

## Public Correspondence Item 2

**Ronald Ashman** (Representing District 2, Supv. Joel Anderson)  
**Douglas Barnhart** (Representing District 5, Supv. Jim Desmond)  
**Yolanda Calvo** (Representing District 4, Supv. Nathan Fletcher)  
**Michael Edwards**, Chair (Representing District 2, Supv. Joel Anderson)  
**Ginger Hitzke** (Representing District 1, Supv. Nora Vargas)  
**Tommy Hough** (Representing District 3, Supv. Terra Lawson-Remer)  
**David Pallinger**, Vice Chair (Representing District 5, Supv. Jim Desmond)

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Planning & Development Services  
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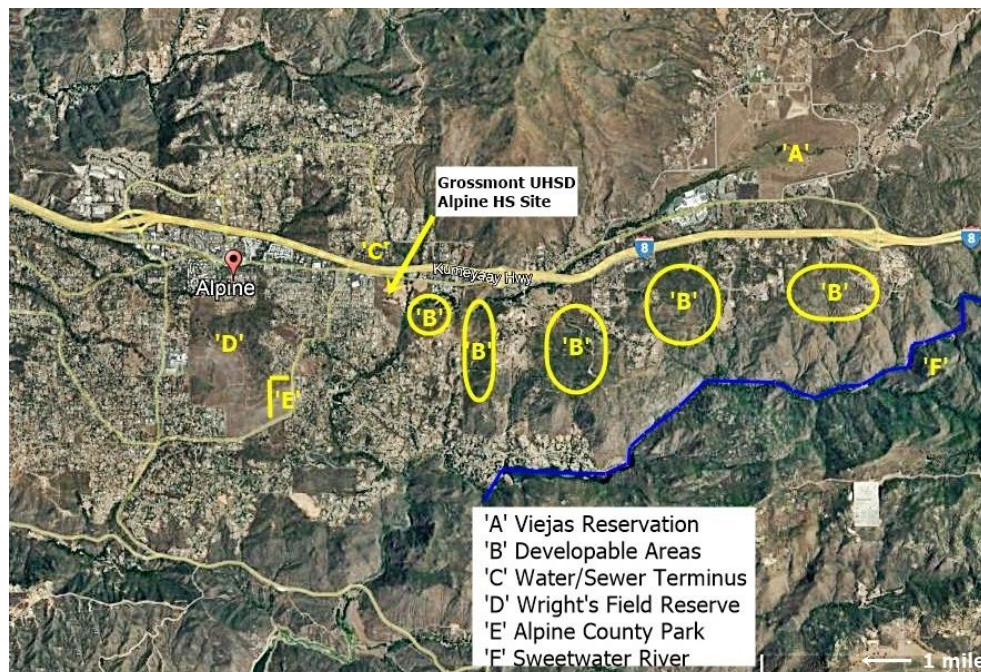
Subject: Vehicle Miles Travelled (VMT) – A “Village Node” Solution for Unincorporated Alpine

Dear Commissioners,

Representatives of Planning & Development Services (DPS) recently presented to the Alpine public the proposed County attack on climate change featuring the “Vehicle Miles Travelled” (VMT) concept.

Alpine’s Community Plan is in a final update process. It features managed residential expansion into rather large undeveloped areas deemed former lands of the “Forest Conservation Initiative” (FCI). In total those lands within the Alpine planning area represent 4,000-5,000 acres of potentially developable area. That Plan provides a “Village Node” solution for unincorporated Alpine.

Here is an annotated aerial of Alpine demonstrating the “Village Node” concept; whereby managed growth could produce a sustainable community that itself could satisfy the VMT guidelines. A developed Alpine can support the County’s strategic direction while becoming sustainable and able to contribute its greater financial support to the County while greatly reducing vehicle travel. Alpine can do its part to fight climate change through managed development.



The areas of residential development are shown as 'circles' labelled 'B'. They are adjacent to already semi-developed lands. They are the tops of bluffs over-looking the Sweetwater River. They have minimal environmental value having been highly disturbed environmentally by farming and ranching for near a century. However, their development provides mitigation to purchase and conserve the Sweetwater River and its riparian wetlands through Alpine.

They are within 1-3 miles of the current terminuses of potable and sanitary water infrastructure. Extending such infrastructure to the developable areas is not a major undertaking. Through a successful application to the Local Agency Formation Commission approval, Alpine Fire Protection District has already extended its area of fire protection and emergency medical service operations to include these areas.

These areas lay alongside Alpine Boulevard, the town thoroughfare. They lay between two on-/off ramps to Highway I-8. The 95-acre high school site owned by Grossmont Union High School District lays midway along Alpine Boulevard.

Residential development of these areas would result in a sustainable village of 20,000 to 25,000 maximum population - forevermore bounded by Cleveland National Forest to the east and south, by El Capitan Reservoir and two Indian Reservations to the north (Capitan Grande and Viejas), and bounded by El Cajon's unincorporated areas to the west. The 20,000-25,000 unincorporated town would produce sufficient wealth through property taxation and sales tax revenues to pay for County-provided services. Managed residential growth would support growth in commercial & light industrial businesses thus providing employment. That growth would support Grossmont UHSD's building of a high school on land it already owns.

All that transforms Alpine from a small town currently inordinately dependent on County support into a sustainable town in terms of wealth, and with substantially reduced need for transport "down the hill" westward to El Cajon, La Mesa and to San Diego for employment, schooling, shopping, recreation and employment.

The expanded Alpine very likely would meet the "Vehicle Miles Travelled" guideline being considered by the County as a means of attacking climate change.

May I respectfully request your consideration to guiding Development & Planning Services to consider current growth plans outlined in the Alpine Community Plan Update process? Alpine can support the County's strategic direction while becoming sustainable and able to contribute its greater financial support to the County while greatly reducing vehicle travel. Alpine can do its part to fight climate change through managed development.

Many thanks for taking the time to read this idea.

Very truly yours,

A handwritten signature in black ink that reads "George Barnett". The signature is fluid and cursive, with the first name "George" and last name "Barnett" clearly distinguishable.

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January 3, 2022

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**RE: Item 1, Jan. 7, 2022, Workshop on Vehicle Miles Traveled (VMT)  
Considering 13 Subjects Related to Implementing VMT During  
Environmental Review**

Dear Chairperson Edwards and Members of the Commission:

The staff report presents a comprehensive menu of options which tracks the list of items the Board sought direction on. Of necessity it is complex, and the number of choices is challenging. After receiving Board feedback, options could be consolidated into a small number of packages, each representing a particular policy emphasis. Staff's own recommendations would also be valuable.

Rather than comment on particularly choices, EHL will instead present considerations it believes should guide choices.

We urge the Commission to keep in mind that, relative to the cities, the unincorporated area is intrinsically unsuited for population growth, for reasons of infrastructure, services, wildlife habitat, and fire hazard *in addition to* high VMT. This has been recognized by SANDAG in its regional planning, RHNA, etc. County planning should retain a focus on economically viable rural uses, such as agriculture, and address farmworker housing.

The questions posed by the Board and addressed in the staff report deal with how to put more housing in the 'right' places, rather than with the larger problem of how to put less housing in the 'wrong' places. The latter is also extremely important, as the overarching problem is that the General Plan has far too much capacity – far beyond SANDAG growth projections or the County's RHNA – in high-VMT locations. Unless this problem is not addressed, whatever VMT benefits are achieved in low-VMT or infill locations will be more than negated by unrestricted growth in high-VMT locations. A comprehensive down-plan is a formidable step but should be considered. A *selective* down-plan, in locations that are in most need of, and most amendable to, down-planning is an alternative approach.

An area of future investigation is the fate of the Villages. Should the community plan process be completed, and currently planning density be built-out in walkable

communities, even if still with relatively high VMTs? Should semi-rural and rural locations, which have the highest VMT, be down-planned further? All that said, it makes sense to wait until the Smart Growth Alternative is formulated in the CAP Update to address the overcapacity problem.

As far as the options for infill and density increase, the staff report is clear that these locations, while often better, will *not* necessarily be true low-VMT locations (“most of these defined infill areas are not located within VMT efficient areas”). Thus, if infill and density increase are “screened-out” or otherwise facilitated by-right approval or overrides in a programmatic EIR, the areas facilitated should *selective and focused* rather than overly broad. “Buffer expansions” should be approached with caution. For example, a high-VMT location like Alpine is *not* appropriate for “by right” infill everywhere within its large “Village” boundary. One policy option is to limit screening-out or overrides to housing restricted to *low and moderate incomes*, unless located in VMT-efficient locations. (There is no significant shortage of market rate housing on a regional scale.)

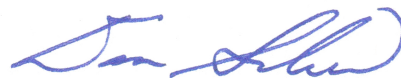
As a general but not absolute principle, EHL recommends programmatic EIRs rather than by-right programs. The former is more nuanced and allows more finely-tuned planning, and is sounder legally. Also, as the staff report notes, even with a by-right program, there would need for substantial analysis of non-housing factors.

We do not favor adding density in locations where future transit investment, such as transit hubs, is merely speculative. The actual result is likely to be more units in the wrong locations, as future transit investments are far more likely – and appropriately so – to be within municipalities. If unincorporated areas do receive transit investment, then that creates an opportunity to create a true TOD situation with concurrent up-planning.

Not given as much emphasis in the staff report, but with great potential in addressing both infill and the overcapacity of high-VMT locations, is the opportunity for the LOS/VMT process to create *incentives and disincentives*, so that actual construction of new units occurs more often in low-VMT and less often in high-VMT locations. A *sliding scale of mitigation* should be employed to implement this goal, with steep rises in rural and semi-rural locations compared to Village cores, infill sites, and low-VMT locations. Finally, due to the costs presented in the staff report, it makes sense to use the cities as the location for mitigation, through one of the options presented.

Thank you for considering our views.

With best wishes for the New Year,



Dan Silver  
Executive Director