC is to help ensure the preservation and quality of Borrego Valley groundwater through education, influence, research and action, for the purpose of sustaining the area's human, plant, and animal communities.

VISION STATEMENT

- Reduce the overdraft of Borrego Valley groundwater significantly within five years and bring demand and recharge into equilibrium within ten years or less.
- Ensure that all residents and business owners in the Borrego Valley, as well as elected officials and government agencies at all levels, understand the urgency and seriousness of the groundwater overdraft, and share the responsibility for eliminating it.
- Create an environment in which Borrego Valley residents are secure in the knowledge that there will be enough safe drinking water for generations to come.
- Ensure that the aquifer will be stabilized at a high enough level to support currently existing natural habitats and restore natural resources lost due to the overdraft.

Ground Water in the Borrego Valley

The resort/retirement community of Borrego Springs is located in the Borrego Valley, a seventy square mile area surrounded by the Anza-Borrego Desert State Park. It is San Diego County's only self-sufficient, desert community. The Valley is an isolated basin and studies show that importing water is not an option because of the extremely high cost. The Borrego Valley Aquifer is, therefore, the sole source of quality water for Borrego Springs and the Valley.

Unlike other desert states, California grants landowners rights to the groundwater under their property and offers little authority for managing an aquifer as a community resource. As Colorado River water becomes increasingly scarce and expensive, therefore, new lands in the Borrego Valley are being purchased and converted to agriculture by large corporations from as far away as Israel because water is free. As a result the number of acres cultivated in the valley has doubled since 1985.

Seventy per cent of the 22,300 acre/feet (1 acre/ft. = 326,000 gallons) of water pumped each year is already used by 4,000 acres of water intensive agriculture, twenty per cent by golf courses that make little attempt to conserve water, and only ten per cent by residential and all other commercial users, and the Anza-Borrego Desert State Park. Only residential, commercial, and park use is within the replenishment level of the aquifer.

The aquifer is thus being drawn down at a rate nearly five times the recharge rate with predictable result. The ground water level has been dropping about two feet per year for the past twenty years, but one test well fell eight feet between February and August this year. The over draft is already having a deleterious effect on flora and fauna in parts of the Anza-Borrego Desert State Park in and bordering the Borrego Valley, and threatens, among other things, the endangered Peninsular Bighorn Sheep, palm oases, major wildflower habitat, and mesquite woodland. Borrego Water District wells near the periphery of the aquifer that have produced high quality water for years are running dry and being abandoned as the ground water level and quality fall. There is an abundance of scientific and technical evidence indicating that, at projected extraction rates, the aquifer will reach a critical point in 35 years or less. Water quality will be

adversely effected long before that. Mortgage lenders are already inquiring about the longevity of the water supply as a condition of making real estate loans in the area.

Residents of the Valley are confronted with a situation that will, sooner than later, destroy our community and critical natural habitat in the Valley. All attempts to find a solution have failed. In part, the difficulty lies with a lack of leadership and guidance coupled with a studied ignorance of the unique, local situation on the part of the San Diego County Department of Land Use and Planning. Despite the very real threat to the aquifer, the San Diego County Board of Supervisors, the *de facto* local government and land use authority for this unincorporated area, recently dismissed out of hand a formal request from the community to limit or suspend conversion of undeveloped land in the Valley to agriculture in order to conserve water. The State declined a request for funds to purchase and fallow agricultural lands, the most promising approach, pleading poverty. Finally, there are a number of conflicting, vested interests involved, most of which have a constituency intent upon furthering its own ends at all costs

Attempts to cater for all these interest groups in a solution to the ground water problem have reduced all of the many and various local efforts to solve it to no more than well-intentioned dithering. Meanwhile, this lack of consensus has enabled elected officials and governmental agencies to demur with impunity.

The damage to human, plant, and animal communities in and around the Valley will be catastrophic if those interests that favor and require unrestricted water use prevail or are merely able to prevent effective action to reduce the wanton overdraft of the aquifer. It is a classic zero sum gain situation. Simple arithmetic demonstrates conclusively the hard truth that no solution can satisfy all, or even most, of the interests involved.

In short, residents of the Valley must very soon reduce water use to a sustainable level that is less than twenty per cent of what it is today. State law essentially offers no remedies short of a law suit. Government at all levels has failed and refused to provide any help. The future of Borrego Springs, the Borrego Valley, and significant portions of the Anza-Borrego Desert State Park are bleak indeed.



SIERRA CLUB, SAN DIEGO CHAPTER
San Diego and Imperial Counties
3820 Ray Street
San Diego, CA 92104-3623

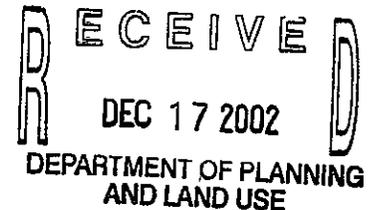
LATE

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Voice Mail (619) 299-1744
EBBS (619) 299-4018

December 16, 2002

Mr. Gary Pryor, Director
Mr. Ivan Holler, Chief of General Plan 2020
Dept. of Planning & Land Use
5201 Ruffin Rd., Suite B
San Diego CA 92123

RE: Notice of Preparation of County General Plan update 2020 EIR
Scope & Content Comments, Log No. 02-ZA-001



Dear Mr. Pryor and Mr. Holler:

Thank you for all your time working on this general plan update process and for consideration of the following comments.

1. Population targets in the unincorporated areas

a. If adopted, the population targets reflected in the draft Land Use Distribution Map will exceed the recent growth rate for the unincorporated areas. In light of the fact that the current growth in the unincorporated areas, combined with a sprawling development pattern, has resulted in numerous environmental problems such as congested roadways, air and water pollution, endangered and threatened species, loss of rural-scenic values and agricultural land, **the growth rate for these outlying areas should be reduced, not increased.**

b. The EIR should compare the impacts of a reduced growth rate with continuing or increasing the current growth rate in the unincorporated areas, analyzing and comparing, on a ground to plan basis, the impacts of the proposed growth on the many rural resources and the environment including: the circulation system, air and water quality, biological resources, rural scenic values, agriculture, groundwater supplies, important watershed areas and local water supplies. The Draft Land-Use Distribution Map shows vast areas of inefficient, "semi-rural" (semi-urban), sprawl categories that will greatly impact rural resources if adopted. This EIR comparison should conduct the above study with conversion of semi-rural categories to rural categories in proportion with the reduction of population growth target.

c. In light of the fact that there are limited funds for regional infrastructure needs and incorporated cities now suffer a deficit of infrastructure funding in the billions, the EIR should discuss the potential impact to infrastructure needs in incorporated areas should regional infrastructure funding be diverted for infrastructure to accommodate the proposed growth in the unincorporated areas. The EIR should evaluate the infrastructure needs, and related capital and on-going maintenance costs to accommodate the proposed level of growth, including minor sub-divisions, and identify funding sources.

d. The EIR should calculate and evaluate the potential for increased population and growth in the unincorporated areas due to increased growth from: planned expansion of urban infrastructure, changes in resource protection standards, changes in project yield reduction formulas, increased densities in redevelopment areas, any proposed Transfer of Development Rights program, and the impacts of the same, (including cumulative impacts) on resources listed in paragraph 1a. above.

2) Adequacy of Fire Protection

a. There are vast areas of semi-rural designations depicted on the draft Land Use Distribution Map and there is no policy that directs or assures that development will occur in a more concentrated pattern that would allow for efficient use of limited fire fighting resources. To the full extent that the new plan allows development to occur in remote, outlying areas, the EIR should evaluate the cost and the ability to adequately defend areas proposed for development when wildfires occur.

b. How will adequate emergency services be funded?

Ground water Dependent Areas and Reliable Sources of Water

a. California's "Water Plan, 2000" predicts a serious and growing water supply deficiency during the next 10 years, if normal precipitation is realized, and much more severe shortages in drought years. California has recently adopted legislation, (SB 221) which prohibits municipalities and counties in California from authorizing developments of 500 or more residential units unless certified that there is an adequate and permanent water supply "presently available" to serve the development. In our semi-arid region, such a policy for future development should have a much lower threshold than 500 units. The EIR should analyze and consider current water supply uncertainties, supply trends in San Diego County and determine a more appropriate, (lower) threshold for approval of new projects.

b. The EIR should study growth planned in groundwater dependant areas and consider the adequacy of existing legislation and ordinances to protect sustainable groundwater supplies and groundwater quality.

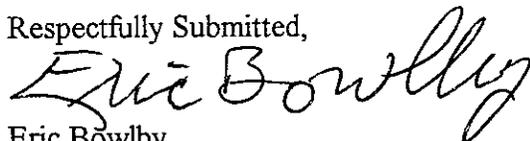
c. In light of the wide-spread drilling of deeper wells this year, (groundwater levels were dropping), and the added pressures on groundwater supplies by gaming casino expansions, we need to require water supply evaluation and confirm reliable sources for groundwater for any level of new development in groundwater dependent areas.

d. The EIR should evaluate and determine the extent (time and volume) that availability and quality of ground water will be impacted by: population increments, variability of conditions, (drought, casinos) within the region with a range of "best case" through "worst case" scenarios.

e. The EIR should evaluate the availability of resources for development on private lands that share the same groundwater basin or watershed with Reservations which have or are in the process of developing casinos, resort hotels, shopping centers and golf courses which will place intensive demands on the limited groundwater resources in the future and are creating issues of increased traffic.

f. The EIR should also address the adequacy or inadequacy of existing County Ordinances to address the increasing offsite impacts of future groundwater based development projects on Reservation lands sharing groundwater basins within San Diego County.

Respectfully Submitted,



Eric Bowlby

Sierra Club, San Diego Chapter Representative for the GP 2020 Interest Group


SIERRA CLUB, SAN DIEGO CHAPTER

San Diego and Imperial Counties
3820 Ray Street
San Diego, CA 92104-3623

Office (619) 299-1743
Conservation (619) 299-1741
Fax (619) 299-1742
Voice Mail (619) 299-1744
EBBS (619) 299-4018

December 16, 2002

Mr. Gary Pryor, Director
Mr. Ivan Holler, Chief of General Plan 2020
Dept. of Planning & Land Use
5201 Ruffin Rd., Suite B
San Diego CA 92123

RE: Notice of Preparation of County General Plan update 2020 EIR
Scope & Content Comments, Log No. 02-ZA-001

Dear Mr. Pryor and Mr. Holler:

Thank you for all your time working on this general plan update process and for consideration of the following comments.

1. **Population targets in the unincorporated areas**

a. If adopted, the population targets reflected in the draft Land Use Distribution Map will exceed the recent growth rate for the unincorporated areas. In light of the fact that the current growth in the unincorporated areas, combined with a sprawling development pattern, has resulted in numerous environmental problems such as congested roadways, air and water pollution, endangered and threatened species, loss of rural-scenic values and agricultural land, **the growth rate for these outlying areas should be reduced, not increased.**

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Page 2, Letter from Sierra Club, December 16 , 2002

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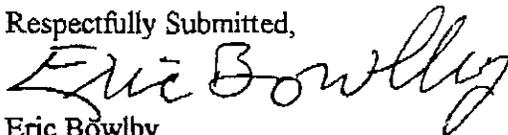
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f. The EIR should also address the adequacy or inadequacy of existing County Ordinances to address the increasing offsite impacts of future groundwater based development projects on Reservation lands sharing groundwater basins within San Diego County.

Respectfully Submitted,

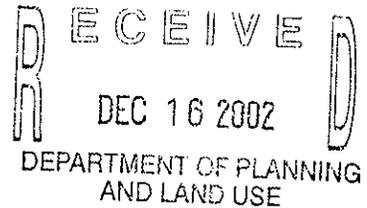


Eric Bowlby

Sierra Club, San Diego Chapter Representative for the GP 2020 Interest Group

December 12, 2002

Gary L. Pryor, Director
Department of Planning and Land Use
5201 Ruffin Road, Suite B
San Diego, CA 92123



Topic: County of San Diego General Plan Update 2020; Log No, 02-ZA-001

Dear Director Pryor:

I am near totally ignorant on this topic, and frankly our community in Alpine is just beginning to openly debate it. It seems that many people do not want a rapid and significant increase in our population. We want to preserve the rural country town character, but still allow for sensible, planned, and modest growth.

There is an infrastructure improvement need to be reviewed and addressed. This includes allowing for parks, open-space, sidewalks and pathways, and it seems existing sewer and water treatment constraints need review, funding and correction. Please do not overlook these needs. Many of us believe these are priorities ahead of more commercial and residential development.

Many people are unhappy with the concept of widening the commercial area along Alpine Boulevard, the main commercial artery through town. By this I mean increasing density and then cramming-in, so to speak, more dense housing and commercial land use. The dense housing at the intersection of South Grade Road and Alpine Boulevard is an example of sorts. These new homes are immediately adjacent to commercially zoned property intended for development by Albertson's. There should have been a buffer between the two land uses in the original planning and zoning. As it is, homeowners there are inevitably going to be hurt if the Albertson's project goes ahead. Maybe Albertson's has some sort of legal right to develop, and maybe there's even a need for a supermarket to serve this area of the East County. But face it – would you want to live immediately next door to such a major commercial development? Of course not! It doesn't pass the "gut feel test". Better planning could have prevented the kind of raucous community dissent between homeowners and developers over this project – and also in the future.

"Stretching-out" the commercial and multi-residential use along Alpine Boulevard to the east of South Grade Road and up to Willows Road seems a better way to accommodate future commercial and higher density residential needs – as long as infrastructure is extended too. That may well be a good solution to traffic too – not to bottle it up within the confines of the existing "town center" and to minimize any need to significantly widen Alpine Boulevard to the obvious detriment of its rural character. An I-8 off-ramp to Alpine Boulevard at or east of the I-8 and the South Grade Road intersection ought to be looked at as it might serve to mitigate traffic in general and to serve an extension of commercial and higher density residential land use east of town along Alpine Boulevard.

My impression is that citizens would reject Alpine becoming a transit node or hub. It also doesn't pass the "gut feel test"; e.g. who wants their house next to a supermarket. If it is proven that a transit node is necessary, it should be located well east or well west of town. No matter how you cut it, "bus stations" are highly undesirable for a variety esthetic, traffic, and social reasons. They add no value to land and they inevitably become infected sites for breeding decay.

Commercial extension along Tavern Road is inappropriate. Once outside the town center, this road is essentially residential with the occasional school and church well set back from the roadway – land uses compatible with a residential neighborhood. The only commercial use now along that road is a small, Chalet-style meat market. The Caltrans maintenance yard is essentially beyond the town boundary and in any case, the Caltrans office is a converted single-story home nestled in behind mature trees. At the recent PERB meeting a major land use change to the meat market site property for the purposes of redeveloping for a commercial/light-industrial self-storage project was unanimously rejected. The PERB Board found that such commercial development along that road is counter the vision and to all the planning guidelines for the Alpine community. The character of Tavern Road as a residential route linking residential areas to the downtown commercial center along Alpine Boulevard ought to be maintained.

Please incorporate these suggestions into County planning.

I hope the governing principle used by the County for its planning update is based on finding really good solutions to stopping "urban sprawl". With respect, to those many of us uninformed, the current plans "look" like urban sprawl – and we all ought to be seeking ways to accommodate modest, planned growth without it. Look at 20~30 year old photos of County towns east of SDSU. La Mesa and El Cajon have turned from small towns to abominations of urban sprawl, and with decay now setting-in - particularly in the latter. Santee, Lemon Grove and other towns are becoming undesirable in part for these kinds of reasons. Even Blossom Valley is starting to look "out of character" with the appearances of unplanned growth.

Please keep mitigation of "urban sprawl" foremost in the County's planning principles.

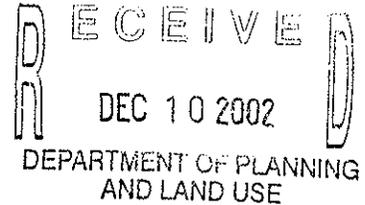


George Barnett
2194 Paseo Donito
Alpine, CA 91901

Cc: Dianne Jacob, County Supervisor

Crest View Properties

PO Box 23344
San Diego, Ca 92193



December 6, 2002

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

REFERENCE: RESPONSE TO NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT FOR THE COUNTY OF SAN DIEGO GENERAL PLAN UPDATE 2020 LOG NO. 02-ZA-001

This letter is to respond to the notice of preparation of an environmental impact report for the County of San Diego General Plan Update 2020 Log No. 02-ZA-001. This response is in reference to property in Crest as follows APN 510-010-12-00 (40 acres) and APN 509-010-51-00 (51 acres). Under current zoning subject to slope analysis, the yield for this property is estimated to total 32 units. We request that the EIR take these 32 units into consideration for future planning.

It is important to note that this property is directly adjacent the developed community of Crest so is convenient to the infrastructure for development. Development here would also help alleviate the shortage of housing.

Thank you for your consideration in this important matter.

Sincerely,



Paul Ulrich
Manager, Crest View Properties
Phone or FAX 858 459 7330

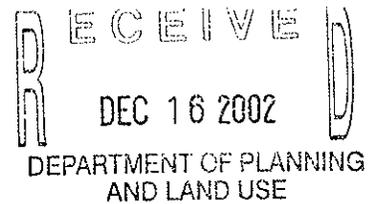
Cc Michelle Yip, Planner 1, Department of Planning and Land Use, County of San Diego, 5201 Ruffin Road, Suite B, San Diego, CA 92123-1666, MS 0650

Cc Dianne Jacob, San Diego County Supervisor, District 2, 1600 Pacific Highway, Rm 355, San Diego CA 92101

Cc Tim McMaster, County Planning Group, General Plan, PO Box 1042, Old Mountain View Road, El Cajon, CA 92021

Cc Jerry McCaw, Lance Burris, Prudential California Realty, 12857 El Camino Real, Ste N5, San Diego, CA 92130

Cc Judy Cornell, Trustee, Crest View Properties, CFS Financial, 120 Union Road, Stratham, NH 03885



Gary L. Pryor, Director
Department of Planning and Land Use
5201 Ruffin Road, Suite B
San Diego CA 92123

RE: County of San Diego General Plan Update 2020: Log No. 02-ZA-001

Dear Mr. Pryor:

We are writing because of our concern regarding the proposed General Plan Update 2020 as it effects Alpine. We are aware that the deadline is very near for comment, so we ask that this letter be accepted into the file as a FAX, with a hard copy to follow.

It has become apparent to us that it is primarily builders and land developers who are urging the passage of the General Plan Update now being considered. It is our strong belief that the community of Alpine in general does not want the increase in densities provided in the proposed plan. We ourselves moved to Alpine in 1988 from the city because we wanted to live in a country town with less density. Our contacts with other residents of Alpine indicate that this is the attitude strongly held by the majority. We are aware that some growth is inevitable, but feel it should be in areas appropriate for it rather than the general increase in densities this plan proposes. We believe that projects already approved by the County are going to increase population to the point that the community character will be severely threatened.

It is our belief that increase in population densities is appropriate in some areas of the County, particularly in the city of San Diego where redevelopment of deteriorated or aging housing should be implemented. Alpine is not among these areas.

We have lived in the San Diego metropolitan area for most of our lives, and remember well the time when there was open space between San Diego and La Mesa, as well as between La Mesa and El Cajon. At the present time, open space between El Cajon and Alpine still exists. However, the General Plan Update as now proposed would continue the eastward urban sprawl that has been the unfortunate historic pattern of the East County and bring urbanization and sharply increased population density to Alpine.

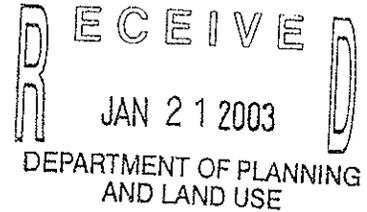
For the sake of the appealing community character Alpine now has, we ask that the proposed General Plan Update 2020 be re-thought and re-considered with the long-range good of Alpine in mind. Please don't let those who want to increase their personal incomes by continued development pressure the approval of a General Plan that would ultimately destroy this area and its character.

Thank you.

Winfield A. Dean
Winfield A. Dean
2369 Nido Aguila
Alpine CA 91901-3615

Marjorie S. Dean
Marjorie S. Dean

Cc: Supervisor Dianne Jacob



De Luca

Investments & Development

1225 East Vista Way
Vista, CA 92084
Phone (760)-940-2000 Fax (760) 940-2004

January 16, 2003

Ivan Holler
County of San Diego
Department of Planning & Land Use
5201 Ruffin Road
San Diego, Ca 92123

Re- Notice of Preparation of an Environment Impact Report if the County of San Diego
General Plan Update 2020 LOG NO 02-ZA-001

Dear Sir,

I would like to be put on record as being opposed to the 2020 plan LOG No.02-ZA-001,
as now stated.

My name is Dino A De Luca the owner of approximately 28 acres APN 129-292-36-00
located at 11146 Old Castle Road in Valley Center. I am in process of a 6 Lot
subdivision and have a great concern on what will eventually happen to my property and
how it will affect me.

I personally object to the 2020 plan and would like to be put on your mailing list. The
plan to down zone will affect me negatively and would like to be kept up to date and
notified on any future development. Your cooperation is greatly appreciated.
Thank You.

A handwritten signature in black ink, appearing to read "Dino A. De Luca". The signature is stylized and somewhat cursive, with a long horizontal stroke at the end.

Respectively,
Dino A. De Luca

Cc: Supervisor Bill Horn
1600 Pacific Highway
San Diego, Ca 92101

Cc: Hadley Johnson
129 W. Fig Street
Fallbrook, Ca 92028

December 13, 2002

Department of Planning and Land Use
EIR for GP2020
5201 Ruffin Rd Suite B
San Diego, CA 92123
Fax 858-694-3373

To Whom It May Concern:

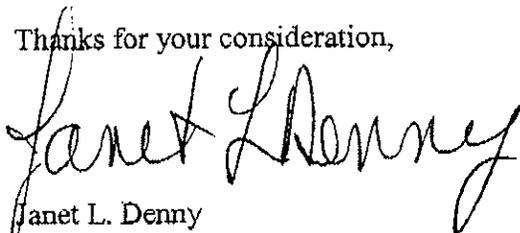
I'm writing with regard to the Environmental Impact Report for GP2020. I am a resident of Elfin Forest. I'm concerned about the disturbing flurry of developer activity in Elfin Forest and Harmony Grove as they try to rush projects through approval before GP2020 takes effect. It has been overwhelming to keep up with their plans and read / respond to their environmental impact reports.

I am concerned that this rush will defeat some of the goals of GP2020. If so much of the available land is gobbled up with tract housing, developed under exemptions from current density requirements (which they're all requesting), how much land will be left for protection under GP2020?

I also do not believe that every developer's EIR can make a fair assessment of their impact to the community, traffic, water, etc. when there are so many developer EIRs being written and reviewed simultaneously. The EIRs appear to evaluate impact based on current population and traffic numbers. If 7 or 8 EIRs are circulating within months of each other, how can they take into account each other's impact?

Please address this situation in the GP2020 EIR, specifically how it will affect new developments that are at various planning and approval stages. I would like to see a plan put into place that will curtail the frenzy.

Thanks for your consideration,



Janet L. Denny
2255 Seaquest Trail
Escondido, CA 92029
W 858-826-7547

Cc: Elfin Forest Town Council

Public Comments on
NOP of an EIR for the County of San Diego
General Plan Update 2020 Log No. 02-ZA-0001

To: DPLU, fax 1-800-407-6777

From: Carolyn Dorroh, 17235 Voorhes Lane, Ramona, CA 92065

16 December 2002

I suggest having an independent hydrology expert to analyze San Diego County's hydrology resources for projected densities of the GP Update 2020. Please include studies on the increased density effects to water shed areas like Ramona Grasslands and others.

Look closely at potential threats to ground water quality in areas where the population relies solely on well water. It makes no sense to increase density in these sensitive areas.

Study the density impacts on ground water levels in wildlife sensitive areas. There are environmentally sensitive areas where the animals must dig to expose ground water. Study how far down the wildlife can typically dig to expose ground water. In the Santa Maria Creek that runs through my yard, the animals lost the ability to expose ground water at a 39 inch level this summer. The angle of the sides is too great for them to dig any deeper. The sand immediately slides down covering the freshly dug area. They can't dig fast enough to keep the sand out. Where will they drink? A lot of these animals are listed in the Multiple Species Conservation Program.

Please study the impact on "road kills" due to an increase in density. Areas of wildlife sensitive lands should have tapered density up to it.

Study the impact of "time release" building, of large developments, on the infrastructure and environment over the usual building way. Example: Let's say that a developer wants to build 400 houses in a community that does not have the water to support its current population, nor does it have the school facilities, funds, and staff to accommodate the students of such the project, nor does it have the road ways to support the current demand, and there are no plans to improve roads for the next 30 years. Instead of allowing all 400 hundred homes to be built in the usual fashion, study the effects of allowing 10% of the homes to be build each year. This would allow both the wildlife to adapt to the depleting resources of their world and the community to find resources to accommodate current demands.

Please add me to your distribution list for future mailings.

Thank you,



Dreessen Enterprises, Ltd.
719 South We-Go Trail
Mt. Prospect, IL 60056
Phone: (847) 392-1160
Fax: (847) 749-0977

RECEIVED
JAN 06 2003
DEPARTMENT OF PLANNING
AND LAND USE

January 2, 2003

Ivan Holler
County of San Diego
Department of Planning & Land Use
5201 Ruffin Road
San Diego, CA 92123

GP 2020 Issue

RE: Notice of Preparation of an Environment Impact Report for the County of San Diego General Plan Update 2020
LOG NO. 02-ZA-001

Dear Sir:

I would like to be put on record as being opposed to the 2020 plan LOG No. 02-ZA-001, as now stated.

I, as a farmer of avocados have a great concern as to what will eventually happen to me and my property off of West Lilac Road, near Bonsall, California.

I have farmed this property since 1967. It has provided a home for a Mexican American family for the past 30 years. During this time interval I have switched to various crops, oranges, limes, grapefruit and avocados to try and make it economically feasible to maintain the property. None of this has been inexpensive.

Environmentalists do not have any economic interest in these land projects and so they can parade, yell and scream about wanting things done, but it doesn't affect them financially.

Now the avocado industry is being inundated with Mexican and Chilean fruit to compete with California fruit. At some point, much to my dismay, the land will not be profitable as farm land and will need to put in houses or loose our investment. This is the reality of the situation and the investor's dilemma.

The environmentalists are able to walk away and make big noises elsewhere without it costing them a dime.

I would like to be put on your mailing list. The plan to down zone will affect me negatively and I would like to be kept up to date on what is happening.

Thank you,

Respectively submitted,

Donald A. Dreessen DVM

Donald A. Dreessen, DVM

DAD: mld

Cc: Supervisor Bill Horn
1600 Pacific Highway
San Diego, CA 92101

George Eastwood
2451 Southern Oak Road
Ramona, California 92065

Date: 16 December 2002

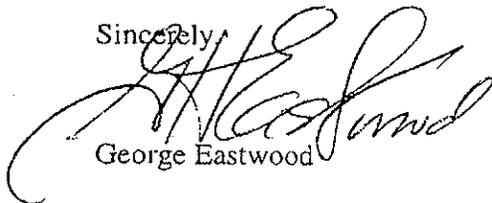
Subject: COUNTY OF SAN DIEGO GENERAL PLAN UPDATE 2020: LOG NO. 02-ZA-001

1. Request the content of the subject draft Environmental Impact Report (EIR) include:

- a) Options to minimize/control population growth in San Diego County or the unincorporated areas of San Diego County to reduce population impact on the environment.
- b) Definition and precise location of an urban limit line or lines similar to that used by the city of Portland, Oregon.
- c) Precise definition of minimum standards for infrastructure (roads/schools/water & power availability/etc) and quality of life standards (noise & air quality standards, timely access to emergency services, public parks and open space, etc) that must be in place or funded before any additional major development is started.
- d) Precise definition of minimum standards for infrastructure (road congestion/schools/water & power availability/etc) and quality of life standards (noise & air quality standards, timely access to emergency services, public parks and open space, etc) that must be in place or funded before any additional minor development that incrementally, but cumulatively, burdens current infrastructure is started.
- e) Details of the history, organization, and exact procedures used to collect and correlate all public input for GP2020 including a detailed rationale for final GP2020 decisions. A detailed analysis of how public input from various sources (DPLU staff, local planning groups, special interests groups, private citizens, etc) for each decision was correlated, weighted or used is of particular interest.
- f) Details of how GP2020 planning decisions, infrastructure and quality of life standards will be enforced including the source and amount of funding provided for enforcement.

2. Request that I be notified of all significant events/deadlines on this project. Thank you.

Sincerely,



George Eastwood

FAXED TO DPLU
16 DEC 2002
2:35 PM

LATE

Re: Preparation of Environmental impact Report for San Diego General Plan Update 2020

To Whom This May Concern:

First, I would like to sincerely thank the County for all the effort it has made to answer concerns of citizens of Valley Center and the rest of the county who have voiced their concerns regarding preservation of the beauty of San Diego. I realize that the 2020 plan reflects the input of many concerned citizens.

As a native Californian, I have been deeply disturbed by the squandering of the beauty, rural character, and native habitats in Southern California. I have lived in San Diego for more than 30 years, moving North and East each time the greed of developers has ruined a naturally beautiful area.

As a resident and homeowner in Valley Center (for 13.5 years), I am deeply concerned with the push of developers, casino owners, and greedy landowners to wreck the efforts of the 2020 committee to craft a reasonable plan for preservation of open space and development to accommodate the influx of new residents. I recently became a member of both the Valley Center Road Median Sub-Committee and the Save the Oaks Sub-Committee, because I was so disturbed by what was occurring and by what is planned in Valley Center (e.g. Woods Valley, the planned 5 lane road).

I appreciate the rational efforts to preserve open space and a wild life corridor that has come out of the 2020 planning, but am deeply troubled by efforts of certain citizens to overturn these efforts.

I would like to request consideration of the following points”

1. Impact of the proposed changes on native flora and fauna.

It is important to note that not only are animals and plants affected, but human health is severely impacted by pollution, lack of water, and breathing the fumes—all of which accompany poorly planned development without the accompanying infrastructure. Removing the large number of trees and groves affects the air we breathe, CO2 turnover, and has even more severe environmental effects.

2. Effects of clustering: I realize that this has the hope of leaving open space, but I fear that at a later date, some new decision maker will come in and say, oh, we can build out here. There is all of this space.

3. Also, I think a BUFFER zone is needed proximal to the wild life corridors.

I would like to request that when considering development, the County consider the necessary infrastructure changes that should precede or accompany (NOT FOLLOW) such actions. We all do not want to live like the people in Mira Mesa. I was always willing to commute an hour and a half in order to live in an area with Rural Character. This, even though I was contributing to the pollution due to the lack of efficient public transportation.

4. In Valley Center, there is much talk of a Cancer Cluster. When I lived in La Costa, 6 people in my condo had terminal cancer. And there are continued reports of the increased occurrence of this disease in that area. I would suggest that something is wrong with the environment in these areas, and would really like to see some consideration of the effects of uncontrolled development.

Furthermore, the infrastructure (the roads) can not take the development. Cole Grade Road has become so dangerous with the advent of the high school and the lack of adequate turn lanes (streets like Hilldale Road are particularly bad). It is impossible to turn left from Cole Grade or into Cole Grade from Hilldale. There is a need for more than just a 5 lane highway to accommodate the problems of moving around in Valley Center, if growth continues as planned. The adjacent areas are severely affected. And yet, there is consideration of a large housing project in the area of Cool Valley Road and Cole Grade which will eliminate thousands of trees (avocados and oranges) and make traffic a complete nightmare. Water prices are escalating as we have inadequate water, and the quality of life will continue to deteriorate, as we lose the rural character of this town.

While I have concentrated on Valley Center, I am concerned with development in Ramona, Lake Henshaw, San Isabel, and many other areas of the East County. It is too late to save Del Mar, Solana Beach, Cardiff, etc.

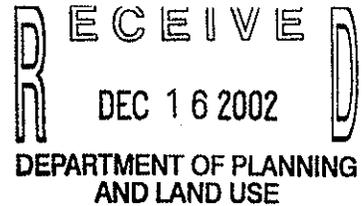
So I ask that consideration be given to our concerns, as many of us are trying to figure out where to move next, if there is no unspoiled area in San Diego County. And that is very sad.

I would like very much to continue to contribute to the life of Valley Center, and so I ask that the County look very closely at untrammled development.

Sincerely,
Ruth Epstein-Baak
13454 Hilldale Road
Valley Center, CA. 92082
(760) 749-6644

Finnamex Corp.

2910 Rainbow Glen Road
Fallbrook, CA 92028



December 16, 2002

Ivan Holler
County of San Diego
Dept of Planning & Land Use
5201 Ruffin Road
San Diego, CA 92123

Re: 2020 Plan

Dear Sir:

May I first introduce myself? I emigrated from Finland in 1974 as an agricultural specialist. I studied Horticulture, Agriculture, and Forestry in Finland, England, Switzerland, and Minnesota. I continued at National University in California obtaining a BBA in marketing, MBA in international business, and law school. I have traveled in 29 countries and have worked in 5 totally different climates with plants. Now retired, I grow ornamental landscape plants on 27 acres in Fallbrook, design landscaping, and provide full scale landscaping service. I also have expertise in replacement value calculation in all plant and environmental damage restoration. I have worked with plants 54 years of my life.

I have been advised to write to you on the above mentioned matter. Please be patient and consider the following comments and thoughts.

- A. Preservation of agricultural land as agricultural or upgraded for more efficient production.
- For use in the future, as recreational or park areas as need arises.
 - No Construction of housing on agricultural lands.
 - No Bisection for major roads or highways.
 - No open space dedications of any kind. It would deny any rightful use of the property. It would also deny the farmer his SS-security fund, and does not function as intended.
 - No down zoning, rather increasing density in portion of the land to preserve the remainder in production. Farmers need this collateral to finance production of the land.
 - When grading construction sites, all top soil should be saved for use in marginal land for production or community landscape projects. This has been in practice in Germany for 40 years.

- If roads are built through agricultural land, trees & other vegetation must be planted to prevent pollution absorption into adjacent vegetation produced for human consumption.
- Tree & shrub zones, 300' on both sides of freeways and 150' on both sides of highways, should be planted. If freeway runs in the direction of the prevailing wind, then 150' of trees and shrubs on both sides.

Reason:

Studies indicate that death from Heart and Lung Disease is double for those who live within 100 meters of a highway. In Finland, production of plants for human consumption closer than 100 meters has been banned for over 30 years.

Down zoning reduces land value. The yearbook of world agriculture for 2001 informs that there are only one and a half months of grain reserve for the global population. Due to distribution problems, tens of millions are starving. We should not be selfish in thinking that we have agricultural reserves. We must think of global needs and reserves as 100 years from now. Large amounts of farmland will be polluted out of production by imported water with minerals way beyond soils ability to buffer. We are producing beyond and outside comparative advantage. It is not feasible, though it may now be economical, to grow sugar beat in Imperial Valley and use 8 acre-feet of water for one crop, feed the foliage to cows and return nothing to soil.

B. Where to build homes.

- Instead of banning slopes from construction, it should be allowed and even encouraged. Thus freeing more farm land to be used for production of food. This will function as a reserve for the future, such as space for assisted living and youth activities.
- The marginal lands and foothills should be developed and used for farming.
- Slopes can be landscaped with additional retaining walls so less water is needed to water them than flat lands.
- Multi story buildings should be allowed on slopes for higher density and also to give sense of direction in the community and provide lower cost housing for people who in turn provide all kinds of services to "better off" residents. Restaurants and many community services could be at top and parking garages 3-4 floors underground. This would provide less impermeable surface for less runoff. Slopes could have considerably higher density than they do today. The rock material excavated could be used for concrete rock material. There is already a shortage of good concrete sand.

C. Benefits for farming.

- Highways should not bisect farmlands but should rather be built on the down wind side of farmlands to reduce pollution. All utilities should be underground.

- One cannot gain economies of scale by farming slopes for no efficiency is gained using large farming equipment. Save flat farmland for efficiency in production.
- One way roads could serve a row of single story homes if fire hydrants are adequately frequent with no curbside parking.
- Farm land would provide meaningful scenery from the slope dwellings.
- The relative need for cars needs to be reduced and public transportation provided from one population center to other to serve the less fortunate, numbers of which are increasing by birth and immigration.
- The present recycling of organic waste is a remarkable example. We use thousands of yards of compost products a year.
- Small communities on slopes and foothills could have evaporation treatment plants and water saved could irrigate the freeway and highway plantations using subsurface drip irrigation saving 75% of water compared to present practice of sprinklers (state of the world agriculture year book). We have successfully used the 27 year old Israeli system for 10 years on plants and lawns. There is no runoff.
- Aerosols: Irrigation water, using sprinkler application during wind and outside of dew points, evaporates in the air and leave in the air crystals of salt that reflect light back into the atmosphere. The crystals start immediately to evolve with nitric acid vapors formed when nitrogen oxides form from cars and other sources combined with water vapor. Nitric acid can react with sodium chloride in a droplet to form sodium nitrate and hydrochloric acid vapor. The acid vapor then reacts with any ozone that is available and destroys it in some situations-for example, If hydrocarbon vapors are present the acid vapor may instead create ozone. The nitrate that remains in the droplet can lead to harmful algal blooms as it comes down. (Murray J. Johnston and Heikki Tervahattu in science News) All treated water and ocean water contain salt makers. Because of all the above, eventually all farming will be irrigated with subsurface drip systems.

The water savings and cleaner air obtained will provide water for millions of people and healthier air to breath for all of us.

- Recommendations of reduction in beef production should be favored. The plant protein consumption by cattle has a 7:1 efficiency ratio. 7 pounds of plant protein is needed for 1 pound of red meat. Consider the water needed to grow alfalfa. 7-8 acre-feet per year. Poultry production is 3:1 and the meat is healthier, especially to the elderly. Pigs and fish raised in pounds, 1.5:1. Consider the water savings for urban populations in time of low rainfall.

D.

- All planted areas should be irrigated only by subsurface drip irrigation which operates with half the working pressure of sprinklers and lowers initial costs by reducing pipe sizes. All new lawn areas should be also irrigated with subsurface drip irrigation. This system produces no runoff.

- E. What we have here proposed would greatly conserve water, farm land, and medical costs in the long run.
- We just came back from China where we were briefed for a day by ministry of agriculture. We were also briefed by over 30 agricultural professors and researchers as to the state and plans of their agriculture. In a way they are better off seeing the U.S. agricultural situation and the infrastructure set in. Then they can see where to go and what to avoid. We will be E-mailing with them in an attempt to help them on their way to feed the nation of 1.3 billion and help them in planning their infrastructure, legal system, SS-system, and more.
 - Vocational education should be supported so that there would be people who can actually do the work with a basic education of technician. Agriculture has its few Horticulturists left but the science is dying for there are not many who have a science based practical education. Presently there are too many unemployed college graduates. Technicians get paid \$30-\$50p/h. There are many high school graduates to move into the vocational system.
 - I have reason to believe that in 50 years from now we will have to transplant wheat after being grown 3-4 weeks in a controlled environment to allow a second cropping of the same land.
 - In general, it is my position that a 2020 general plan is serving only one half a generation thus leaving our children and grandchildren out of the plan. General rules and guidelines should be for 100 years and then detail it as needed with only minor changes like every five years, thus providing some kind of expectation for developers and contractors. It would also lower the cost of planning to the applicant. Consider that miner subdivision now costs over \$30,000.00 in fees required.

In short:

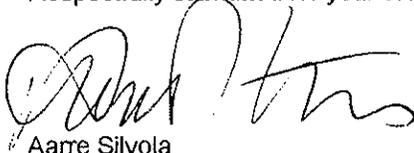
- a. Do not build housing tracts on farmland.
- b. Protect produce from traffic pollution.
- c. Do not take away farmers retirement fund by down zoning, rather support the interest in keeping the land green. Financing farming requires collateral.
- d. None of human waste should go to the ocean.
- e. It is less expensive and more efficient to form wild life habitats out of larger reserves than make an uncontrollable network of small "open space dedications" which is totally unconstitutional. 1994 Oregon Case, to take private land for public use without proper compensation.
- f. If the general plan is good, any subdivision could be and should be permitted within six months.
- g. An expansion of a school building permit processing should not take two years as it did with St.Stephen Evangelical Lutheran in Fallbrook.
- h. Mitigation of substantiated harm to nature should be allowed in form best suitable to developer or farmer. Prior subdivision mitigation should be valued equally with mitigation required by county at time of subdivision or construction.

I became involved with the Department of Planning and Land Use when submitting a subdivision application a year ago. The intent was to divide the 27 acres to my children in two parts, half to two sons, and half to three daughters. County of San Diego informed me it would need \$12,000.00 in fee deposits to accomplish that. The process is not halfway there and I have been overcharged \$3,000.00. So far the generation transfer price tag has risen to approximately \$35,000.00, even though the analyst stated that the plan has only minimal impact on the environment.

The nursery operation (agricultural activity) would continue, and ten year renewable leases have been made with the owners of Veljet Inc. and Trinity Sisters Inc. who became legal owners of the lots December 31, 2001.

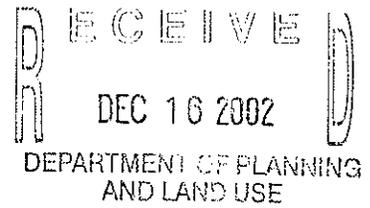
Please do not hesitate to contact me with any questions relating to the subject matter.

Respectfully submitted for your consideration,

A handwritten signature in black ink, appearing to read 'Aarre Silvola', written in a cursive style.

Aarre Silvola
Horticulturist

Copy to: Supervisor Bill Horn
1600 Pacific Highway
San Diego, CA 92101



Department of Planning and Land Use
Project Processing Counter
5201 Ruffin Road Suite B
San Diego, CA 92123-1666

December 13, 2002

Re: EIR 2020

Gentlemen:

Change to Existing Plan

The law does not require a change. If there is a change proposed, each element of the change must be specifically described (not conceptual, like the Ball Park and Stadium deals) in order to give data for judgment by the public.

People who reside in San Diego County (including the various cities and communities that make up this area) have already planned and relied upon the existing plan. Areas to work, areas to reside, use of property, future plans of all the preceding based upon the existing plan. Money invested, loans executed, trust and business plans have been made based upon the existence and use of present plan.

Comments on the referenced items are as follows:

Density reduction - by independent property appraisal, document the loss of value by each density reduction proposal on any property that is on the table to be reduced in density.

Density increase - - by independent property appraisal, document the increase of value by each density increase proposal on any property that is on the table to be increased in density.

Agriculture and Williamson Act - by independent property appraisal, document the loss of value by prohibiting the use of the Williamson Act and/or prohibiting the use of agriculture on any properties that are on the table to be affected.

Cost of each change: Specifically describe each cost and the commitment of funds to pay for each item. In the transfer of value case, identify the funds that are committed to pay for loss of value (as in condemnation, a taking is agreed to or adjudicated, AND PAID FOR AT THE TAKING.

TDR's: Document the immediate salability and identifiable value of this process by independent appraisal. Is it "legal tender", acceptable for business and commerce? If so, then will it also be accepted by the County to pay real estate taxes? If not... why not?

Items that impact existing plan and changes, if any:

Traffic, casinos, infrastructures, population, and affordable housing are some of the major impact items currently affecting the existing plan. Show how these and other are ranked in accordance with their priority to be remedied, compared to any changes in the existing plan.

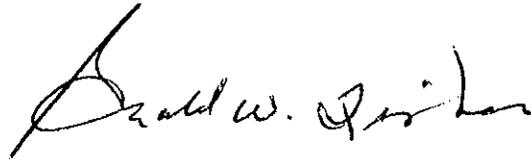
Timing and costs of impact items: On the basis that major highways such as I-5, I-15, I-8, State 76 and 78 are currently near, at, or exceed capacity, and infrastructure of the entire San Diego region is behind or below a safe and current state of repairs, state specifically the logic, and BMP, to ignore these recognized problems, and create others, or exacerbate the current ones through the chaos of changing of the existing Master Plan.

Quality of Life: Document, by independent survey, residents who reside in county areas (outside of incorporated cities) their preference to live where they do, or move, for example, to a proposed Pauma Valley Village, a proposed 7 Du/Ac environment, major highway with no safety features such as cross walks, traffic lights, current overburdened with traffic and getting worse. Has no shopping.

Affordable housing: Supply and demand in the marketplace is a recognized phenomenon throughout the world. If this concept is not recognized by the County of San Diego, document the basis that it is not so. On the basis that it is recognized by the County of San Diego, document by independent appraisal, that changing location of density, as proposed, provides marketplace values, to bring affordable housing into the county.

Governance: Document by independent secret survey, from those who have and are processing permits, the acceptability of this service. If the grading is poor, what steps will be taken with employees to upgrade the service to an acceptable level.

As of now, traffic congestion, density overcrowding, infrastructure are out-of-control. Document by independent secret survey, support from the rolls of property owners (non-government, non-public service, non-tax exempt) of each change proposed by the 2020 plan.

A handwritten signature in cursive script, reading "Gerald W. Fisher". The signature is written in black ink on a white background.

Gerald W. Fisher ♦ 23550 Hwy.76 ♦ Santa Ysabel, CA 92070 ♦ Tel/Fax:(760) 782-9208

Jane Carmichael Fitz, M.D.
Member, Alpine Planning Group
2564 Via Dieguenos
Alpine, CA 91901
(619) 445-5731
plannerjan@cox.net

December 15, 2002

Gary L. Pryor, Director
Department of Planning and Land Use
5201 Ruffin Road, Suite B
San Diego, CA 92123

Re: County of San Diego General Plan Update 2020; Log No. 02-ZA-001

Dear Director Pryor:

Please incorporate this letter into the file on the GP Update 2020. Also please keep me informed of any future action on this project.

The Alpine Community, except for developers, does not want a significant increase in our population. The majority of residents are happy to be a country/town with a population no greater than 10 to 20% more than we now have. The projects already approved by the County will easily meet that population goal and indeed, exceed it.

Our infrastructure has been totally neglected by the County and must be brought up to standards before any further building takes place. In the EIR please explain how the County intends to remedy this situation before increasing densities as it has promised..

The EIR for Goals 2020 must answer the following questions:

Why have current projects been allowed to provide inadequate or no mitigation for air quality, noise or safety along our roads with adequate pathways?

Why has the County failed to consider cumulative impacts of all the projects it has approved for our community? Explain how the cumulative impacts will be analyzed and adequately mitigated for past, future and current projects after the goals 2020 EIR is certified.

Why has the negative declaration been so liberally used, thus failing to require the safeguards for the community that an EIR mandates? That failure has resulted in significant negative air quality, traffic, noise and visual impacts to the Alpine community in spite of substantial evidence in the record (see Sun River, TM 4941; Alpine Ranch Estates West II, TM 5063, and Alpine Country Village) proving that reasonable mitigation measures would have reduced those impacts to below significance. The continual practice by DPLU to

ignore cumulative impacts through the overuse of negative declarations has resulted in a reduced quality of life, increased risks to human health and well being, and destruction of community character throughout Alpine. Explain how the County proposes to require and enforce adequate mitigation measures for future projects in Alpine and throughout the county after the EIR is approved.

Why has the County refused to provide no more than one acre in a public park for the Alpine population of over 15,000 people? How will this deficit be remedied after implementation of Goals 2020 and who will pay for the purchase, development and maintenance of adequate park space for our community?

How will you attain the stated goals of infrastructure before any upgrade in zoning? A token 'fair share' payment will not suffice.

How will you curtail building until infrastructure is improved? (Not just roads with our current LOS F at major intersections, but also schools, parks, a library, water, sewer, and sheriff and fire protection.)

How will these infrastructure up-grades be financed?

How will the County prevent clustering of lots in major projects to avoid the urbanizing effect of such crowding together of homes in our rural environment?

Some of the areas impacted by the proposed map are as follows:

Alpine Boulevard cannot handle the dense zoning proposed. Traffic is already LOS F at intersections. The feeder streets are not wide enough and have no pedestrian pathways to make walking safe. The plan requires sewer for such density, but already the Lakeside sewer district is over capacity as shown by the foul smell along Old Highway 80 west of Dunbar Lane. Michael Ott, Executive Officer of LAFCO, has written that there are many breaks and seepage in the sewer system west of Dunbar Lane. George Ream, DPW Unit Manager, has stated he is aware of sewer problems and has sent crews out to work on them. The sewer plant needs to increase its capacity markedly and repair its deficiencies before such density increase along Alpine Boulevard is allowed. How will this be accomplished and financed?

Tavern Road is another problem with the County's map. It shows an increase in density from Arnold Way to South Grade Road with two dwelling units per acre instead of the current one per acre. If this is implemented, it would require sewer extension along all of Tavern. This is in violation of the Alpine Community Plan which states under PUBLIC FACILITIES AND SERVICES, Policies and Recommendations, #11, "Boundary extensions of the Alpine Sanitation District beyond the Country Town are considered urbanizing and not consistent with the primary goals of maintaining the rural character of the community." It would also encourage commercial development along Tavern Road. Alpine has stated that we want commercial development along Alpine Boulevard to the east, not along Tavern Road.

The Community has agreed that Willows Road from west to east Willows off-ramps and Alpine Boulevard along the same area should be up-zoned to commercial. This would allow more than enough parcels for businesses and multi-family dwellings. However, the same problem exists in that area with inadequate sewer capacity in Lakeside. Are you proposing a sewer treatment plant in Alpine? The Majority of residents do not want that to happen.

Dunbar Lane has been designated by the Community as a residential area only. However several developers have repeatedly tried to get commercial projects approved in that area. Will the County uphold our wishes against commercial zoning in that area?

The County has stated that Alpine will be recommended as a transit hub, a center of mass transit, to the Board of Supervisors. The majority of residents do not want that to happen. It would turn Alpine into a city. The County has promised repeatedly that Alpine would control its own destiny. A proposal like this does not fulfill that promise. Will the County uphold its pledge?

The threat to repeal Board Policy I-78 barring package sewer treatment facilities is unconscionable. The implementation of this repeal would allow open season in Alpine and enable developers to build in many areas that are now "off-limits". This would increase Alpine's population without restraint or regard for present infrastructure deficits. All environmental impacts of such a repeal must be addressed and adequately mitigated in the goals 2020 EIR, including impacts to the rare, threatened and endangered species located on Wright's Field, which is MSCP pre-approved mitigation land.

Instead of trying to "shoehorn" increased population into areas that do not have the infrastructure to handle it (density based planning), the County should determine what resources are available and then see how much population those resources can support (resource based planning). Obviously, the highest density should be in the cities near the coast where infrastructure already exists and old structures are crying for renovation. The use of the county Water Authority Line as an arbitrary line of demarcation for increased density does not consider rural character, infrastructure and resource limitations of communities like Alpine. Here quality of life has already been significantly compromised by poor land use planning practices because those factors have been ignored.

The logical place for increased population is in areas that are already developed. If some families want to live in the country, they can buy houses here from those who want to move closer to transportation, work, or the recreation that cities can offer. Leave our countryside alone to renew our spirits and give us a break from the pressures of too much density.

We need to have urban limit lines around the densely populated cities and not allow them to sprawl out into the countryside. How will Goal 2020 implement this program?

We have not seen responsible land use planning implemented in Alpine in the past ten years or longer. It is therefore reasonable to assume that future projects would continue to

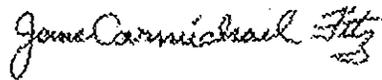
disregard Smart Growth principles. Also because the new Alpine Community Plan has been developed by the building industry's representation on the Alpine Planning Group without regard for the best interests of the majority of residents in our community. Such obvious conflicts of interest should restrain the self-serving decisions of those people who are planning only for their own benefit and not for the majority of residents in our community.

The Goals 2020 EIR must incorporate factual information and adequate mitigation measures as noted in preceding paragraphs. We must live forever with the results of poor planning practices. It is time for those practices to cease in favor of a plan that would ensure an enhanced quality of life for everyone, not just developers and their friends.

Thank you for considering these comments.

Respectfully,

Jane Carmichael Fitz MD

A handwritten signature in cursive script that reads "Jane Carmichael Fitz". The signature is written in black ink and is positioned below the typed name.

Cc: Supervisor Dianne Jacob

Letter submitted by facsimile in a timely manner. A print copy will follow in the U.S. Mail.

Janet Gilbert
20061 Sunset Oaks Drive
Ramona, California 92065

December 15, 2002

Gary Pryor, Director
Department of Planning and Land Use
5201 Ruffin Road, Suite B,
San Diego, California 92123-2960

RE: Notice of Preparation of an Environmental Impact Report for the County of San Diego General Plan Update 2020 Log No. 02-ZA-001

Dear Mr. Pryor:

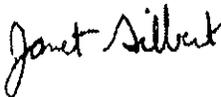
Thank you for the opportunity to provide input on the scope and content of the EIR for the General Plan 2020. A project of this size is certainly an enormous undertaking with myriad ramifications. I have the following questions and concerns that I hope the EIR will address:

1. Is Ramona considered the eastern or western portion of the county? If Ramona is considered western and, therefore, targeted for growth, how will traffic on Highways 67 and 78 be impacted as widening of these highways is not being planned by CalTrans? How will traffic impacts to the town's circulation be addressed?
2. A total analysis of water resources, the impact on existing wells, and the groundwater situation is mandatory. Who will conduct the hydrology study? Who will verify it? How will the data be produced? What are the long-term water needs and where are increased supplies coming from and at what cost to the taxpayers and users? Will the water analysis take into account the hypothesis generated by Scripps Institute of Oceanography that global warming and the subsequent climate change will result in a reduction of water in the Southwest? How will groundwater dependent areas be protected?
3. Is the density-based approach to the number of lots determined before or after constraints are factored in? Will density-based dwelling units per acre apply to the number of homes before or after the constraints map is overlaid?
4. What is the impact of increased growth on storm water runoff and non-point source pollution?
5. How will increased growth in San Diego County impact the tourist industry and the agricultural industry here?
6. How will GP2020 plan meet the creation of new jobs needed for the new residents?
7. The Notice of Preparation mentions that recreational resources will be analyzed for physical deterioration with increased use. It doesn't mention new recreational

- facilities. What types of and locations for increased recreational needs are being planned?
8. How will the 2020 plan meet the costs of new infrastructure associated with growth?
 9. How does the 2020 plan intend to control hitting target population estimates? Do target populations include counting the people living in second dwelling units? What happens to regions that exceed their target population? Is a building moratorium imposed?
 10. Does the 2020 plan include a growth rate cap to spread growth out over the duration of the plan? I would ask that the EIR include a feasibility study on setting growth rate caps and the positive and negative impacts a cap would impose.
 11. Is the GP2020 plan being developed cooperatively and concurrently with the MSCP Maps? What is the contingency plan if MSCP resource monitoring data shows negative impacts to species of special concern, endangered species, critical habitat? What takes precedence, growth or resource protection?
 12. Does GP2020 accommodate hospital/emergency care/evacuations in the event of a natural disaster or act of war?
 13. How will the County attract new personnel (doctors, nurses, etc.) to meet the needs of growth?
 14. The Notice of Preparation mentions two alternative reduced projects. What are the criteria parameters for these reduced projects?
 15. What is the projected economic growth associated with the GP2020? Is there an economic study being undertaken to study the impacts of slow/no growth for comparison with GP2020?
 16. How much is increased growth going to cost the taxpayers and how will residents' quality of life be protected with increased growth?

Again, thank you for the opportunity to express my concerns.

Sincerely,



Janet Gilbert

Larry Glavinic
PO Box 2088
Valley Center, CA 92082
760-749-6350

Ivan Holler, GP2020 Projects Manager
DPLU
5201 Ruffin Rd
San Diego, CA 92082

12-16-2002

Reference: Protest starting the EIR for GP2020

Dear Ivan,

I strongly protest starting the EIR process without a consensus on the Land Use map. A major deviation from the existing map is like changing horses in mid-stream. The existing map supports the goals of GP2020. The new map promotes sprawl in Valley Center, and only angers those being "down-zoned", and the fails to identify any circulation remedies which are contrary to the goals of GP2020. Further, unless and until there is an equity transfer mechanism which is fair, reasonable and timely. Starting the EIR process will create unusual fury, risks and delays.

To proceed with the EIR is to proceed blindly.

Respectfully,



Larry Glavinic

Cc: Gary Pryor, DPLU
Bill Horn, Supervisor 5th District

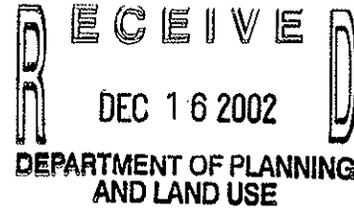
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DEC 18 2002
DEPARTMENT OF PLANNING
AND LAND USE

LATE

December 16, 2002

GRAVES ENGINEERING INC.
A California Corporation

Gary L. Pryor, Director
County of San Diego
Department of Planning & Land Use
5201 Ruffin Road, Ste B
San Diego, Ca 92123-1666



Re: County of San Diego *General Plan Update 2020* — Log No. 02-ZA-001

Dear Mr. Pryor:

This letter herein requests the County of San Diego adds to their scoping for their General Plan Update EIR the study and information regarding the telecommunication site overlay designation TC. The purpose of the overlay is to identify geographical areas which represent suitable key locations within the Regional Telecommunications Network; and to specify areas which have been determined to be acceptable locations for the operation of telecommunications transmitting/receiving facilities.

Currently, the "back country" is being developed with many antenna sites (even valley bottom sites) in close proximity to one another, on both small and large lots. It is my belief that existing telecommunication sites with potential to expand and which provide great coverage should be designated by the telecommunications overlay or similar designation.

From my attendance at planning groups and sponsor group meetings in the north, east, and south county during the past few years, it is obvious that telecommunications — particularly the County RCS system, Border Patrol radio system, FBI radio system and cell phone sites are 'here to stay'.

Once again, please develop telecommunications site overlay designations on at least rural portions of the back country.

Thank you very much. If there are questions with this letter, please call me at 858-565-9512.

GRAVES ENGINEERING INC.

A handwritten signature in black ink, appearing to read "Thomas A. Graves".

Thomas A. Graves, P.E.
Senior Engineer

December 16, 2002

Gary L. Pryor, Director
Department of Planning and Land Use
5201 Ruffin Road, Suite B
San Diego, CA 92123

Re: County of San Diego General Plan (GP) Update 2020

Dear Director Pryor:

Please incorporate this letter into the file on the GP Update 2020. Also please keep us informed of any future action on this project.

The majority of the Alpine Community, except for developers, does not want a significant increase in our population. We personally own a home in Alpine on 4 acres, of which approximately 2 acres is designated MSCP habitat in which native plant life and wildlife are prolific. We moved to this area for its low density and rural lifestyle and make the commute to San Diego for work. The majority of residents are happy to be a country/town with a population no greater than 10 to 20% more than we now have. The projects already approved by the County will easily meet that population goal and indeed, exceed it.

Our infrastructure has been totally neglected by the County and must be brought up to standards before any further building takes place. Please explain how the County intends to remedy this situation before increasing densities as is being considered.

The EIR for Goals 2020 must answer the following questions:

Why have current projects been allowed to provide inadequate or no mitigation for air quality, noise or safety along our roads with adequate pedestrian pathways?

Why has the County failed to consider cumulative impacts of all the projects it has approved for our community? Explain how the cumulative impacts will be analyzed and adequately mitigated for past, future and current projects after the Goals 2020 EIR is certified.

Why has the negative declaration been so liberally used, thus failing to require the safeguards for the community that an EIR mandates? That failure has resulted in significant negative air quality, traffic, noise and visual impacts to the Alpine community in spite of substantial evidence in the record (see Sun River, Alpine Ranch Estates West II, TM 5063, Alpine Country Village) proving that reasonable mitigation measures would have reduced those impacts to below significance. The continual practice by DPLU to ignore cumulative impacts through the overuse of negative declarations has resulted in a reduced quality of life, increased risks to human health and well being, and destruction of

community character throughout Alpine. Explain how the County proposes to require and enforce adequate mitigation measures for future projects in Alpine and throughout the county after the EIR is approved.

Why has the County refused to provide no more than one acre in a public park for the Alpine population of over 15,000 people? How will this deficit be remedied after implementation of Goals 2020 and who will pay for the purchase, development and maintenance of adequate park space for our community?

How will you attain the stated goals of infrastructure before any upgrade in zoning? A token 'fair share' payment will not suffice.

How will you curtail building until infrastructure is improved? (Not just roads with our current LOS F at major intersections, but also schools, parks, a library, water, sewer, and sheriff and fire protection.)

How will these infrastructure up-grades be financed?

Some of the areas impacted by the proposed map are as follows:

Alpine Boulevard cannot handle the dense zoning proposed. Traffic is already LOS F at intersections. The feeder streets are not wide enough and have no pedestrian pathways to make walking safe. The plan requires sewer for such density, but already the Lakeside sewer district is over capacity as shown by the foul smell along Old Highway 80 west of Dunbar Lane. The sewer plant needs to increase its capacity markedly before such density increase along Alpine Boulevard is allowed. How will this be accomplished and financed?

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The threat to repeal Board Policy I-78 barring package sewer treatment facilities is unconscionable. The implementation of this repeal would allow open season on Alpine and enable developers to build in many areas that are now "off-limits" increasing Alpine's population without restraint or regard for present infrastructure deficits. All environmental impacts of such a repeal must be addressed and adequately mitigated in the goals 2020 EIR, including impacts to the rare, threatened and endangered species located on Wright's Field, which is MSCP pre-approved mitigation land.

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extensions of the Alpine Sanitation District beyond the Country Town are considered urbanizing and not consistent with the primary goals of maintaining the rural character of the community." It would also encourage commercial development along Tavern Road. The community of Alpine has stated that we want commercial development along Alpine Boulevard to the east, not along Tavern Road.

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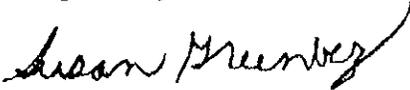
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We have not seen responsible land use planning implemented in Alpine in the past ten years or longer. It is therefore reasonable to assume that future projects would continue to disregard smart growth principles. Also because the new Alpine Community Plan has been developed by the building industry representations on the Alpine Planning Group without regard for the best interests of the majority of residents in our community. Such obvious conflicts of interest should restrain the self-serving decisions of those people who are planning only for their own benefit and not for the majority of residents in our community.

The Goals 2020 EIR must incorporate factual information and adequate mitigation measures as noted in preceding paragraphs. We must live forever with the results of inadequate planning practices and it is time for those to be replaced with broad long-range plans such as implemented by the states of Maryland and Washington which ensure an enhanced quality of life for everyone, not just developers and their associates.

Thank you for considering these comments.

Respectfully,



Susan Greenberg
2068 Balentine Dr.
Alpine, CA 91901
Phone: (619) 659-1436
Fax: (619) 659-0418
Email: greenbrq@adnc.com
Cc: Supervisor Dianne Jacob

Letter submitted via email to gary.pryor@sdcountry.ca.gov and facsimile to (858) 694-3373 in a timely manner. A copy will follow in the U.S. Mail.



530 B Street • Suite 2100 • San Diego • California 92101-4469
Telephone 619/238-1900 • Facsimile 619/235-0398 • www.procopio.com

LLP

Founded 1946

Theodore J. Griswold
Direct Dial: (619) 515-3277
E-mail: tjg@procopio.com

December 16, 2002

VIA FACSIMILE

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

Re: Comments on Notice of Preparation (NOP) Regarding Environmental
Impact Report for Proposed County of San Diego General Plan Update
2020 (Env. Review No.: Log No. 02-ZA-001)

Dear Sir/Madam:

This firm is special environmental counsel to 2022 Ranch, LLC ("2022 RANCH"), which owns property in the unincorporated area of San Diego County (the "County"). On behalf of 2022 RANCH, we have reviewed the "Notice of Preparation of an Environmental Impact Report" ("NOP") for the County's General Plan Update 2020 (the "2020 Plan"). The NOP, which is dated November 14, 2002, requests that responsible agencies, interested parties, and members of the general public provide input on the proposed content of the Draft EIR for the 2020 Plan. The comments set forth in this letter respond to the County's request for such input.

GENERAL COMMENTS – Lack of Project Description

CEQA Guidelines Section 15082(a)(1)(A) demands that the NOP include a description of the proposed project so that responsible agencies and the public can provide meaningful comments on the scope of the proposed EIR. However, the NOP for the 2020 Plan EIR fails to satisfy this fundamental prerequisite. The NOP does not define a "project" *per se*, but rather identifies certain planning objectives to be met by the project *when it is ultimately selected*. As a result, the NOP can only sketch the "project"-- the 2020 Plan --in broad strokes. For example, at page 1, the NOP describes the 2020 Plan as follows: "In general, when compared to the existing General Plan, this update will have the net effect of focusing population capacity and development in the western portions of the unincorporated area and reducing the potential for growth in the eastern areas." (NOP, at p. 1). The NOP Documentation expands on this description, but only slightly, and indicates that the 2020 Plan will do the following:

LAW OFFICES OF
PROCOPIO, CORY, HARGREAVES & SAVITCH LLP

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Page 2

- Replace the existing Resource Protection Ordinance with updated resource protection standards in the General Plan and new County ordinances;
- Adjust Community Planning Area Boundaries;
- Replace the residential lot size requirements with a density-based approach;
- Satisfy a court ruling that found invalidated the EIR for a previous General Plan Amendment (GPA 91-02) for the Central Mountain Subregion;
- Rescind outdated policies or ordinances and enact new implementing ordinances as needed;
- Restructure or repeal Williamson Act Agricultural Preserves to reflect contracted lands and recent Williamson Act modifications;
- Review, repeal, or amend Specific Plans that do not meet the updated General Plan's goals and objectives;
- Rezone as necessary to maintain consistency with the updated General Plan; and
- Review Regional Trails Network to meet the updated General Plan's goals and objectives. (NOP Doc., at p. 3)

Unfortunately, the NOP's description of the project stops there. Further, the proposed 2020 Plan has never been committed to writing. The only "Plan" document that exists is the Preliminary Regional Structure Map, which is largely devoid of detail. Indeed, the NOP admits that there really is no project to analyze at this point in time:

"The specifics of the General Plan, including a detailed land use distribution map, element revisions, Community/Subregional Plans and necessary Ordinance revisions are still being developed and a preferred project has yet to be selected by the Board of Supervisors." (NOP Doc., at p. 3)

In the absence of a preferred project, and in the absence of (1) a detailed land use distribution map, (2) proposed element revisions, (3) proposed ordinance revisions, and (4) proposed Community/Subregional Plan revisions, it is difficult to provide anything more than abstract comments on the appropriate scope of the DEIR. Worse, without a preferred project, there is no way for agencies and the public to suggest alternatives and mitigation measures -- two fundamental objectives of the scoping process. CEQA Guidelines Sec. 15082(b)(1)(A). For these reasons, the NOP is premature. The entire scoping process should be deferred until the County has formally selected a preferred project for purposes of CEQA review. Likewise, the scoping process should wait until the necessary revisions to plan elements, ordinances, etc. have been drafted and incorporated into the proposed plan update. Only then will the project (the 2020 Plan) be defined sufficiently to allow agencies and the public to submit focused comments on the scope of the DEIR. With that caveat in mind, however, we will provide specific comments to the extent we are able.

SPECIFIC COMMENTS

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A. Aesthetics: The NOP appears to limit the EIR's aesthetic impacts analysis to project effects on "regionally" significant visual resources. This is too restrictive and should be expanded to include impacts on "locally" significant visual resources as well. Additionally, the EIR should include analysis of the aesthetic impacts of increased development in the areas slated for more intense development, including the impacts of providing all necessary infrastructure for such development.

B. Air Quality: The EIR's air quality discussion should be expanded to include project-related impacts on Toxic Air Contaminant ("TAC") emissions, such as diesel exhaust particulate.

C. Hydrology and Water Quality: The premise of the 2020 Plan will dramatically change the drainage capacity of certain areas, increasing impervious surfaces and decreasing natural groundwater recharge in and around town centers. The EIR should discuss the 2020 Plan's effect on, and compliance with, the San Diego Regional Water Quality Control Board's new County-wide storm water/urban run-off permit. The permit, adopted in 2001, imposes strict controls on all manner of storm water/run-off sources and may influence land use decisions.

D. Land Use and Planning: It is unclear from the NOP whether the EIR will address potential inconsistencies between the proposed project and the land use planning documents of affected municipalities (*i.e.*, incorporated cities) and Native American reservations. If such a discussion is not currently contemplated, it should be added to the EIR's list of analytical tasks. *See*, CEQA Guidelines Sec. 15125(d). Where such plans are not available, a highest potential density/use scenario of development should be included in the EIR analysis for these areas.

E. Population and Housing: The EIR should specifically address the effect of shunting most of the urban development to the western areas of the County. Of particular importance is the effect of the proposed plan on the housing stock within the incorporated cities west of the Laguna Mountains. These cities, along with those to the northwest, will bear the brunt of the 2020 Plan's intention to tightly restrict development in east County. In short, the Plan will force the western cities to absorb most of the anticipated population growth in the County.

F. Public Services: The NOP indicates that the EIR will discuss the 2020 Plan's impacts on "governmental facilities and services that serve the unincorporated portion of the County . . ." This is too limiting. Clearly, the proposed 2020 Plan will affect public facilities and services in the incorporated cities as well. This is especially the case in those cities where high levels of population growth are expected. Such growth puts a strain on public services, schools, social services, parks and infrastructure and it appears that the proposed Plan will exacerbate this problem by restricting development severely in the eastern portion of the County's unincorporated area. All impacts of this additional burden on east communities should be analyzed in the EIR.

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Page 4

G. Transportation and Traffic: As with public services, the EIR's discussion of transportation and traffic must include indirect -- but significant -- impacts on the circulation systems of affected cities. If the EIR limits its analysis to traffic impacts on County roads and intersections, and fails to address road and intersections within the incorporated cities, it will be inadequate.

H. Cumulative Impacts: The Cumulative Impacts analysis must include a discussion of the 2020 Plan's cumulative effect on the resources of incorporated cities within the County.

I. Alternatives: The NOP's alternatives discussion is largely meaningless, as there is no "preferred project" at this point in time. Before anyone can suggest alternatives to the proposed 2020 Plan, that plan has to be defined in sufficient detail. Until that time, there is no project from which alternatives might be developed or can reasonably be commented upon.

CONCLUSION

Thank you for the opportunity to comment on the scope and content of the DEIR for the proposed 2020 Plan Update. Unfortunately, the plan is still in its formative stages and does not lend itself to adequate scoping. We request, therefore, that the scoping process be either deferred or extended until such time as a preferred project is selected and the requisite revisions to plan elements, ordinances, policies, standards, etc. have been drafted. If you have any questions regarding this comment letter, please feel free to call me.

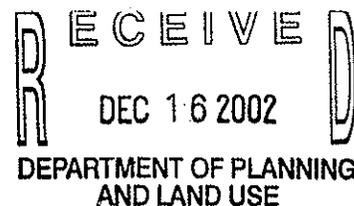
Very truly yours,



THEODORE J. GRISWOLD

TJG/se

Mildred Hock and Aaron Hock
P.O. Box 1048
Borrego Springs, CA 92004
760-767-3186
millyhock@aol.com



December 12, 2002

Department of Planning and Land Use

Re: Notice of preparation of an environmental impact report for the County of San Diego General Plan Update 2020

Log No. 02-ZA-001

We would like to submit the following comments:

1. The burning of agricultural waste has become a health problem in Borrego Springs. The smoke and stench has had a negative effect on the local population. This needs to be strenuously addressed in your Environmental Report.
2. Any activity which will conserve our water aquifer should be pursued by the County. Borrego Springs is facing a serious water shortage.
3. We encourage the County to make use of "Transfer of Development Rights" whenever possible.
4. If it is legally possible, metering and monitoring water usage on active farms should be pursued as a means of determining which farmers are not actively conserving water.
5. Areas designating "agricultural areas" should be identified on the Land Use Map, just as areas of commercial or residential use are designated.
6. Consideration should be given to a density of 1-4 in agricultural areas in order to make the land more desirable for residential subdivisions. Borrego Springs needs to minimize agriculture in order to conserve our water.

Sincerely,

A handwritten signature in cursive script that reads "Mildred + Aaron Hock".

Mildred and Aaron Hock
Borrego Springs, California

December 16, 2002

Gary L. Pryor, Director
Department of Planning and Land Use
5201 Ruffin Road, Suite B
San Diego, CA 92123

Re: County of San Diego General Plan Update 2020; Log No, 02-ZA-001

Dear Mr. Pryor:

Please incorporate this letter into the file on the GP Update 2020. Also please keep me informed of any future action on this project.

The County has failed to provide more than one acre of public parkland for the community of Alpine with its population of over 15,000 people. Will this deficit be remedied after implementation of Goals 2020 and who will pay for the purchase, development and maintenance of adequate park space for our community?

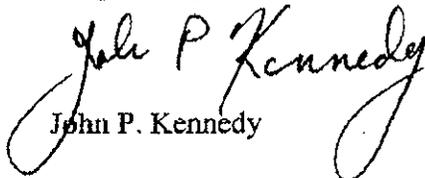
How will GP 2020 attain the stated goals of infrastructure before any upgrade in zoning?

Will the county curtail building until infrastructure is improved? (Not just roads with our current LOS F at major intersections, but also schools, parks, a library, water, sewer, and sheriff and fire protection.)

Any Goals 2020 EIR must incorporate factual information and adequate mitigation measures if it is to be a successful experience for the residents of San Diego County.

Thank you for considering these comments.

Respectfully,



John P. Kennedy

2180 Paseo Donito
Alpine, CA. 91901

cc: Supervisor Dianne Jacob

Letter submitted E-mail. A copy will follow in the U.S. Mail.

PALA REY RANCH

KATHLEEN L. MCCARTHY

Mailing Address

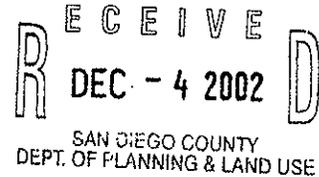
10100 SANTA MONICA BOULEVARD, SUITE 610
LOS ANGELES, CA 90067

RODNEY GUILD
Manager

JAVIER VILLANUEVA
Assistant Manager

----- *Ranch located at* -----
34160 COUSER CANYON ROAD, VALLEY CENTER, CA 92082

December 2, 2002



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

Re: Comments in Response to Notice of Preparation of the General Plan
Update 2020
Log No. 02-ZA-001

Dear Lead Agency:

Please consider these comments on behalf of the McCarthy Revocable Trust ("McCarthy Trust") during the public scoping meeting for preparation of the environmental impact report ("EIR") for the County's General Plan 2020 Update on December 5, 2002.

The McCarthy Trust is the owner of the Pala Rey Ranch ("Ranch"), consisting of approximately 590 acres south of the San Luis Rey River, east of the I-15 Freeway and west of the Pala Indian Band's reservation land in the unincorporated area of northern San Diego County ("County"). The land has been used for agricultural and ranching purposes for decades.

The Ranch is located outside of the boundaries of the San Diego County Water Authority, but within the boundaries of the San Luis Rey Municipal Water District ("District"). The District recently published a report to supplement the San Luis Rey Municipal Water District Management Plan, based upon the work of two separate water resources consultants, demonstrating the adequacy of an available water supply for a higher density of development than the current zoning would allow. In addition, the Ranch has its own independent water supply, which has been a reliable source for decades, meeting both irrigation demands, and the people who live at the Ranch.

I am writing to ask that the environmental impact report ("EIR") address the potential environmental impact on water and other environmental resources were the Ranch to be developed at a much higher density of residential and commercial development (at least triple) than allowed for under the current zoning, given the availability of a secure water supply, and the presence of a public agency which has been organized to serve the water and provide municipal-level water services.

County of San Diego
Department of Planning and Land Use
December 2, 2002
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I will be happy to ask the District to submit its report for inclusion in the EIR, or to provide additional information. If you have any questions, or would like additional information, please contact my representative: Adam Duncan (213) 817-2211.

Yours very truly,


Kathleen L. McCarthy

cc: Adam Duncan

Pryor, Gary L

From: Beth McCarthy [macbeth2@cox.net]
Sent: Sunday, December 15, 2002 7:41 PM
To: Pryor, Gary L
Subject: 2020 EIR
 Gary L. Pryor, Director

Department of Planning and Land Use

5201 Ruffin Road, Suite B

San Diego, CA 92123

Re: County of San Diego General Plan Update 2020; Log No, 02-ZA-001

Dear Director Pryor:

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The Alpine Community, except for developers, does not want a significant increase in our population. The majority of residents are happy to be a country/town with a population no greater than 10 to 20% more than we now have. The projects already approved by the County will easily meet that population goal and indeed, exceed it.

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12/16/2002

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Thank you for considering these comments.

Respectfully,

Timothy D. McCarthy

member: Alpine Community Planning Group

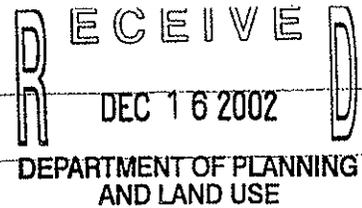
Signature

Cc: Supervisor Dianne Jacob

Letter submitted by facsimile in a timely manner. A copy will follow in the U.S. Mail.

12/16/2002

12/11/02

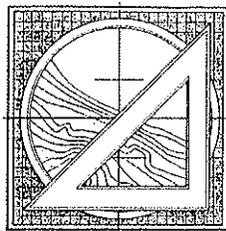


BETTY MOSS
37596 TIERRA ESTRELLA
BOULEVARD, CA. 91905
APN# 658-080-51-00

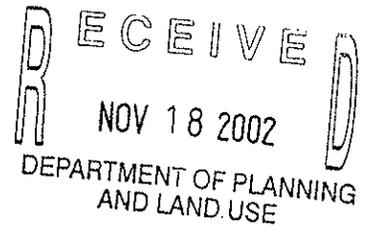
I AM WRITING IN REGARDS TO
YOUR GENERAL PLAN UPDATE 2020
LOG# 02-2A-001. I BELIEVE
PARCELS SHOULD BE AN 80 ACRE
MINIMUM. BECAUSE OF OUR
WATER TABLE, I DON'T THINK
PARCELS SHOULD BE SMALLER
THAN 80 ACRES., MY OAKS AND
RED SHANK ARE DYING. MY WATER
IS STARTING TO GET SOME SAND
WHICH IS TELLING ME MAYBE MY
WELL IS LOW.

ALSO PEOPLE TRY TO SHOOT ON
SMALL PARCELS AND THAT IS A
DANGER TO PEOPLE AND
LIVESTOCK

THANK YOU
Betty Moss



NCCE & LSA



November 15, 2002

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

Re: Notice of Preparation EIR GP2020
Log No. 02-ZA-001

Your Notice of Preparation states,..”this update will have the net effect of focusing population capacity and development in the western portions of the unincorporated area and reducing the potential for growth in the eastern areas.”

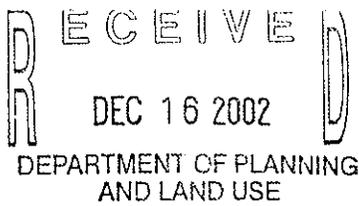
We are concerned that focusing density increases in the west will provide economic rewards (development yield) to property owners in the west at the expense of owners in the east (loss of yield and development rights). The need to address this issue has been articulated numerous times at Planning Commission, Interest Group and Board of Supervisors hearings. A well thought out “Equity Mechanism” to make property owners whole seems to be essential to the process and thus a necessary part of the CEQA review and EIR.

We request that “Equity Mechanism” be specifically included in the Notice of Preparation and in the subsequent EIR.

Very Truly Yours,

David A Nilson
President 2002/2003

cc: NCCE & LSA Membership
SOLV (Brooks Cavanagh)
SD County Farm Bureau (Eric Larson)



December 13, 2002

Vivian D. Osborn
17279 Voorhes Ln.
Ramona, CA 92065
(760)789-2872

DPLU

5201 Ruffin Rd., Suite B
San Diego, CA 92123

FAX: 1-800-407-6777 (2) Hard Copy to Follow via US Mail

PROJECT NAME: COUNTY OF SAN DIEGO GENERAL PLAN UPDATE 202

LEAD AGENCY: COUNTY OF SAN DIEGO, DEPT. OF PLANNING & LAND USE

ENV. REVIEW NUMBER: LOG NO. 02-ZA-001

Following are comments to be submitted to the Lead Agency for response and inclusion within the Review of the above referenced document. I request to be notified on any future action taken on this project.

RE: Hydrology and Water Quality

Attention to Watershed that directly affects Sutherland Dam, San Vicente Reservoir and Lake Hodges should be specific as to the Ramona Watershed that is part of the original Cleveland National Forest, created for the purpose of watershed for San Diego.

1. Address The Ramona Plan Area(RPA) watershed is a prime area of Groundwater Recharge and as a significant area of watershed within San Diego County in general.
2. Address specifically within the Environmental Impact Report(EIR), the possible adverse affects from upland pollution caused by increased density based planning within the Ramona Plan Area and the San Diego County region.
3. Request that the Dept. of Planning and Land use an **independent, specialized** 'consulting firm' to conduct a comprehensive Hydrological Study of the entire San Diego County
4. Determine the affects of the current population on the groundwater resources within the San Diego County watershed areas.
5. Project the affects of 'density/population' planning on the groundwater resources as projected by the Working Draft 2020 General Plan Map.

CULTURAL RESOURCES:

1. Identify Cultural Resources that are more than of 'Regional Significance'.
For example. The discovery this year of a 2000 year old Kumyi Indian Village, intact, within the Ramona Grassland, (RPA) that is of international importance.

pg 2

ALTERNATIVES:

1. The Reduced Project Alternatives, using Resource Planning, must reconfigure and reduce development density or intensity to reduce impacts associated with environmental considerations which are particularly sensitive to density and intensity considerations including but not limited to air quality, biology, population and housing, public services and utilities and transportation and traffic

Respectfully submitted,

A handwritten signature in cursive script that reads "Vivian D. Osborn".

Vivian D. Osborn

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

Date: December 16, 2002

Attn: Ivan Holler
Re: Recommendations for GP 2020 Environmental Impact Report

Dear Mr. Holler:

Thank you very much for your efforts to allow for the public to give input into the "Scope of Work" for the Environmental Impact Report on General Plan 2020.

As you know, the development and property owner interests on the Interest Group have for nearly one year maintained that the best way to approach the General Plan update is to use the existing General Plan format and Regional Categories; fix the existing elements of the General Plan to make them consistent and legally defensible; then resume the update of the existing community plans two or three at a time with the more "sensitive" areas of the County (such as Alpine and Ramona) being given the first priority. This was presented to the Interest Group in the form of a proposal we labeled "The Ten-Step Approach" and is the primary reason that six of us voted AGAINST the adoption of the new Regional Categories.

The main reason for our position on this matter is due to our concerns regarding a potential legal challenge to the current application which could conceivably result in the entire County being placed in a development moratorium (as in the Ag-20 and Central Mountain General Plan Updates). We feel that since such a "moratorium" would not only devastate our businesses but cripple the County's ability to provide critically needed housing. It would be better to only expose one or two planning areas at a time to minimize the impacts of such a moratorium.

Our concerns, have been heightened due the adoption of new "state laws" such as Environmental Justice and Assembly Bill 2292, which could create many more compliance laws for new General Plan updates and, thus, more potential for legal challenge.

We ask that your staff thoroughly research and seek state guidance to assure that every possible step is taken to comply with these new state regulations.

One other item which we think bears close scrutiny is the examination of the "Executive Summary" of the Department of Planning and Land Use's Analysis of the Rural Heritage and Watershed Initiative (RHWI) which was sent to the Board of Supervisors in April, 1998 (see attached). Since there are many similarities between the development patterns proposed by the RHWI and the "Structure Map" for GP 2020, we feel that your staff should include all of the items which were identified as an "impact" in that analysis as a part of GP 2020's Environmental Impact Report.

We feel that the RHWI issues, if not addressed, could form a basis by which SOFAR, or other litigious groups, might wish to challenge General Plan 2020, especially since these were issues identified by the same staff preparing the Environmental Impact Report for GP 2020.

In reviewing this summary, consider the following:

1. The Rural Heritage and Watershed Initiative (RHWI) affected 578,000 acres (which included public lands). The County consists of 2,726,975 acres of which General Plan 2020 has jurisdiction over approximately 690,000 acres

(excluding public lands and incorporated areas). Of that number, it appears that more than 450,000 acres are east of the CWA line and proposed for severe density reductions.

2. The RHWI proposed reducing lands in rural areas to 1 dwelling unit per 40 or 80 acres. General Plan 2020 proposes 1 dwelling unit per 80 acres and 160 acres in rural development areas east of the CWA line.

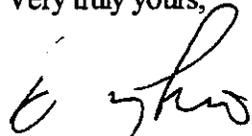
3. The RHWI proposed a shift of density in the rural areas by 54,133 d/u's to be disbursed in Urban areas in BOTH the County and the various incorporated cities. GP 2020 will shift MORE density from Rural Areas to Urban Areas due to lower density recommendations than the RHWI.

4. In addition to the "rural to urban" switch, GP 2020 proposes a reduction of the overall development buildout in the County by 60,000 units, making proposed impacts on the cities even greater than predicted in the County's RHWI analysis.

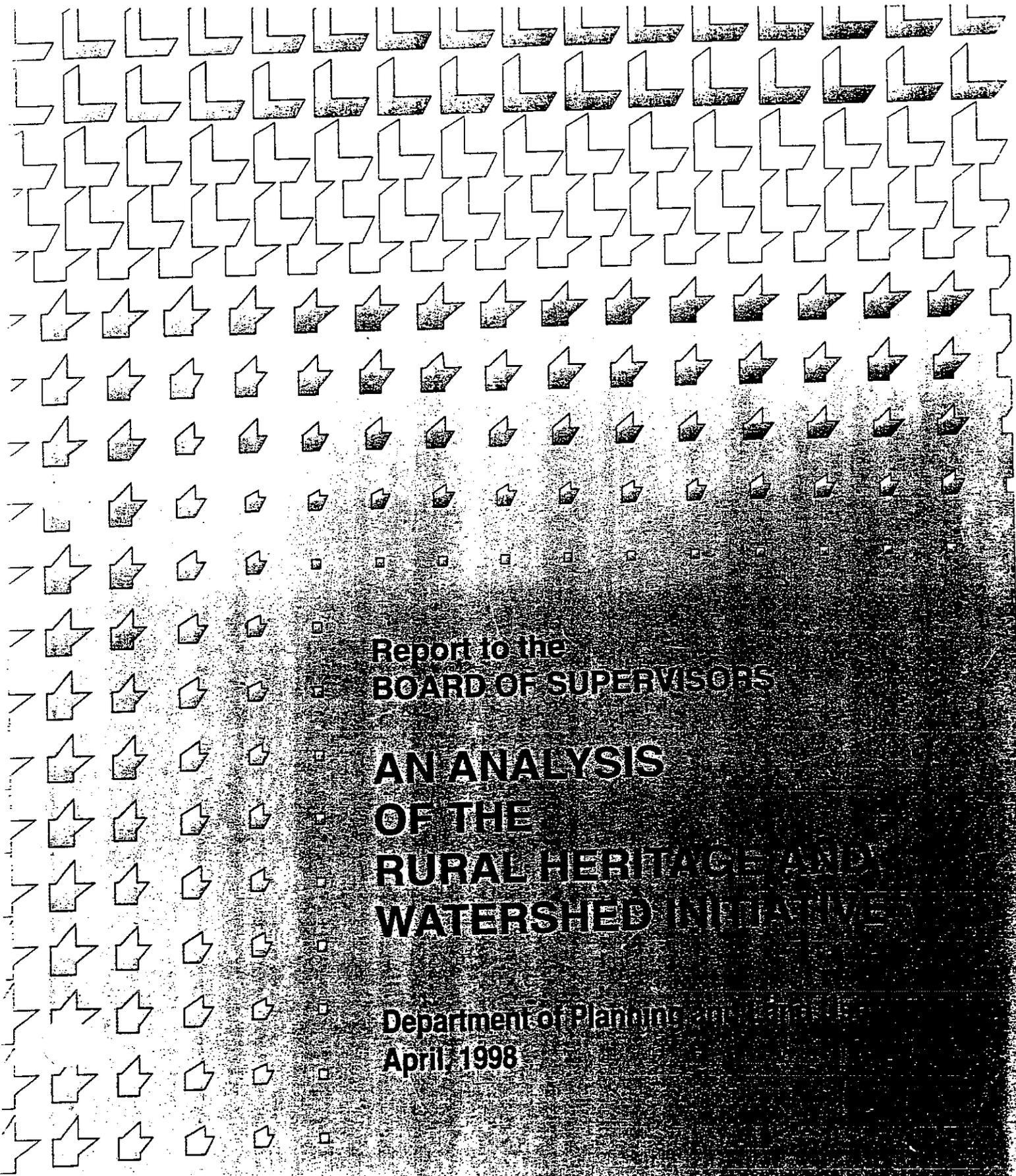
We therefore recommend that each and every one of the items of the Executive Summary of the RHWI be added to the "scope" of the Environmental Impact Report for GP 2020.

We thank you for the opportunity to give you this input and would be glad to answer any questions you might have on this matter.

Very truly yours,


Gary K. Piro
Piro Engineering


Thure Stedt
TRS Consultants



Report to the
BOARD OF SUPERVISORS

**AN ANALYSIS
OF THE
RURAL HERITAGE AND
WATERSHED INITIATIVE**

Department of Planning and Land Use
April, 1998

EXECUTIVE SUMMARY

If the Initiative is approved by the voters, it would relocate, rather than prevent, population growth. The general effect of the Initiative is to shift the location of impacts of growth rather than to avoid impacts. Also, since the measure only constrains parcel sizes, not land uses on the parcels, it offers no assurances that any environmental resources will be protected. The Initiative imposes 40 and 80 acre minimum parcel sizes on 578,135 acres scattered around the unincorporated area. The specific affected sites are based on General Plan categories established in the 1970s before advanced mapping techniques became available. As a result, the impacted land varies in actual sensitivity, including many areas that are not environmentally sensitive.

The following impacts associated with the Rural Heritage and Watershed Initiative were identified in this analysis:

Multiple Species Conservation Program (MSCP) Plan	High priority land for habitat value has been mapped and defined as "pre-approved" habitat core areas. <u>However, 60 percent of the pre-approved habitat core areas are not protected by the Initiative, so growth pressure on those sensitive lands will be intensified.</u>
Watersheds	Shifts in population growth will have both beneficial and adverse effects on San Diego County watersheds. Adverse impacts will be seen in watershed areas in which population increases, while watersheds receiving less growth will be improved.
Groundwater	Groundwater resources are already protected from depletion by residential development by the San Diego County Groundwater Ordinance. The proportion of the region's population utilizing groundwater will decrease due to lot size restrictions. The relocated population will mostly utilize imported water rather than groundwater, thus adding to the regional need for new sources of drinking water.
Traffic	Traffic will be shifted from outlying area roads onto freeways in urban areas, especially onto Interstate 15 (I-15). There will be added pressure to move commuters out of automobiles as urban congestion increases.
Air Quality	Air quality is likely to improve slightly due to shorter trip lengths due to population shift into urban areas. Some urban intersections and freeways will have increased levels of carbon monoxide due to longer wait times and stop-and-go traffic unless future vehicles burn fuel more efficiently.

Population Shifts A reduction in the number of dwelling units accommodated in community and subregional plans by 54,133 units will constrain the market and add pressure on cities to upzone their neighborhoods. Urban areas can expect a greater rate and intensity of development as market pressure encourages buildout at full or increased density.

Agriculture Coastal agriculture is a significant component of the region's \$4 billion commercial value. Those operations, primarily located in cities and the more coastal areas of the unincorporated County, will be subjected to increased growth pressures due to continued demand for residential housing and limited vacant land developable within the cities and County. Further, it places the most economically viable agricultural uses (in incorporated cities) in peril by escalating land costs. Initiative-affected areas not suitable for large-scale agricultural uses will remain unused, and private property owners will be severely limited in establishing agricultural uses due to the large parcel sizes.

Fiscal Impacts Individual property owners in affected areas will be hardest hit due to reduced land values due to loss of development potential for 54,133 dwelling units which will have a negative impact on mortgage funds. The primary fiscal effect will be the need to shift public funds, especially infrastructure improvements, from the rural areas to the urban areas to accommodate higher population growth pressure in those areas. The added growth pressure in the urban parts of the County will tend to refocus spending away from rural areas.

Public Services and Facilities Supply of imported water will be further constrained by population growth in urban areas. In the affected areas, larger parcel sizes increase costs for sewer and water districts that contain land affected by the Initiative. Since the change in anticipated service demand has not been coordinated with districts' service capabilities, some districts (especially districts that had planned for agricultural water users in these areas) may have to raise water rates due to lower-than-anticipated demand. Rural fire and school districts will have reduced revenue to expand and upgrade their present systems, but the reduced amount of development may reduce the spread of fire.

Large parcel sizes will make siting of elementary schools in rural areas more difficult since a supply of 40 acre parcels may not allow sufficient availability of smaller sites for the school needs.

To serve the added urban population, finding new school sites in the built-up city areas will prove an even greater challenge.

General
Plan 2020

The Initiative circumvents the planning process and eliminates the ability of community planning and sponsor groups and the public to evaluate and determine land use patterns. Land use categories that were set in 1978 would be locked in until the year 2028. Passage of the Initiative could also result in budget impacts on General Plan 2020 as the requirements of the Initiative would have to be incorporated into the process.

Implementation
Cost

Passage of the Initiative would necessitate subsequent General Plan and Zoning Ordinance amendments and rezones, all of which will be subject to the California Environmental Quality Act. The estimated cost is \$1 million.

Other Topics

This report also examined impacts on ecotourism, the Urban Limit Line, the Forest Conservation Initiative (FCI), and community/subregional plans, and examined reports on costs of sprawl, as directed by the Board of Supervisors. The general findings are that the Initiative is inconsistent with existing plans and programs because its broad-brush approach does not take into account existing plans and projects.

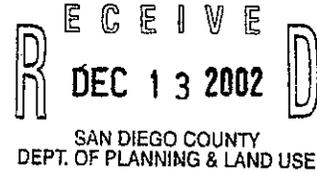
CONCLUSION

The Initiative would create a number of effects on land use. It will not, however, have an effect on population growth, which is a factor of in-migration and births. The existence of the Initiative will neither prevent people from migrating to San Diego County, nor prevent people who are here from having families. The effect of the Initiative will only be to redirect that growth within the region. Land effectively taken out of the marketplace by the Initiative will be redirected to other locations within the County.

16887 Skyline Truck Trail
Jamul, CA 91935

December 12, 2002

COUNTY OF SAN DIEGO
Department of Planning & Land Use
5201 Ruffin Road, Suite B (O650)
San Diego, CA 92123-1666



Subject: COUNTY OR SAN DIEGO GENERAL PLAN 2020 LOG NO. 02-ZA-001

To Whom It May Concern:

In response to the NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT FOR THE COUNTY OF SAN DIEGO GENERAL PLAN UPDATE 2020 LOG NO.02-ZA-001.

Two years ago we purchased 40 acres on the Skyline Truck Trail in Jamul (East County), and based on the existing General Plan are in the process of sub-dividing it into 4 lots. The previous owners of the property started this project 12 years ago at which time they established tentative lot lines, put in the roads, did the perc tests, drilled a well and filed a TPM, however, they were unable to complete the project when their partnership dissolved. Our plan is to build a retirement home on 2 of the lots for each of us and to keep the other 2 lots in reserve to leave to our children or to sell should we need money to supplement our income or pay for a catastrophic illness or some other unknown emergency.

The current status is, we reside on the property in a mobile home, the property has a good well, it has been surveyed both on the ground and from the air, it has been inspected by biologists and deemed "not sensitive from a biological perspective and well suited for development", soil tests have been made, school fees have been paid and we are in the process of sub-dividing the property.

With the exception of one large parcel of land to the west of our land we are surrounded by neighbors who live on lots of varying sizes from 2 acres and up and after spending hundreds of thousands of dollars to purchase the property and tens of thousands on civil engineering services and county fees it is not fair that our property is being considered for downsizing to one residence on 40 acres just because the county wants to create areas of high density housing some where else.

At a meeting recently when we asked some of the county planners why the county was considering downsizing land in East County we were told that the state of California has requested a plan of future growth, when we asked what was wrong with the current General Plan we were told that the estimated growth numbers from 1979 were too high and that the growth our area had not been as high as originally predicted so revised estimates are needed to plan future infrastructure and utilities.

When we asked the planners "if the infrastructure and utilities were sufficient to support the estimated growth in 1979 and the growth didn't occur why wouldn't the same infrastructure and utilities be sufficient today"? The answer we got was a change of the subject, the planners answered by telling us "that the county planners felt that if the owners of the remaining larger parcels of land hadn't been sub-divided them by now they probably weren't going to".

When we explained to the planners that many of people bought large parcels of land when they were young and that their plan might just be to sub-divide the land when they retired so they will have something to fallback on, to sell to should they need money to supplement their retirement or to be able to give a piece of land to their children so they could live near by, so the county shouldn't be making assumptions that just because the land hasn't been sub-divided by now that it wasn't going to be sub-divided in the future.

Another planner's answer to this was that the large parcels of land might be a threat to the environment and are biologically sensitive. When we mentioned to that planner that Cleveland National Forest with hundred of thousands of acres borders the land she was talking about she just shrugged her shoulders turned and walked away.

Our input on the scope and content of the Environmental Impact Report is that there is nothing wrong with the current General Plan therefore NO ENVIRONMENTAL IMPACT REPORT is needed.

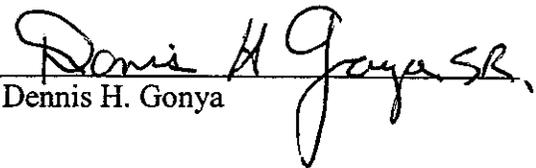
It is also our opinion that if the county wants to create areas of high density housing that's fine but you do not need to downsize the land in the rural areas to "reduce the potential for growth" in the rural areas to achieve this.

It is not fair, it is not right and it is probably not legal for you take away from us rural landowners what we have worked all our lives to acquire.

Sincerely,



Joseph C. Przeki



Dennis H. Gonya

APN: 599-051-04

Address: 16887 Skyline Truck Trail, Jamul, CA, 91935

December 12, 2002

Ivan Holler
County of San Diego
Dept. of Planning and Land Use
5201 Ruffin Road
San Diego, CA
92123

RECEIVED
DEC 16 2002
DEPARTMENT OF PLANNING
AND LAND USE

RE: County of San Diego General Plan Update 2020
Log No. 02-ZA-001

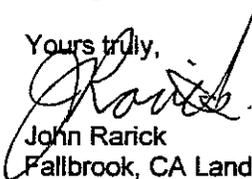
Dear Mr. Holler:

In brief summary, I ask the Planning Commission *not* to adopt revisions to the San Diego General Plan that adversely affect small, family farms. I further ask the Commission *not* to adopt provisions or restrictions that alter existing projects and the regulations under which those projects were initiated.

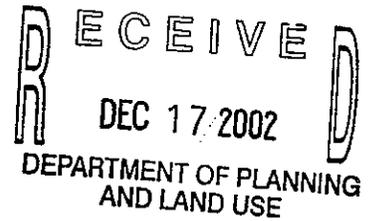
For over thirty years, I have been part of the agricultural community in Fallbrook and surrounding areas. I would like to continue in this endeavor and am now planning to redevelop an old grove with a new crop. This endeavor requires significant capital and the land will serve as collateral for potential loans.

Small, family farms help perpetuate a diversified community enriched by locally produced fruits and vegetables. Their access to capital and very own viability is based upon market conditions, which are dependent upon land values. Consequently, I ask the Commission *not* to alter the zoning of the General Plan.

Yours truly,


John Rarick
Fallbrook, CA Landowner
Farmer, President
Peak Harvest Foods
749A Portola Street
SF, CA
94129-1127

cc Supervisor Bill Horn



Paul Rohal
2172 John Dewitt Place
Alpine, CA 91901
December 16, 2002

Gary Pryor
Director
DPLU
5201 Ruffin Road, Suite B
San Diego, CA 92123

Re: Log No. 02-ZA-001 2020 General Plan Update

Dear Mr. Pryor:

I am a newly elected member of the Alpine Planning Group. Prior to my election, I talked to probably no less than 200 Alpine residents about the future of our community. The following is a summary of those discussions as they relate to the EIR for Goals 2020.

Air Quality Everyone is extremely concerned about Alpine's air quality. Not only are we directly impacted by growth in the immediate area, but, unfortunately, we are also impacted by growth to the west of us. We already have some of the poorest air quality conditions in the county and to allow it to get any worse would be criminal. We have every reason to believe that the health of our children and elderly depends on sensible land use and planning.

Community Character Almost all of the Alpine residents I spoke to clearly stated that they moved to Alpine to get away from the dense urban areas. They definitely want to keep Alpine a small town with its rural character. Not one person I spoke to had moved to Alpine because they heard there might be an Albertsons or a Vons strip mall 'coming soon'. Our rural community character is an asset we cannot allow to be ruined. Once it is lost, it will be gone forever. Only sound land use and planning practices dedicated to maintaining the rural environment will ensure the county that there will always be an Alpine as we know it today.

Infrastructure Many residents complained about the overall condition of the Alpine infrastructure, namely the roads and walkways. Their concern is growth currently being allowed by the county is done without any improvements to the infrastructure. We have areas in Alpine that the county has allowed to be developed without a secondary access in case of wildfires or other disasters. Our children cannot walk to school, because of a lack of pathways and/or sidewalks. Developers being allowed to continue populating open land without mitigation necessary to maintain the infrastructure must be halted immediately.

Parks A number of residents stated they would like to have a community swimming pool with picnic shelters and basketball courts, etc. They feel there is little for their children to do in the way of sports, if their children are not involved in baseball or soccer. With the taxes we pay, we should be able to have at least one large park and a number of neighborhood parks to meet the 2020 Update community recreational needs.

Cumulative Effects Alpine residents feel that they should not have to suffer the consequences because of poor land use planning from other cities within the county. Goals 2020 will increase the Alpine's building density to the extent that the population will swell by 66% in the out years. Meanwhile San Diego City has more than their fair share of neighborhoods that need redevelopment, but their city council feels that it is more important to build ballparks and hotels before providing their citizens with adequate housing. We find it difficult to rationalize why more is not being done by other cities in the county who already have the infrastructure in place to meet their own growth induced requirements. The cumulative effects on Alpine are excessive and unfair to our residents.

Please insure this letter is included in the General Plan Update 2020 file. In addition, I would to be kept informed of issues and scheduled milestones of this project.

Respectfully,



Paul Rohal

TO: Jason Giffen, Gary Pryor, Ivan Holler, Curt Gonzales
FROM: Judith Silverman
RE: Notice of Preparation of Documentation
for Log #02ZA-001 (GP2020) (fax has 5 pages)
DATE: December 16, 2002

This memo is in response to your request for comments. Since I have been out of the state of California for three weeks, this is the first time I have been advised of this Notice of Preparation of Documentation. So here are my comments.

Issues that need to be analyzed and resolved more completely relative to the GP2020 proposed for Valley Center are:

1. High Groundwater in the Central Valley Basin (0 to 5 feet)
2. Gasoline plume contamination of groundwater with MTBEs benzene, etc. in area proposed for Country Town.
3. Enforcement of Board Policy I-132 having to do with hazardous materials assessment of soils formerly used for agriculture and now proposed for development.

High Groundwater in Valley Center Basin:

The County of San Diego has not addressed the issue of the high groundwater in Valley Center in the area of the two proposed Country Towns. The groundwater in this area is usually between 0 to 5 feet in the winter months. (See Hydrological Study of the Valley Center Basin Contract No. 80062) Figure No. 9 (Groundwater Depth Zones, Winter 1998)

This map (figure #9) clearly shows that most of the area in the proposed Country Towns has groundwater between 0-5 feet.

Sewers do not pump out groundwater, they only "clean up" the toilet and grey water resulting from additional development. After this water is processed some of it is slated for watering a golf course that is in the 0-5 groundwater area, thus the additional development and its resultant "cleaned up" water will raise the already high groundwater levels. This will result in flooding and potential septic problems for surrounding residents.

What are you going to do to eliminate the potential for flooding that will occur in the areas of this new proposed development, and the potential for adversely effecting

Comments on GP2020Judith Silverman

the surrounding properties' septic systems because of the ill-planned new development which will adversely contribute to the high groundwater. Currently 94% of the recharging of the groundwater in this area of Valley Center occurs from irrigation of surrounding crops and average rainfall.

What provision has been made to funnel rainfall away from the new proposed Country Towns and their resultant new development. Historically, the rainwater rushes down Valley Center Road and floods the Southern Country Town. The culverts in the Northern Country Town also have overflowed. What type of storm drains are being proposed to prevent flooding in these proposed Country Towns and where will the rainfall runoff be directed?

If the County of San Diego did some planning and engineered some type of storm drains to funnel this additional rainwater away from the Center of town then perhaps the increased rise in groundwater (that has been modeled in Figure 26 --at Full Buildout --Winter) would not have to occur.

If the County recognizes that this increased buildout will raise the groundwater in areas modeled in Figure 26, then they know in advance that flooding and impacts on current septic systems can occur. Therefore, they have an obligation to engineer sufficient flood control storm drains to prevent this injurious scenario from occurring to current and future Valley Center residents and businesses.

GASOLINE PLUME CONTAMINATING GROUNDWATER:

At the intersection of Valley Center Road and Cole Grade Road there is a gasoline plume that has contaminated the groundwater with MTBEs, benzene and a host of other chemicals. (see attached list of chemicals in groundwater samples)

It appears that this intersection is the proximate location of the proposed Northern Country Town. It seems advisable to clean this plume of contaminated chemicals up before proposing to build apartments, condominiums and shopping centers at this location.

The gasoline plume first discovered in 1999 and its resultant contamination is moving and spreading out according to the file information. There has been

Comments on GP2020Judith Silverman

no cleanup to date and it seems the County has a responsibility to take this toxic contamination into consideration when considering the location for a Northern Country Town.

The Department of Environmental Health File number is H05184-003. A review of this file should occur and the environmental impacts of this underground gasoline spill should be addressed in the GP2020 report.

The spill is at 10 feet now because the groundwater is low because of the drought. Rainfall in the area will raise the contamination to 0-5 feet in this area of Valley Center.

No clean up has occurred to date of this gasoline plume that is moving and spreading out in the area of the Northern Country Town. (See attached report of chemicals detected in groundwater.)

The County of San Diego should have this underground spill cleaned up before proposing to build over it.

Enforcement of Policy I-132 on Soil Sampling:

Since Valley Center has been an agricultural area for over 50 years there should be some enforcement teeth put into the requirement that parcels historically utilized for agricultural operations proposed for development should have a soil sampling done in order to identify the presence/absence of hazardous materials and therefore be able to identify remediation measures to be implemented prior to development of the project site. This information should be made readily available to the public.

Information about which chemicals have been applied to parcels in Valley Center is readily available from the County Agricultural Department. This information should be used to guide the testing for hazardous materials. This is an important safeguard to the health of future buyers of these properties and the information on the testing should be made available to the general public and computerized for convenience and access purposes. Currently it appears questionable that the testing is taking place, with difficult access to the relevant documents; and there is no penalty for this lack of enforcement.

TABLE 7
HISTORICAL GROUNDWATER SAMPLE ANALYTICAL RESULTS

Samples collected at 29200 Valley Center Road, Valley Center, CA
by Environmental Business Solutions, Inc.
on December 20, 2000, June 20, 2001, and January 29, 2002

Sample Number	Date	TPHg (ug/L)	Benzene (ug/L)	Toluene (ug/L)	Ethyl-benzene (ug/L)	Total Xylenes (ug/L)	MTBE (ug/L)	ETBE (ug/L)	TAME (ug/L)	TBA (ug/L)
MW1	12/00	<500	NA	NA	NA	NA	NA	NA	NA	NA
	6/01	<500	<0.5	<0.5	<0.5	<1.5	<1	<1	<1	<5
	1/02	<500	<0.5	<0.5	<0.5	<1.5	<1	<1	<1	<5
MW2	12/00	38,000	900	5,400	1,000	6,200	340,000	<400	800	80,000
	6/01	NS	NS	NS	NS	NS	NS	NS	NS	NS
	1/02	NS	NS	NS	NS	NS	NS	NS	NS	NS
MW3	12/00	<500	NA	NA	NA	NA	NA	NA	NA	NA
	6/01	<500	<0.5	<0.5	<0.5	<1.5	216,656	45	388	4,816
	1/02	580	2.7	1.6	4.8	9.3	440,000	51	<1	<5
MW4	12/00	4,400	<100	250	<100	450	24,000	<100	<100	9,400
	6/01	<500	15	<0.5	4	<1.5	7,026	2	13	695
	1/02	<500	15	<0.5	1.7	2.3	8,100	<1	30	<5
MW5	12/00	7,500	980	610	220	900	1,300,300	<100	2,300	260,000
	6/01	2,600	1,768	96	247	346	858,676	288	1,838	42,427
	1/02	4,100	620	130	<100	280	410,000	<100	830	<500
MW6	1/02	<500	24	41	<10	47	7,500	<10	<10	1,500
MW7	1/02	<500	<10	<10	<10	<20	25	<10	<10	<50

TABLE 7
HISTORICAL GROUNDWATER SAMPLE ANALYTICAL RESULTS
 (page 2 of 2)

Sample Number	Date	TPHg	Benzene	Toluene	Ethyl-Benzene	Total Xylenes	MTBE	ETBE	TAME	TBA
MW8	1/02	<500	<10	<10	<10	<20	7,400	<10	24	<50
MW9	1/02	<500	<10	<10	<10	<20	410	<10	<10	<50
MW10	1/02	<500	<10	<10	<10	<20	160	<10	<10	<50
MW11	1/02	<500	<10	<10	<10	<20	190	<10	<10	<50
MW12	1/02	<500	<100	<100	<100	<200	310	<100	<100	<500

Notes:

Results reported in units of micrograms per liter (ug/l.)

No detectable DIPE was reported above the detection limit in any sample during any of the sampling events.

NS = Not sampled due to the presence of phase-separated hydrocarbons in the well.

NA = Not analyzed

TPHg = Total petroleum hydrocarbons - gasoline range, analyzed in general accordance with EPA Method 8015M

MTBE = methyl tertiary butyl ether analyzed in general accordance with EPA Method 8260B

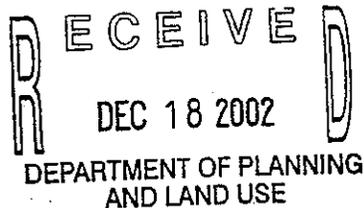
DIPE = di-isopropyl ether analyzed in general accordance with EPA Method 8260B

ETBE = ethyl tertiary butyl ether analyzed in general accordance with EPA Method 8260B

TAME = tertiary amyl methyl ether analyzed in general accordance with EPA Method 8260B

TBA = tertiary butyl alcohol analyzed in general accordance with EPA Method 8260B

Note that < indicates that the reported concentration was below the laboratory detection limit for the relevant analytical method.



20 Plaza Viejas
Alpine, CA 91901
Dec 16, 2002

Gary L. Pryor, Director
Department of Planning and Land Use
5201 Ruffin Road, Suite B
San Diego, CA 92123

Re: County of San Diego General Plan Update 2020; Log No, 02-ZA-001

Dear Director Pryor:

Please incorporate this letter into the file on the GP Update 2020. Also please keep me informed of any future action on this project.

I was very concerned and upset to learn that the GP Update 2020 proposes some changes for future development and land use for the unincorporated community of Alpine which I am adamantly opposed to. I moved to Alpine because I wanted to live in a rural place, not a city. I am not the only one in Alpine with feeling! In fact, most of my Alpine neighbors have at one time or other mentioned to me how much they love living there because of the peace and quiet, the unique small town atmosphere, the proximity to our beautiful back country mountains, and the fact that they can keep horses and large dogs which are not normally allowed in urbanized areas. I personally appreciate the fact that even in a rental apartment I am able to have a large garden, a beautiful view of the mountains, and sleep soundly at night because it is so quiet.

I moved to San Diego County from Boston because I was sick and tired of living in a city and I knew that in the County you could live in a nearby rural place yet still get a decent job. In the first six months I was in California I lived in San Diego in the Navaho neighborhood, but found that despite the close commute to work and nearness of the Mission Gorge Regional Park I still was unhappy living in a city. So I looked high and wide for a place I could be happy, living in a rural place but close enough to my place of work with the County that I could commute in. Alpine was my choice and has been a great place to live, until I realized from attending multiple Alpine Planning Group meetings that a small group of developers have pushed and shoved their way into APG to have their personal (and financial) agendas met. These people are not in the least representative of the Alpine community at large.

I grew up in a once beautiful rural place that allowed extremely poor development projects to be put through. The result is that that town is now trashed, the adjacent small town center has had most of the businesses in its historic downtown area close, and the town has been overrun with gangs, drug dealers, and some religious cults (this is Attleboro, Massachusetts, where last year one of these religious cult members was convicted of starving his infant son to death). Since that time, some 30 years of poor land

use planning, have changed that community from a peaceful place to raise a family – to a strip mall of ugly development. Although my parents generation allowed this to happen through their apathy, I am letting you know here that I have no intention to follow suit. I will do whatever I can to fight the proposed change of Alpine from a rural small town to a city. Had I wanted to live in a city I would have stayed put and not moved to Alpine.

The Alpine community, except for developers and their lackeys, does not want a significant increase in our population. The majority of residents are happy to be a country/town with a population no greater than 10 to 20% more than we now have. Its my understanding that development projects already approved by the County will easily meet that population goal and indeed, exceed it. Some of us (myself included) would prefer if even fewer people lived here.

Our infrastructure has been totally neglected by the County and must be brought up to standards before any further building takes place. Explain how the County intends to remedy this situation before increasing densities as it has said it would do.

The EIR for Goals 2020 must answer the following questions:

Why have current projects been allowed to provide inadequate or no mitigation for air quality, noise or safety along our roads with adequate pathways?

Why has the County failed to consider cumulative impacts of all the projects it has approved for our community? Explain how the cumulative impacts will be analyzed and adequately mitigated for past, future and current projects after the Goals 2020 EIR is certified.

Why has the negative declaration been so liberally used, thus failing to require the safeguards for the community that an EIR mandates? That failure has resulted in significant negative air quality, traffic, noise and visual impacts to the Alpine community in spite of substantial evidence in the record (see Sun River, TM ----; Alpine Ranch Estates West II, TM 5063, Alpine Country Village SPA ----) proving that reasonable mitigation measures would have reduced those impacts to below significance. The continual practice by DPLU to ignore cumulative impacts through the overuse of negative declarations has resulted in a reduced quality of life, increased risks to human health and well being, and destruction of community character throughout Alpine. Explain how the County proposes to require and enforce adequate mitigation measures for future projects in Alpine and throughout the county after the EIR is approved.

Why has the County refused to provide no more than one acre in a public park for the Alpine population of over 15,000 people? I would like to point out that this is a standard approximately equivalent to what was found in the City of Stanton (aka the armpit of Orange County) back in the early 1990s. How will this deficit in Alpine be remedied after implementation of Goals 2020 and who will pay for the purchase, development and maintenance of adequate park space for our community?

How will you attain the stated goals of infrastructure before any upgrade in zoning? A token 'fair share' payment will not suffice.

How will you curtail building until infrastructure is improved? (Not just roads with our current LOS F at major intersections, but also schools, parks, a library, water, sewer, and sheriff and fire protection.)

How will these infrastructure up-grades be financed?

Some of the areas impacted by the proposed map are as follows:

Alpine Boulevard cannot handle the dense zoning proposed. It is also currently characterized by a number of lovely rural-style and unique small businesses which more urbanized commercial land uses would not be compatible with. No one is going to come to Alpine so they can go to yet another Kearny Mesa-like (or on a really bad day, I would say Orange County-like) scene! Why bother traveling out that far, when you can find that already in the city?

Traffic is already LOS F at intersections. I currently always exit at the Harbison Canyon/Dunbar Lane exit to avoid the long wait at Tavern Road. The feeder streets are not wide enough and have no pedestrian pathways to make walking safe. The plan requires sewer for such density, but already the Lakeside sewer district is over capacity as shown by the foul smell along Old Highway 80 west of Dunbar Lane. The sewer plant needs to increase its capacity markedly before such density increase along Alpine Boulevard is allowed. How will this be accomplished and financed?

The County has stated that Alpine will be recommended as a transit hub, a center of mass transit, to the Board of Supervisors. The majority of residents do not want that to happen. It would turn Alpine into a city. The County has promised repeatedly that Alpine would control its own destiny. A proposal like this does not fulfill that promise. And where will we get the water to sustain that level of development?

I would propose as an alternative that the County increase residential housing densities in the already urbanized communities, such as the City of San Diego and along coastal areas where the increase in population density could support and sustain a good public transportation network. I lived for over 20 years in metropolitan Boston, as well as a year in San Francisco, and found that in these more densely developed cities most people use the public transit system as it is most convenient, including high paid professionals like doctors and lawyers. This improves the system overall and helps to sustain it financially (though public transit will never be a for-profit venture). If you continue to push Alpine into urbanization – people like myself who prefer a rural atmosphere will merely move further out and continue to drive in to work – despite the greater mileage and waste of gas!

The threat to repeal Board Policy I-78 barring package sewer treatment facilities is unconscionable. The implementation of this repeal would allow open season on Alpine

and enable developers to build in many areas that are now "off-limits" increasing Alpine's population without restraint or regard for present infrastructure deficits. All environmental impacts of such a repeal must be addressed and adequately mitigated in the goals 2020EIR, including impacts to the rare, threatened and endangered species located on Wright's Field, which is MSCP pre-approved mitigation land.

Tavern Road is another problem with the County's map. It shows an increase in density from Arnold Way to South Grade Road with two dwelling units per acre instead of the current one per acre. If this is implemented, it would require sewer extension along all of Tavern. This is in violation of the Alpine Community Plan which states under PUBLIC FACILITIES AND SERVICES, Policies and Recommendations, # 11, "Boundary extensions of the Alpine Sanitation District beyond the Country Town are considered urbanizing and not consistent with the primary goals of maintaining the rural character of the community." It would also encourage commercial development along Tavern Road. Alpine has stated that we want commercial development along Alpine Boulevard to the east, not along Tavern Road.

The Community has agreed that Willows Road from west to east Willows off-ramps and Alpine Boulevard along the same area should be up-zoned to commercial. This would allow more than enough parcels for businesses and multi-family dwellings. However, the same problem exists in that area with inadequate sewer capacity in Lakeside. Are you proposing a sewer treatment plant in Alpine? The Majority of residents do not want that to happen.

Dunbar Lane has been designated by the Community as a residential area only. However several developers have repeatedly tried to get commercial projects approved in that area. Will the County uphold our wishes against commercial zoning in that area?

Instead of trying to "shoehorn" increased population into areas that do not have the infrastructure to handle it (density based planning), the County should determine what resources are available and then see how much population those resources can support (resource based planning). As I mentioned before, the highest density should be in the cities near the coast where infrastructure already exists and old structures are crying for renovation. The use of the county Water Authority Line as an arbitrary line of demarcation for increased density does not consider rural character, infrastructure and resource limitations of communities like Alpine where quality of life has already been significantly compromised by poor land use planning practices because those factors have been ignored.

The logical place for increased population is in areas that are already developed. To move to increase population densities in the currently less developed areas represents "leapfrog development" at its worst and is completely against the concepts which initiated CEQA in the first place. And if some families want to live in the country, they can buy houses here from those who want to move closer to transportation, work, or the recreation that cities can offer. Leave our countryside alone to renew our spirits and give us a break from the pressures of too much density.

We need to have urban limit lines around the densely populated cities and not allow them to sprawl out into the countryside. How will Goal 2020 implement this program?

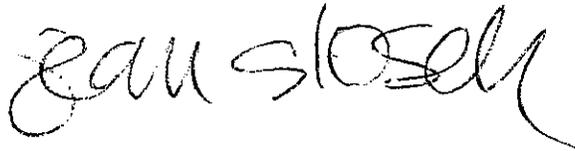
We have not seen responsible land use planning implemented in Alpine in the past ten years or longer. It is therefore reasonable to assume that future projects would continue to disregard smart growth principles. Also because the new Alpine Community Plan has been developed by the building industry representations on the Alpine planning group without regard for the best interests of the majority of residents in our community. Such obvious conflicts of interest should restrain the self-serving decisions of those people who are planning only for their own benefit and not for the majority of residents in our community.

The Goals 2020 EIR must incorporate factual information and adequate mitigation measures as noted in preceding paragraphs. We must live forever with the results of poor planning practices and it is time for them to cease in favor of a plan that would ensure an enhanced quality of life for everyone, not just developers and their friends.

Thank you for considering these comments. I will be sending you also a signed copy of this via USPO, but because of the deadline I had to send this e-mail today.

Respectfully,

Jean Slosek

A handwritten signature in black ink, appearing to read "Jean Slosek", written in a cursive style.

Cc: Supervisor Dianne Jacob

DR. A. STARKEY
P. O. Box 594
Pine Valley, Ca. 91962
619 478-5108

R E C E I V E
DEC 16 2002
**DEPARTMENT OF PLANNING
AND LAND USE**

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

RE: Notice of Preparation of an Environmental Impact Report for the County of San Diego General Plan Update 2020 and Public Notice

To whom it may concern:

On page 3 of the NOP preparation Document it states that existing ordinances regulations, rules and acts maybe replaced, repealed, adjusted, Rescinded, amended etc. during this program EIR process. Please consider this letter as my written request to be noticed of any and all revisions, replacements or rescinded policies so I can comment on these changes individually and please notify me of the availability of the draft EIR. I would also ask that all maps including those generated by the special interest group be made available to the public.

Many of the libraries in East County have limited hours and many residents of East County work in town, I would therefore request that all documents and maps be made available at all libraries in San Diego County.

Thank you for your attention in this matter.

Sincerely,

Dr. A. Starkey

Dr. A. Starkey
December 14, 2002

Pryor, Gary L

From: John Stewart [j-stewart@cox.net]
Sent: Monday, December 16, 2002 8:10 AM
To: Pryor, Gary L
Subject: Del Dios Representation

Dear Gary,

Did I mention that I was recently elected to the San Dieguito Community Planning Group on a widely-published platform of representing and preserving Del Dios and Lake Hodges? I got some 300 votes that appear to come from the Del Dios community, in addition to over a thousand from other parts of the San Dieguito area. I mention this because many of the residents of Del Dios do not feel well-represented by the Town Council. The Council doesn't "Speak for the community" as claimed in their EIR response. They speak for a narrow, self-interested group whom we call the "warlords."

In the summer of 2001, an absentee landlord, having FAILED in a bid to get onto the San Dieguito Planning Group, took a hard run at the existing Town Council (see the attached rant that was put in every mail box). She and her "warlords" made it so unpleasant that many good, law-abiding representatives quit. The Town Council meetings have declined to the point where they rarely get more than 6 to 8 attendees (all "regulars" or spouses of the Council members). This is in part because the agendas are not published more than a week in advance and are rarely specific. We got 5 days' notice on the Draft 2020 Plan a year ago (which the absentee landlord above drafted).

In spite of a recent full-court press by phone, The Town Council was unable to get a quorum in attendance of 25 voters out of an estimated population of over 440, even for their "elections," without soliciting proxies after-the-fact. (I'm not sure a quorum of less than 6% of the populace is legally binding in any case. The County Registrar voters does not regulate or oversee these elections in any way, as mine was.)

The "Board," as they like to call themselves, includes several members with conflicts of interest regarding Lake Hodges operating issues (the concessionaire himself, for one), self-interests in developing the restricted City lots, and several who have/are engaged in illegal construction, in violation of County Codes, the 1995 General Amnesty and the 1954 Moratorium. Although the Town Council by-laws would prevent anyone who engages in unlawful practices from serving, many blind-eyes are turned out here (one Board member is currently under citation by the County and was during the "elections"). Even the current Chairperson has personally told me, just few weeks ago, of the intent to *bootleg* an illegal bedroom, "Because, if applied for, permits would be denied!"

The Town Council accuses me of representing the "dis-enfranchised," and I'm proud to do so, if I can represent the interests of more than 10 times as many residents of Del Dios as they do. The Town Council has not solicited community input on the EIR in any way. The input they provided is from two people, the preparer and the Chair, and is based on the document I handed to Michelle Yip on Saturday. The previous Community Plan was prepared by one who does not even reside in Del Dios and was rubber-stamped by the "warlords."

I bring all of this to your attention so you know how to weight the inputs you receive on such issues as the 2020 Plan, EIR, etc. I have no conflicts of interest, own no former City lots, have drawn permits for all construction that requires them, and am not knowingly engaged in any unlawful practices. I have attended the Planning Group and Steering Committee meetings since August. I am very active on the San Dieguito River Park Citizen's Advisory Committee, and have trained with the San Diego Wildlife Tracking Team to do MSCP audits. I have no interests other than to serve the community in the capacity for which they duly elected me, and to establish the rule of law in Del Dios.

I realize that impeaching the credibility of the Town Council does not elevate my own, but I can no longer stand for the Town Council's claiming to speak as the exclusive representative voice for the community at large. That is a total mis-representation. They are neither the exclusive voice nor representative of the community as a whole. Again, they do not "Speak for the community."

Please copy me, as the elected Planning Group representative, on any feedback, revisions or questions you or your group may have that relate to 2020 General Plan and Del Dios Planning Process issues. Likewise, please

12/16/2002

copy the Town Council on such items. Two heads are still better than one, and 300 votes are more significant than 25. I hope that your office and the County will accept and incorporate input from any well-reasoned source as relates to Del Dios. I am asking the San Dieguito Planning Group to obtain and provide me with the CD-ROM of voters addresses, so that I can survey and ensure that we have the broadest input from what is clearly a divided community.

Sincerely,
John M. Stewart
19742 Lake Drive
Escondido, CA 92029 (Del Dios)
760 745-1244

12/16/2002

Pryor, Gary L

From: John Stewart [j-stewart@cox.net]
Sent: Saturday, December 14, 2002 1:27 PM
To: Pryor, Gary L
Subject: EIR comments & Steering Cmte Meeting

Hi, Gary...

Attached is a copy of my comments on the EIR Preparation notice, as were hand-delivered to Michelle Yip this morning. This is in case you were personally interested, or she forgets to log them in.

The point I was trying to raise at this morning's meeting was that the City Of San Diego conducted extensive percolation studies throughout the community of Del Dios. Their findings were addressed in City Manager's Report 96-64, and indicated that each residence would need 3 acres of leaching area to handle the load. The City still holds 525 lots in here (5,000 sq ft each) that could be sold and developed. I was trying to get the maps to reflect 1DU per 4 acres for Del Dios, on the basis of their percolation studies, instead of the 1 DU per 2 acres, as they are now drawn (including the new ones presented this morning). I wanted to get the 96-64 reference into the record of the minutes. Unfortunately Lois did not read the question as written, but ad-libbed in the wrong direction. I am well aware that Del Dios is an odd dog and did not mean to de-rail the vote or discussion of the measures.

Best...
John Stewart

12/16/2002

John M. Stewart
19742 Lake Drive
Escondido, CA 92029-7609
(760) 745-1244
E-mail: J-Stewart@Cox.net

December 13, 2002

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

Attn: Gary L. Pryor, Director

RE: Notice of County 2020 Plan EIR Preparation, Log No. 02-ZA-001

Dear Mr. Pryor:

Following are my comments on the Scope and Contents of the proposed EIR:

1. Aesthetics. Lake Hodges Basin, from the stand of Eucalyptus along Del Dios highway, north of Crosby Estates to Via Rancho Parkway, west to the ridgeline of Mount Israel and east to San Pasqual Valley is considered a "cornerstone property" in the County's MSCP plans and in the San Dieguito River Park. The views should be considered from Lake Hodges, the Major Focus Area of the San Dieguito River Park, as well as from Route I-15 and Del Dios Highway. The views from the trail system of Elfin Forest Reserve and the ridgeline trail above Olivenhain Dam should be considered and preserved.
2. Biological Resources. The Lake Hodges Basin is unique in that it is fed by five year-round springs and creeks – two to the north of Lake Hodges, along Lake Drive, Felicita Creek, Lusardi Creeks (south and north, the latter not being officially named), and the creek that feeds the water falls in Piedras Pintadas Park. These and the surrounding riparian, chamissal, coastal oak, and scrub habitat provide homes to Duskyfooted Woodrats, Mule Deer, Red Diamond Rattlesnakes, California Gnatcatchers, Roadrunners, Golden Eagles and other species of concern. Endangered plants include the Encinitas bacharris. Five wildlife corridors have been identified through the community of Del Dios (see attached map). The San Diego City MSCP maps incorrectly identify the Del; Dios area as non-native vegetation, while the County maps show it as area without preservation agreements.
3. Cultural Resources. The area around Lake Hodges has many Kumeayee sites, including the Piedras Pintadas and "Ringing Rocks." All around the Lake and in the watercourses feeding it are Kumeayee grinding rocks. The area below the Lake Hodges Dam includes the Harris sites of major paleontological importance. The latter are among the oldest human habitation sites in North America, being 12,000 years old. Other such sites may well exist in the Lake Hodges Basin. Geological resources include ancient Santiago lava flows, Lusardi cobbles, Pudding stone and up-lift structures.

4. Geology and Soils. The City Manager's Report 96-64 states that percolation studies in the Del Dios area reveal that each residence would need three acres of leaching area to handle the septic load. The community is not served by sewers and lies adjacent to, and up-slope from, the Lake Hodges Reservoir. The latter will become part of the Emergency Supply Project in 2008, to provide emergency drinking water to the entire County. Any development in the Del Dios area, including on the restricted-use lots acquired from the City would only further pollute this water supply.
5. Hazards and Hazardous Materials. The community of Del Dios lies at the wildland-urban interface, with the River Park directly across from residences. With Lake Hodges at its lowest levels in 30 years, the amount of flammable vegetation around the Lake is more than three times greater than normal, and is dry. The Oaks are 30% to 50% dead material. In addition, trail maintenance, and the State policy of "lop it and drop it," to provide habitat, has accumulated an inventory of burnable material adjacent to homes. The community has requested the County DPW to remove or chip such trail maintenance debris whenever it falls within 300 feet of a home. The volunteer fire department at Del Dios has been decommissioned. The community is at high risk from wildland fires that would rip up the chamissal slopes to Del Dios Highway. Note that the Del Dios water distribution system is substandard, giving the community the lowest possible ISO fire rating. Any development only further reduces the community's ability to fight fires.
6. Hydrology and Water Quality. Lake Hodges is largely fed by subterranean flows that are very sensitive to runoff and septic pollution. The Lake is on the list of 110 polluted Lakes in California. The area around Del Dios has average 18% slopes, such that grading and clearing of lots creates a risk of mudslides and of added runoff to pollute the Lake and water supply. When the Lake is connected to the ESP, the level will be maintained at near-full levels. This may mean greater risk of flooding in the 100 years flood plain, especially at the north and east ends of the Lake. Since grass lawns have twice the runoff coefficient of native vegetation, development poses greater risks of flooding in the watercourses, since the community of Del Dios does not have storm drains. Lake Hodges is also open to boating, with no limitations on 2-cycle engines. These dump 20% to 30% of their gas-oil mix directly into the water, unburned. Federal regulations will phase out the manufacturing of these in 2004, but their use will continue thereafter. Only Direct Fuel Injection or Four-stroke engines should be allowed on the Lake, as a drinking water reservoir.
7. Land Use and Planning. The City of San Diego sold 225 lots in Del Dios to 96 property-owners, out of 163 homes in the community. The City believed that it had restricted the use of these lots to open leaching area or to septic leach fields, by filing Ordinance O-18287 with the grant deeds. The County DPLU is not upholding these restrictions, and is allowing development under the S-80 zoning. According to the City Manager's Report 96-64, the development of even *one* of these lots that taxed the water distribution system would require the City, under the Safe Drinking Water Act, to totally replace the substandard water distribution piping system in the entire

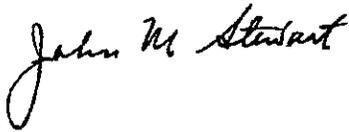
community of Del Dios. The City still holds 525 lots in the community. These should be "designated open space" under City Council Policy 700-14.

8. Noise. Lake Hodges is open to recreational boating from 5:30 a.m. to 7:30 p.m., in Noise Abatement hours. Boats are not directly addressed in the County Noise Abatement Ordinances, which limit noise to 75dB. The noise laws, as regards boats, incorporate the California Harbors and Navigation Act, which allows 85dB, even during noise abatement hours. Being a logarithmic scale, that is three times as much noise as is allowed for other sources. The boating hours should be reduced to 7:00 a.m. to respect the noise abatement rights of the Del Dios and Lomas Serenas communities. The Lake Mead Resources Management Plan introduces the concept of the "soundscape" as a part of the natural environment. National Parks have also adopted this concept in regulating water sports. As a cornerstone property within the San Dieguito River Park, the soundscape should be managed; boat engines should be limited to 30 horsepower or less, in keeping with the limitations on other City lakes.
9. Public Services. The population of the San Dieguito Planning Area is projected to grow three-fold, and the Lake hours are to be extended. This may bring seven times as many users and abusers to the Lake -- as many as 7000 users per week. The 3900 acre Lake Hodges area is the property of the City of San Diego. The City Police recently decided not to staff Beat # 283, which covers the Lake area. The community of Del Dios, which is covered by the County Sheriff, has been seeking ways to increase policing in the community and around the Lake, especially after dark. The West Side Gang of Escondido has been tagging property in the Community and has been holding parties around the Lake and on side streets of Del Dios. The community of Del Dios recently lost its volunteer fire department, although illegal campfires can be seen every-other weekend around the Lake during the summer. The community of Del Dios has been asking for reconsideration of placing a California Department of Forestry fire station in the Lake Hodges Basin and for bringing back the fire-fighting helicopter to the County.
10. Transportation and Traffic. The 308 bus route has been diverted around the Del Dios community, and the two closest stops are at Citricado Parkway and at Del Dios Ranch in Ranch Santa Fe. This works a hardship on service workers and on the elderly coming to and going from the community of Del Dios. Putting stops at Rancho Drive and at Date Lane would provide a level of mass transportation services to the community of Del Dios. Alternatively, reinstating the route through Del Dios would provide even better service. Del Dios highway carries a Level Of Service (LOS) rating of "F." This causes traffic to divert through the community of Del Dios, especially between the hours of 3:45 p.m. and 5:15 p.m. Widening Del Dios highway from Date Lane to Citricado Parkway would alleviate the cut-off traffic. Del Dios Highway (West Valley Parkway) is to be widen to four lanes as part of the Sempra/Escondido Research and Technology Park (ERTP). This seems to assume that all 4,000 workers at the ERTTP will turn left to reach I-15, rather than turning right to use Via Rancho Parkway or continuing to the coast on Del Dios Highway. We question that assumption.

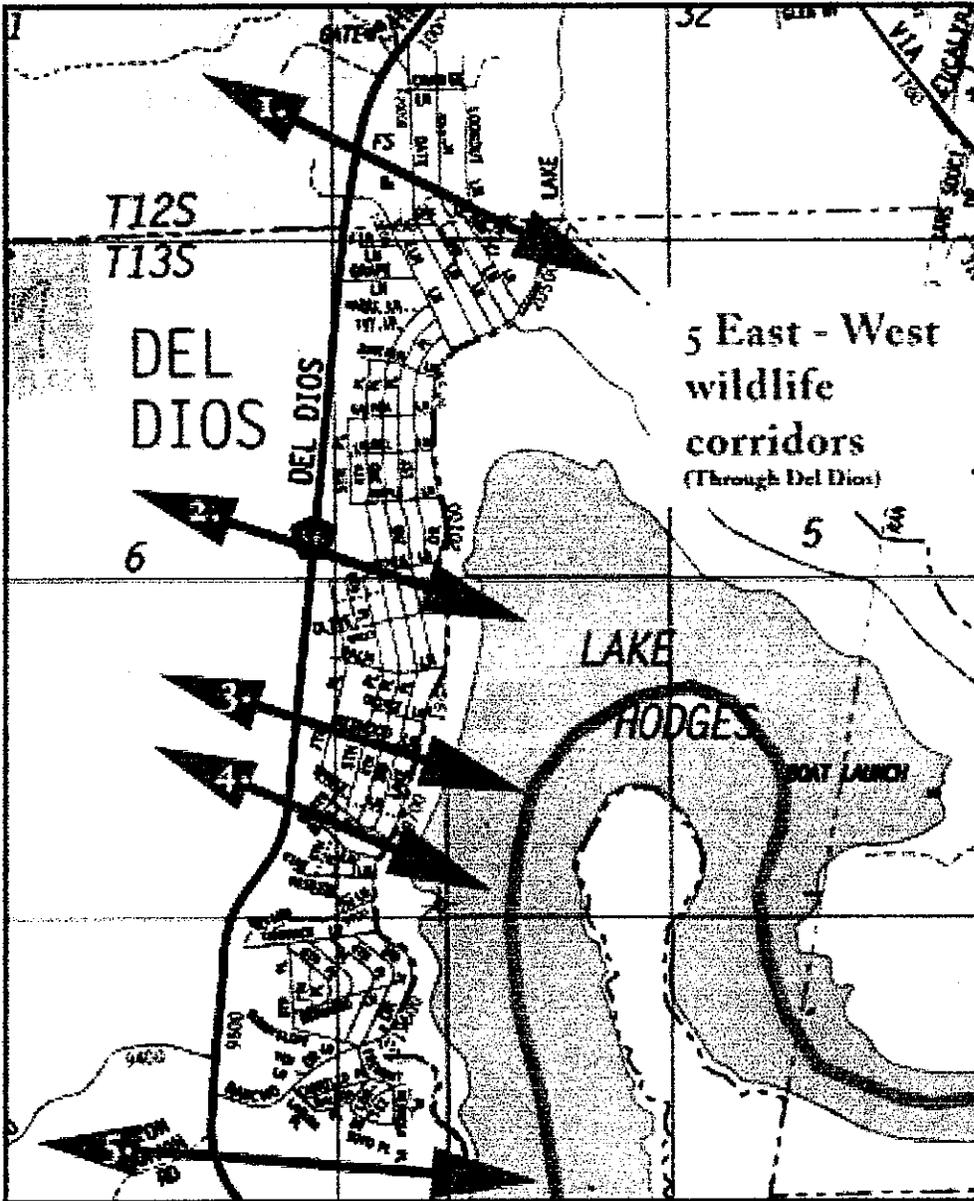
11. Utilities and Service Systems. As indicated above, the community of Del Dios is served by a local water company drawing on community wells. The supply is adequate for the existing population but may be strained by any development, even the development of the 225 lots sold by the City. The water *distribution* system is sub-standard and contributes 40% of the weighting to a low ISO fire-fighting rating. This poses a risk to the community which would be exacerbated by any development. Fire insurance is already difficult to obtain or afford in Del Dios. There are no storm drains, although the community lies next to a drinking water reservoir.

Please don't hesitate to contact me if you have any questions regarding these comments. Otherwise, please incorporate them in the scope and content of the EIR.

Sincerely,

A handwritten signature in cursive script that reads "John M. Stewart". The signature is written in black ink and is positioned above the printed name.

John Stewart



Pryor, Gary L

To: PapaStew1@aol.com
Monday, December 16, 2002 11:35 AM
To: Pryor, Gary L
Subject: R:Update 2020; LogNo,02-ZA-001

Dear Director Pryor:

We are opposed to growth in Alpine, more than 10-20%. Please consider cumulative impacts before approving future projects. Will you explain 2020 EIR?

We moved to Alpine 13+ years ago for the country atmosphere, 10,000 more people in Alpine.....I don't think so.

Please keep us informed of any future action on this project.

Thank you, Ken and Avis Stewart
2504 Camino Avena
Alpine Ca, 91901 (619) 445-1778

ATTENTION
JASON GIFFEN

GP 2020

WHAT IS THE LEGITIMATE AND PROPER PURPOSE OF THE
GENERAL PLAN 2020 BLUEPRINT ?

IT SHOULD BE TO ADAPT AND MAKE CHANGES TO THE EXISTING
GENERAL PLAN TO ACCOMMODATE THE EXPECTED FUTURE POPULATION
GROWTH, INCLUDING RESIDENTIAL, COMMERCIAL AND INDUSTRIAL.
THEREFORE, DENSITY IS A PROPER SUBJECT OF CONSIDERATION, AS WELL
AS CONSIDERATION OF LAND USE TO DETERMINE THE CHARACTER OF
THE COMMUNITY.

ONCE THE DENSITY IS DECIDED ON, THEN THERE SHOULD BE NO OTHER
RESTRICTIONS ON CONSTRUCTION, EXCEPT THOSE REQUIREMENTS TO
SATISFY THE VARIOUS DEPARTMENTS OVERSEEING THE BUILDING
INDUSTRY. BY THAT I MEAN THAT THERE NEED NOT, AND SHOULD NOT,
BE ANY RESTRICTIONS ON CONSTRUCTION BASED ON TOPOGRAPHY.
MANY BEAUTIFUL HILLSIDE HOMES CAN BE SEEN ALL AROUND SAN
DIEGO COUNTY. THEY WERE ALL REQUIRED TO SATISFY THE CURRENT
RULES, REGULATIONS, AND CODES.

I-15, ALONG WITH ALL OF THE OTHER MAJOR ARTERIES OF SAN DIEGO
COUNTY, IS BADLY CONGESTED FOR A MAJOR PART OF THE WORKDAY. IT
WOULD MAKE GOOD SENSE TO CREATE COMMERCIAL AND INDUSTRIAL
ZONES ALONG THE ENTIRE LENGTH OF THE I-15 CORRIDOR, SO THAT

EMPLOYEES CAN LOCATE WITHIN EASY COMMUTING DISTANCE FROM THEIR WORKPLACE.

WE HAVE A HOUSING CRISIS IN SAN DIEGO COUNTY. CREATING FURTHER RESTRICTIONS ON CONSTRUCTION RAISES THE COST OF BUILDING. THIS IS PASSED ON TO POTENTIAL HOMEBUYERS, WHO ARE FORCED TO MOVE FURTHER AWAY FOR MORE AFFORDABLE HOUSING. THIS ADDS TO THE VICIOUS CYCLE OF INCREASED COMMUTER CONGESTION.

TO ADD TOPOGRAPHICAL RESTRICTIONS ON TOP OF DENSITY RESTRICTIONS WOULD BE TO IGNORE FUTURE PROJECTIONS OF POPULATION GROWTH. IT WILL CREATE A SITUATION IN WHICH ONLY THE WEALTHY CAN AFFORD TO LIVE WITHIN THE CENTRAL PART OF THE COUNTY.

GROWTH RESTRICTIONS MAY SOUND GOOD TO THOSE WHO ALREADY HAVE THEIR SHARE OF THE AMERICAN DREAM, BUT THE RESULT WILL LEAVE THE WORKERS OF SAN DIEGO COUNTY TO ENDURE STRESSFUL AND ARDUOUS COMMUTES ALONG BADLY CONGESTED HIGHWAYS. TO DENY THE TREMENDOUS PROJECTED GROWTH OF SAN DIEGO COUNTY IS A HUGE MISTAKE. A MISTAKE THAT COULD HAVE DISASTROUS CONSEQUENCES FOR THE HEALTH AND WELFARE OF IT'S CITIZENS. PEOPLE ARE MOVING TO SAN DIEGO NO MATTER HOW PROHIBITIVE THE HOUSING IS. WE NEED ADDITIONAL DECENT HOUSING, AND WE NEED IT NOW.



Bill Horn

Supervisor, Fifth District
San Diego County Board of Supervisors

August 27, 2002

Joseph Targia, Esq. LLB, JD
10101 Vista Montanoso
Escondido, CA 92026

Dear Judge Targia:

Thank you for taking the time to write expressing your views regarding the General Plan 2020 update. I appreciate your input and agree wholeheartedly with each of your comments regarding density, establishing commercial and industrial development along major transportation corridors, and the need for more affordable housing.

I will keep your letter on file. When this issue comes before the Board of Supervisors in the future, please be assured that I will take your views into consideration.

Thank you again for providing your opinion on this subject.

Sincerely,

A handwritten signature in cursive script that reads "Bill Horn".

BILL HORN

Chairman
Supervisor, 5th District

BH:sc

ALAN THUM
1392 PEACHWOOD DRIVE
ENCINITAS, CA 92024
(760) 942-3322
(pecthum@aol.com)

NOTICE OF PREPARATION
COUNTY OF SAN DIEGO GENERAL PLAN 2020 UPDATE
REQUEST FOR COMMENTS
Department of Planning and Land Use
5201 Ruffin Road, Suite B
San Diego, CA 92123
DECEMBER 16, 2002

Dear Department of Planning and Land Use,

December 16, 2002

Thank you for the opportunity to formally submit comments on the County of San Diego's Notice of Preparation regarding the General Plan 2020 Update. Alan Thum

GENERAL COMMENTS.

1. Planning Level. The County needs to revise the scale at which it does planning and it needs to provide a mechanism for planning more effectively at the landscape level, i.e. by individual watersheds. The County routinely reports information on a "whole county" basis, which works well for the human and jurisdictional legal view of the world, but not for the ecological view of the world. Even the MSCP, while "researched" at the right scale, is not reported at the right scale. The County needs to plan and report information at the whole watershed scale, and information at the subwatershed scale would be even better! County data need to be integrated with City data so that we can get to whole watershed management, i.e. watershed based zoning. The public cannot respond to County educational and public outreach efforts unless the County can at least communicate on an individual watershed basis. If the County reports high bacterial counts along the coast or tells me that San Diego Bay exhibits high concentrations of PCBs; my response would be "it is somebody else's fault." If the County reported that there is a persistent pollution problem in the Escondido Creek Watershed, you might get my attention. But if the County (in cooperation with the cities) reported that the pollution source was associated with the subwatershed in which I actually live or work, then I or my neighbor or local businesses are responsible!

2. External Forcing Functions. There are several forcing functions that will severely limit the effectiveness of the County of San Diego's ability to implement the General Plan 2020 Update, regardless of its content.

Population Growth. SANDAG (1999) has projected that San Diego County will grow by 44% by the year 2020! The unincorporated area is projected to grow by 55%! SANDAG (1999) has also projected the long term growth for each of the 18 cities. Most of the 11 watersheds in San Diego County are occupied by 2 - 7 cities, and also by the County.

The County often has the largest jurisdiction. Since the growth projections are based on jurisdictional boundaries, it is impossible to interpret these data in detail on an individual whole watershed basis. Also, the jurisdictional boundaries of some cities actually may overlap several whole watersheds. Nonetheless, all watersheds will experience growth on the order of about 30%, and some the projected growth rate will be dramatic and on the order of 90%. For example, the City of Carlsbad and the City of San Marcos are projected to grow by 97%, and 93% respectively, and they both occur in the same watershed (the San Marcos Creek Watershed)! The City of Chula Vista is also projected to grow by 82% and it is located within the Sweetwater River and Otay River Watersheds. The location and growth rate of each city and portion of the County within each watershed needs to be investigated and re-mapped on a watershed basis! Where this growth takes place is absolutely critical! See alternative proposed below.

Long Term Drought. NOAA (L.A. Times 2000) has projected a long term drought for the next 20 – 30 years, with about 33% less precipitation. Episodic El Nino events may provide some short term local relief, but since runoff will be accelerated (not infiltrated), it will have little ability to counter the long term effect of decreased rainfall. The long term dry cycle will have significant impacts on the condition of the upland plant communities throughout each watershed. However, how the drought will impact riparian plant communities will depend on the location of developed land within individual watersheds. Riparian plant communities located downstream from developed areas typically receive year-round flow, so the stream located below a developed area may superficially appear “green”, hence, in good condition. But streams experiencing a change from seasonal to perennial flow will also experience a significant shift in the species composition of the riparian plant and animal communities. This will be especially evident as an invasion of exotic plant species. Many of the riparian communities throughout San Diego County are already been dramatically impacted by invasive plant species. Consequently, a city located on the coast may be unaware of major environmental problems that will accrue in the upper watershed outside of its jurisdiction. The Soil Conservation Service (1993) reported that land within the Escondido Creek watershed is over-irrigated by 2 – 3 times what is necessary or proper plant growth!

3. Suggested General Plan Alternative. New watershed data from the East Coast can provide the County with an ecological argument for smart growth planning. The problem for San Diego County is the challenge of “where to draw the no-growth” boundary line. Rather than just arbitrarily drawing a no-growth density circle at some distance from a city central area, e.g. done by Portland, OR, the Pew Oceans Foundation (2002) has recommended that the amount of “impervious cover”(development) should not exceed 10% in any subwatershed. Rather, we should increase “impervious cover” (develop) in those subwatersheds that already have a high percentage (i.e. greater than 10%) of impervious cover and invest in Best Management Practices to control for runoff contaminant and bacterial loading. So, the new General Plan needs to calculate the amount of existing impervious cover for each subwatershed (for all county and city land), and then provide the results to everyone along with the conceptual model developed by Schueler (1995), which identifies thresholds of impervious cover for impacting streams and riparian habitats. At this time the cities and the county are ignorant of the severity or

significance of storm water and year-round runoff and how to manage the footprint of the source of the loading. Hence, if we continue to develop, i.e. increase impervious cover, in those subwatersheds that are currently functioning well, we will never be able to eliminate beach closures! In summary, I recommend that a "watershed based zoning alternative," as an ecological argument for smart growth, be included as an alternative in the DEIR for evaluating the General Plan 2020 Update. Somehow, the new General Plan has to accommodate much better coordination and integration with city general plans, or else neither will work. Cities have to step up to whole watershed planning, and the County has to step down to individual watershed planning.

4. Biological Resources. The baseline information needs to be presented on both a regional and a whole watershed basis. Biological data that stops at some jurisdictional boundary is meaningless. All maps should include whole watershed boundaries, and also subwatershed boundaries. Data tables should be available (at least electronically) at both the whole and subwatershed level. The MHCP (North County) and Subarea (city) mapping prepared by Sandag (2000) is a good example of what not to do.

December 3, 2002

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

Re: Comments in Response to Notice of Preparation of the General Plan
Update 2020
Log No. 02-ZA-001

Dear Lead Agency:

Please consider these comments on behalf of the McCarthy Revocable Trust ("McCarthy Trust") during the public scoping meeting for preparation of the environmental impact report ("EIR") for the County's General Plan 2020 Update on December 5, 2002.

The McCarthy Trust is the owner of the Pala Rey Ranch ("Ranch"), consisting of approximately 590 acres south of the San Luis Rey River, east of the I-15 Freeway and west of the Pala Indian Band's reservation land in the unincorporated area of northern San Diego County ("County"). The land has been used for agricultural and ranching purposes for decades.

The Ranch is located outside of the boundaries of the San Diego County Water Authority, but within the boundaries of the San Luis Rey Municipal Water District ("District"). The District recently published a report to supplement the San Luis Rey Municipal Water District Management Plan, based upon the work of two separate water resources consultants, demonstrating the adequacy of an available water supply for a higher density of development than the current zoning would allow. In addition, the Ranch has its own independent water supply, which has been a reliable source for decades, meeting both irrigation demands, and the people who live at the Ranch.

I am writing to ask that the environmental impact report ("EIR") address the potential environmental impact on water and other environmental resources were the Ranch to be developed at a much higher density of residential and commercial development (at least triple) than allowed for under the current zoning, given the availability of a secure water supply, and the presence of a public agency which has been organized to serve the water and provide municipal-level water services.

County of San Diego
Department of Planning and Land Use
December 3, 2002
Page 2

I will be happy to ask the District to submit its report for inclusion in the EIR, or to provide additional information. If you have any questions, or would like additional information, please contact my representative: Adam Duncan (213) 817-2211.

Yours very truly,

/s/

Kathleen L. McCarthy

cc: Adam Duncan

Pryor, Gary L

From: Sandra Vanek [vane@nethere.com]
Sent: Saturday, December 14, 2002 8:48 AM
To: Pryor, Gary L
Subject: Goals 2020 comment letter

Gary L. Pryor, Director
Department of Planning and Land Use
5201 Ruffin Road, Suite B
San Diego, CA 92123

Re: County of San Diego General Plan Update 2020; Log No, 02-ZA-001

Dear Director Pryor:

Please incorporate this letter into the file on the GP Update 2020. Also please keep me informed of any future action on this project.

The Alpine Community, except for developers, does not want a significant increase in our population. The majority of residents are happy to be a country/town with a population no greater than 10 to 20% more than we now have. The projects already approved by the County will easily meet that population goal and indeed, exceed it.

Our infrastructure has been totally neglected by the County and must be brought up to standards before any further building takes place. Explain how the County intends to remedy this situation before increasing densities as it has said it would do.

The EIR for Goals 2020 must answer the following questions:

Why have current projects been allowed to provide inadequate or no mitigation for air quality, noise or safety along our roads with adequate pathways?

Why has the County failed to consider cumulative impacts of all the projects it has approved for our community? Explain how the cumulative impacts will be analyzed and adequately mitigated for past, future and current projects after the Goals 2020 EIR is certified.

Why has the negative declaration been so liberally used, thus failing to require the safeguards for the community that an EIR mandates? That failure has resulted in significant negative air quality, traffic, noise and visual impacts to the Alpine community in spite of substantial evidence in the record (see Sun River, TM ----; Alpine Ranch Estates West II, TM 5063, Alpine Country Village SPA ----) proving that reasonable mitigation measures would have reduced those impacts to below significance. The continual practice by DPLU to ignore cumulative impacts through the overuse of negative declarations has resulted in a reduced quality of life, increased risks to human health and well being, and destruction of community character throughout Alpine. Explain how the County proposes to require and enforce adequate mitigation measures for future projects in Alpine and throughout the county after the EIR is approved.

12/16/2002

Why has the County refused to provide no more than one acre in a public park for the Alpine population of over 15,000 people? How will this deficit be remedied after implementation of Goals 2020 and who will pay for the purchase, development and maintenance of adequate park space for our community?

How will you attain the stated goals of infrastructure before any upgrade in zoning? A token 'fair share' payment will not suffice.

How will you curtail building until infrastructure is improved? (Not just roads with our current LOS F at major intersections, but also schools, parks, a library, water, sewer, and sheriff and fire protection.)

How will these infrastructure up-grades be financed?

Some of the areas impacted by the proposed map are as follows:

Alpine Boulevard cannot handle the dense zoning proposed. Traffic is already LOS F at intersections. The feeder streets are not wide enough and have no pedestrian pathways to make walking safe. The plan requires sewer for such density, but already the Lakeside sewer district is over capacity as shown by the foul smell along Old Highway 80 west of Dunbar Lane. The sewer plant needs to increase its capacity markedly before such density increase along Alpine Boulevard is allowed. How will this be accomplished and financed?

The County has stated that Alpine will be recommended as a transit hub, a center of mass transit, to the Board of Supervisors. The majority of residents do not want that to happen. It would turn Alpine into a city. The County has promised repeatedly that Alpine would control its own destiny. A proposal like this does not fulfill that promise.

The threat to repeal Board Policy I-78 barring package sewer treatment facilities is unconscionable. The implementation of this repeal would allow open season on Alpine and enable developers to build in many areas that are now "off-limits" increasing Alpine's population without restraint or regard for present infrastructure deficits. All environmental impacts of such a repeal must be addressed and adequately mitigated in the goals 2020EIR, including impacts to the rare, threatened and endangered species located on Wright's Field, which is MSCP pre-approved mitigation land.

Tavern Road is another problem with the County's map. It shows an increase in density from Arnold Way to South Grade Road with two dwelling units per acre instead of the current one per acre. If this is implemented, it would require sewer extension along all of Tavern. This is in violation of the Alpine Community Plan which states under PUBLIC FACILITIES AND SERVICES, Policies and Recommendations, # 11, "Boundary extensions of the Alpine Sanitation District beyond the Country Town are considered urbanizing and not consistent with the primary goals of maintaining the rural character of the community." It would also encourage commercial development along Tavern Road. Alpine has stated that we want commercial development along Alpine Boulevard to the east, not along Tavern Road.

The Community has agreed that Willows Road from west to east Willows off-ramps and Alpine Boulevard along the same area should be up-zoned to commercial. This would allow more than enough parcels for businesses and multi-family dwellings. However, the same problem exists in that area with inadequate sewer capacity in Lakeside. Are you proposing a sewer treatment plant in Alpine? The Majority of residents do not want that to happen.

Dunbar Lane has been designated by the Community as a residential area only. However several developers have repeatedly tried to get commercial projects approved in that area. Will the County uphold our wishes against commercial zoning in that area?

Instead of trying to "shoehorn" increased population into areas that do not have the infrastructure to handle it (density based planning), the County should determine what resources are available and then see how much population those resources can support (resource based planning). Obviously, the highest density should be in the cities near the coast where infrastructure already exists and old structures are crying for renovation. The use of the county Water Authority Line as an arbitrary line of demarcation for increased density does not consider rural character, infrastructure and resource limitations of communities like Alpine where quality of life has already been significantly compromised by poor land use planning practices because those factors have been ignored.

The logical place for increased population is in areas that are already developed. If some families want to live in the country, they can buy houses here from those who want to move closer to transportation, work, or the recreation that cities can offer. Leave our countryside alone to renew our spirits and give us a break from the pressures of too much density.

We need to have urban limit lines around the densely populated cities and not allow them to sprawl out into the countryside. How will Goal 2020 implement this program?

We have not seen responsible land use planning implemented in Alpine in the past ten years or longer. It is therefore reasonable to assume that future projects would continue to disregard smart growth principles. Also because the new Alpine Community Plan has been developed by the building industry presentations on the Alpine planning group without regard for the best interests of the majority of residents in our community. Such obvious conflicts of interest should restrain the self-serving decisions of those people who are planning only for their own benefit and not for the majority of residents in our community.

The Goals 2020 EIR must incorporate factual information and adequate mitigation measures as noted in preceding paragraphs. We must live forever with the results of poor planning practices and it is time for them to cease in favor of a plan that would ensure an enhanced quality of life for everyone, not just developers and their friends.

Thank you for considering these comments.

Respectfully,

Sandra M. Vanek

Signature

Cc: Supervisor Dianne Jacob

Letter submitted by facsimile in a timely manner. A copy will follow in the U.S. Mail.

Mr. Ivan Holler

Chief, Land Use

Department of Planning and Land Use

Subject: Ground Water Database Proposal

Dear Mr. Holler

This proposal is a follow-up to our brief conversation when you suggested I submit a recommended input to the NOP.

Based upon my reading of several EIRs in the past, I make the assumption that no groundwater database exists for the use of rural homeowners, developers or planners concerned with current and future groundwater availability. I also assume that there has not been a comprehensive groundwater survey of those San Diego County regions not served by a water district. Local anecdotal information tends to support the notion that Lawson Valley residents' groundwater resources consist of generally independent pockets fed by seepage through cracks in granite. In order to develop the comprehensive database I envision, a county-wide survey would be needed, quite possibly using techniques and equipment developed by oil exploration companies.

The suggested database and envisioned users would aid to ensure that all levels of planning would be using the same validated groundwater information. It would also ensure that predictions of groundwater availability would reflect climatological behavior over time.

Thank you for your interest. I hope this suggestion is not too late for the WOP, if accepted. In haste, I am -

Sincerely
Clyde Wahl

3622 Redneck Drive
Jamaul 91935-2701
619 445 2934

Page 2 of 2

Gary L. Pryor, Director
Department of Planning and Land Use
5201 Ruffin Road, Suite B
San Diego, CA 92123

LATE



Re: County of San Diego General Plan Update 2020; Log No. 02-ZA-001

Dear Director Pryor:

Please make this letter a part of the file on the GP Update 2020. Please put me on the mailing list for any future action regarding GP Update 2020.

We, and many other Alpine residents whom we have spoken to, chose to live here because of the small town, rural, slow paced, feeling of the area. We feel that this pleasant atmosphere is primarily the result of the relatively low housing density in most of the area. We like it that way and are very concerned that the county may side with the developers who would be happy to destroy this ambiance just to make a fast buck. We realize a certain amount of growth is unavoidable, but it must be well planned growth that ^{does} not make Alpine just another busy, noisy, polluted and unpleasant suburb. Alpine is 30 miles from downtown San Diego and there ^{are} numerous higher density areas between here and downtown which are not yet fully developed, but already have the infrastructure to accommodate further development. The commute would be less and the general cost of maintaining existing facilities would be less than just spreading the same thing further out.

Wright's Field in Alpine is a unique nature preserve. It has such an abundance of rare, threatened, and endangered species of wildlife that would be lost forever if ~~major~~ development is allowed to take place there. To remain a really great place to live Alpine needs this vast nature preserve protected now and for future generations. This entire field should be declared a park area and settle once and for all the constant threat of developers to destroy it with sewers, houses, golf courses, sewage disposal plants or anything else that would destroy one of the few pieces of existing land that is still basically as nature intended it to be. WE NEED TO PRESERVE THIS AREA!!!

Sincerely,
William A. & Joan C.
Waterworth

Tel: (619) 659-3946

E-mail: billjoanalpine@msn.com

LAW OFFICES OF
KENNETH A. WOOD

16909 VIA DE SANTA FE, SUITE 203
P.O. BOX 2609
RANCHO SANTA FE, CALIFORNIA 92067

TELEPHONE (858) 756-4474
FAX (858) 756-8726
E-MAIL: KWOOD963@AOL.COM

December 15, 2002

Mr. Gary Pryor, Director
Department of Planning and Land Use
5201 Ruffin Road, Suite B
San Diego, CA 92123-1297

FAX ONLY: 694-2555

RE: 2020 GENERAL PLAN NOP EIR
RAMONA RIDGE ESTATES TPN 286-041-01

Dear Gary:

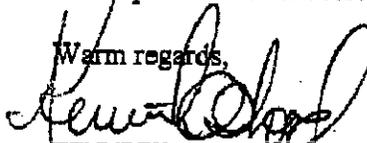
As you are aware, I have been dealing with the subdivision of Ramona Ridge Estates-216 acres in the Ramona AG 20 area- for over 11 years. It has been a nightmare to say the least.

We once again repeat our request to be exempted from 2020 based on our letter sent to in January 2, 2001. Thus, we request that the EIR study the environmental impacts of our being exempted from the rezoning i.e. being left at the 40 acre parcel size or 10 acre size which surrounds our parcel compared to the 80 acre size which is the last size I saw on your proposed 2020 maps for the area where we are located. If the EIR was accepted for the 40 acre parcels under GPA 96-03 (also called 01-01), then why are 80 acre parcels being proposed for the AG 20 parcels now? It appears that the no-growth, take all that is possible for open space advocates are influencing County staff and the study committees to the detriment of landowners throughout the east County who lose the use of their land for residential purposes without compensation.

In light of the concern for the Golden Eagles and other concerns about the development of the East County, it would be in the best interest of the County, environmentalists and the landowners in the East County to have the proposed 2020 EIR study the impacts of 10, 40 or 80 acres parcels on the Golden Eagles to determine the appropriate action to protect the Eagles and to determine what the zoning for the East County should be.

Please call if you or your staff have questions or if I can assist you in any way.

Warm regards,



KENNETH A. WOOD