The County of San Diego

Planning Commission Hearing Report

Date:	May 6, 2022	**Case/File No.:**	PDS2022-POD-22-003
Place:	County Conference Center 5520 Overland Avenue San Diego, CA 92123	**Project:**	Overview presentation of Phase 1 of the Sustainable Land Use Framework Project
Time:	9:00 a.m.	**Location:**	Various
Agenda Item:	2	**General Plan:**	Various
Appeal Status:	Approval by the Board of Supervisors	**Zoning:**	Various
Applicant/Owner:	County of San Diego	**Community:**	All
Environmental:	CEQA § 15162 through 15164 Addendum	**APNs:**	Various

A. OVERVIEW

The purpose of this Report is to provide information about the Sustainable Land Use Framework (Framework) that the Board recently directed staff to explore. This report will provide details on the background research, themes, planning mechanisms, and outreach conducted to inform a Framework for the County of San Diego.

On February 9, 2022, the Board of Supervisors (Board) directed staff to present options for consideration of a new land use framework. The Framework is intended to identify an effective land use approach or approaches within the unincorporated area that will assist in implementing various State mandates and local planning efforts that could be better aligned. These include State regulations related to reducing greenhouse gas emissions (GHGs), regional planning efforts, Board directed priorities related to sustainability, and meeting the County's Regional Housing Needs Allocation (RHNA). This information will be provided to the Board in phases. Staff will present to the Planning Commission an overview of the first phase of this effort.

The first phase was the research phase, which included best practice research, an assessment of the existing General Plan land use framework, a comparison of future implementation mechanisms (such as zoning overlays, specific plans, community plans, or updates to the General Plan), and an assessment of how to approach a parcel-by-parcel analysis and convene stakeholder groups to address the considerations that would facilitate development in VMT exempted areas at a later date. Based on Board input on the first phase, staff will be returning to the Board to present options for future development of a Framework for the unincorporated area and development of the parcel-by-parcel analysis. To date, staff has carried out a range of community engagement, including a public meeting noticed to over forty

thousand email subscribers, and small group feedback discussion sessions noticed to over 200 individuals representing diverse stakeholder groups. This Planning Commission Report and presentation are informed by the information and input collected to date through this community engagement.

This report includes a staff recommendation, a Project description, and an analysis and discussion. The Planning Commission has the option to (1) receive the presentation, (2) provide input that may be included in the report back to the Board, and (3) find the proposed recommendations exempt from California Environmental Quality Act (CEQA).

B. STAFF RECOMMENDATIONS

Based on its analysis, staff recommends that the Planning Commission take the following actions:

1. Find that the proposed actions are exempt from CEQA per Section 15061(b)(3) of the CEQA Guidelines because the proposed actions do not commit the County to any definitive course of action and there is no possibility that the activity in question may have a significant effect on the environment. Subsequent actions would be reviewed pursuant to CEQA and presented to the Board for consideration prior to implementation.

2. Receive the presentation for Phase 1 of the Sustainable Land Use Framework.

C. BACKGROUND

How to meet existing needs without compromising resources for future generations, or sustainable development, is an important policy consideration at all levels of government. Over the last several years, various State laws have been passed to help reduce California's environmental footprint and increase housing. On July 1, 2020, Senate Bill 743 (SB 743) became effective in the State of California. SB 743 changed how jurisdictions, including the County of San Diego (County), analyze transportation impacts from privately and publicly initiated projects under the CEQA. SB743 identified Vehicle Miles Traveled (VMT) as the standard to evaluate environmental impacts of development projects. Guidelines for implementation of SB743 were adopted in 2018 through new CEQA regulations. The guidelines are intended to balance the need to manage congestion, statewide goals related to infill development, transit investments, promotion of public health through active transportation, and reduction of greenhouse gas emissions.

Development of the unincorporated has historically been challenging and new VMT mitigation requirements are an additional constraint. Except for small projects and those in within VMT exempted areas close to existing infrastructure and transit, the cost to develop other types of housing projects in the unincorporated is likely to increase. It's anticipated this change will drive a shift in future growth to portions of the county that are closer to infrastructure, services, and transit. This raises questions regarding how to facilitate development in these areas, as well as how to ensure the unincorporated communities that will see less future growth will continue to thrive.

On February 9, 2022, staff presented the 13 items and options related to VMT analysis and mitigation programs. As part of that action, the Board directed staff to return with options for a Sustainable Land Use Framework (Framework) including a methodology for a parcel-by-parcel analysis in VMT exempted

areas. The first phase, the research phase, was intended to identify sustainable land use principles that could be considered to implement VMT in expanded "infill" areas and to identify long term sustainable land use strategies for the unincorporated area as a whole considering local, regional, and State laws, policies and regulations.

A sustainable land use framework is a policy framework that guides how and where growth should occur considering local, regional, and State laws, policies, and regulations. It can support healthy, thriving, and prosperous communities by:
- Addressing issues related to Green House Gas (GHG) emissions;
- Combining efforts related to transportation, housing, jobs, and reduction of GHGs;
- Building on and expanding work done to date related to climate action;
- Developing a comprehensive approach to community planning that will address quality of life issues, including ensuring the availability of services (i.e., infrastructure, amenities, and social services), and a variety of land uses (i.e., residential, and commercial), and economic development opportunities.

To better understand available tools and strategies for developing a sustainable land use framework for the unincorporated area, staff conducted research on best practices, including new approaches and principles related to land use, the environment, equity, and economic development.

Staff conducted best practice research through academic literature review, stakeholder feedback, and consideration of practices being implemented by other agencies. As a result, staff organized potential sustainable land use principles into four "themes." These themes reflect broad goals for a Framework that serve as the umbrella for multiple, more detailed principles. Each theme can be used to determine how future land use decisions can be evaluated or developed to address the issues identified above. These themes are further discussed later in this report.

Staff also actively engaged a variety of stakeholders to seek initial feedback on their thoughts related to the concepts of sustainability and development, if and how the two concepts work together, and their ideas for a safe, healthy, and vibrant community. Additionally, the parcel by parcel methodology proposes to look at factors that may affect development potential and ways to address them, such as (1) existing constraints like infrastructure and steep slopes, (2) opportunities such as underutilized property in unincorporated communities, and (3) additional policy considerations such as how not to exacerbate wildfire risk.

Staff began the first phase of Framework research and development with a review of the existing General Plan framework as a baseline, as well as other best practices research, plans adopted or underway since the General Plan was approved, and best practices. A phased approach to developing a new Framework will allow staff to bring forward sustainable land use principles for the Board's consideration and direction and provides an opportunity to discuss the roles of various planning mechanisms, including a potential General Plan Update, that could be pursued to bring together other active planning efforts and implement a sustainable approach to land use.

D. **ANALYSIS AND DISCUSSION**

Options to Inform Development of a Land Use Framework

Existing 2011 General Plan Model

A General Plan is a long-range planning document that guides the vision for the conservation and development of a jurisdiction. In California, cities, and counties are required by State law (Government Code Section 65300) to adopt a General Plan. A General Plan generally contains goals, policies, objectives, and implementation programs applicable within a 20 to 30-year horizon.

The County of San Diego's General Plan consists of eight (8) elements; Land Use, Circulation, Housing, Conservation, Open Space, Noise, Safety, and Environmental Justice. Each element contains policies and objectives that provide for a healthy, vibrant, and sustainable community for all persons of all income levels. The last comprehensive review and update of the County General Plan was adopted in August 2011.

The 2011 General Plan Update (2011 GPU) included a land use framework based on a Community Development Model (CDM), a land use approach unique to the County, which focused density around existing unincorporated community centers (termed "villages") which transition to semi-rural and rural areas outside of villages. Regionally, the CDM shifted density capacity from areas east of the County Water Authority (CWA) boundary (which are generally reliant on groundwater) to areas to the west, (which generally have water utility service). As part of this land use approach, three regional categories— Village, Semi-Rural, and Rural Lands, were established, each with a different character and land use development goals.

- **Villages:** planned for, the highest residential densities and zoning to facilitate compact development, a broad range of civic and commercial uses, and are focus areas for infrastructure investments, particularly transportation networks, active transportation options, water, and sewer.
- **Semi-Rural:** planned for lower-density residential, agriculture, and sometimes "legacy" commercial areas, supporting rural communities.
- **Rural:** planned for very low density residential, large open space areas, and agriculture. The Rural Lands Regional Category was also used to form "greenbelts" (largely undeveloped areas of agriculture, open space, and very low density rural residential) on the edges of communities to reinforce the identity and character of individual communities.

The 2011 GPU land use framework model was intended to reflect an environmentally sustainable approach to planning that balanced the need for adequate infrastructure, housing, and economic vitality while maintaining and preserving existing communities, agricultural areas, and open spaces. The compact development around a central core (Village) surrounded by areas of lower density, with densities/intensities decreasing further from the Village would have been most effective with the establishment of an extensive transit network, which still today does not exist in the unincorporated area. Development constraints including (i.e., sensitive habitats, wetlands, floodplains, steep slopes), existing development patterns, and decoupling of density from minimum lot size and consolidating development to the maximum extent possible were also considered as part of the 2011 GPU land use framework.

The 2011 GPU facilitated more clustered development projects by applying more flexible minimum lot size requirements with zoning and not dictating minimum lot sizes with General Plan land use designations. A clustered project can facilitate smaller residential lots close to infrastructure (particularly

fire protection infrastructure), existing development and clearing, and away from constrained areas. The remaining acreage of a project site can encompass larger lot(s) for consolidating preservation requirements and limiting the area of residences needing fire protection.

To consolidate development, the Conservation Subdivision Program (CSP) was established as part of the 2011 GPU. A Conservation Subdivision is required for subdivisions in the Semi-Rural 10 designation (SR10) and all Rural Lands designations. This program requires consolidating development to the maximum extent permitted by County regulations, with a minimum percentage of avoided resources (e.g., biological, agricultural, cultural, etc.) based on the applicable land use designation. The CSP further requires development footprints to maximize wildfire defensibility and habitat preservation, design roads to minimize environmental impacts, preserve large blocks of unfragmented and interconnected open space, and apply conservation easements for undeveloped areas. The 2011 GPU land use themes and approaches pre-date recent local, regional, and State regulations and policies related to VMT, reduction of GHGs, and the current housing crisis.

On February 9, 2022, the Board of Supervisors (Board) directed staff to present options for consideration of a new Framework that would identify an effective land use approach or approaches within the unincorporated area to assist in implementing State regulations related to reducing greenhouse gas emissions (GHGs), Board directed priorities related to sustainability, and in meeting the County's Regional Housing Needs Allocation (RHNA).

Trends and Themes- Research for a new Sustainable Land Use Framework (Framework)
On February 9th, 2022, the Board directed staff to identify principles for sustainable development that could inform future land use decisions. The purpose of developing principles is to establish guidance to use when considering where to allow for future growth in the unincorporated area in light of State regulations related to reducing greenhouse gas emissions (GHGs), regional planning efforts, Board directed priorities related to sustainability, and meeting the County's Regional Housing Needs Allocation (RHNA). Staff conducted best practice research through academic literature review, stakeholder feedback, and consideration of practices being implemented by other agencies, and have organized potential sustainable land use principles into four initial "themes." These themes reflect broad goals for a sustainable land use framework and are described in more detail below. The themes are essentially high-level vision statements that set aspirational goals through which policies could be generated to support the development of a sustainable land use framework for the unincorporated area. The themes can be used to determine how future land use decisions can be evaluated or developed to address the issues identified above.

Literature Review, Best Practices, and Stakeholder Feedback
To identify sustainable land use principles and themes, staff pursued four paths of research: general literature review, sustainable development best practices, existing County plans and policies, and stakeholder engagement. The general literature review included a review of planning guidance for sustainable growth from international agencies and organizations (e.g., the United Nation's Sustainable Development Goals, Intergovernmental Panel on Climate Change's Sixth Assessment Report - Climate Change 2022: Mitigation of Climate Change), federal agencies (e.g., the U.S. Environmental Protection Agency's Smart Growth in Small Towns and Rural Communities), the State of California (e.g., California Air Resources Board's Sustainable Communities Strategy, California Natural Resources Agency's 30x30

Framework, and Governor's Office of Planning and Research's Infill Development Guidelines), and public policy organizations (e.g., Brookings Institute's Rethinking Land Use, C40's Green and Thriving Neighborhoods Guidebook, Climate Action Campaign's Solving Sprawl: Building Housing for a Sustainable and Equitable San Diego).

In addition to review of the County's General Plan, staff reviewed best practices in sustainable land use by examining general plans, sustainability plans, and other relevant planning efforts from cities and counties that have recently updated or completed new plans. This included reviews of general plans from agencies in California including the cities of Oceanside, Rancho Cucamonga, and Napa, and the County of Ventura, as well as agencies outside of California including Maui County, Hawai'i. In reviewing best practices, staff considered common trends in recent planning efforts and innovative goals or policies that address sustainable land use practices.

A review of County plans and policies included identifying existing plans, policies, or programs within the County's Planning & Development Services (PDS) Department and Board guidance that support sustainable land use practices. These plans, policies, and initiatives were examined to understand how existing work supports the goals of a sustainable land use framework and can be used to develop themes that are inclusive and supportive of implementing State regulations related to reducing greenhouse gas emissions (GHGs), Board directed priorities related to sustainability, and meeting the County's Regional Housing Needs Allocation (RHNA). Relevant activities reviewed through this process include the 2011 General Plan; County long-range planning initiatives (e.g., 2018 Climate Action Plan (CAP), CAP Update, Multiple Species Conservation Program (MSCP)); the Board's Frameworks for our Future; LiveWell San Diego initiative; and Regional Decarbonization Framework. Staff also reviewed other adjacent planning initiatives such as the regional transportation planning efforts being led by San Diego Association of Governments (SANDAG) through the San Diego Forward: 2021 Regional Plan.

Staff also collected and reviewed stakeholder feedback from various outreach and engagement activities associated with ongoing County planning initiatives. This included feedback received from workshops and outreach events for the Sustainable Land Use Framework Phase 1, development of the CAP Update and Smart Growth Alternatives for inclusion in the Supplemental EIR, and Regional Decarbonization Framework. Through this outreach, the County has received feedback from community, economic, environmental, labor, and equity-based stakeholders, and more, relative to a variety of sustainable land use principles.

The following are some of the trends and themes that have emerged from the research that staff has conducted to date.

Sustainable Land Use Trends
Trends reflect common ideas, policies, or structures that are seen across the literature review and that are considered in best practices. The identified sustainable land use trends include principles and policies that emphasize the following values:

- Conservation and preservation. Conservation and preservation of natural resources, existing communities, and cultures such as indigenous peoples. New trends identified include

regenerative development which emphasizes the restoration of habitats and existing communities.

- Land use management. Growth management (i.e., ensuring services are available to support population growth), infill development, and creating "15-minute communities" (i.e., communities where all basic needs can be met within 15-minutes of travel).

- Climate action. Integration of climate action planning into land use plans. This includes programs, plans, and policies that reduce emissions of greenhouse gases, efforts to adapt to and combat climate change, and that create communities that are resilient to climate change impacts. Setting goals beyond State requirements (e.g., net-zero emissions targets), declaring climate change as a public emergency, and decarbonizing (i.e., completely removing sources of greenhouse gas emissions, to the extent feasible) the built environment.

- Economic development. Strong local economies and support for green jobs and industries. Planning efforts for small and rural communities emphasize community identity tied to economic identities such as agri- or eco-tourism. Workforce development and transition of economies to green jobs and industries.

- Environmental justice and equity. Just and equitable transitions, and sustainable development. Reducing pollutant exposure and health hazards, providing a range of housing options, practicing equitable outreach and engagement, and building anti-displacement policies into all planning efforts.

Identified Themes

To date staff has identified an initial list of four themes, each incorporating multiple principles and trends. These were developed based on research, trends, stakeholder input, and Board direction. Individually, each theme incorporates multiple principles and trends identified above with some overlap between each theme. The themes are in essence high-level vision statements that set aspirational goals through which policies could be generated to support the development of a sustainable land use framework for the unincorporated area. The four primary themes identified are:

- **Decarbonization of buildings and communities through policies and land use.**
  Reducing greenhouse gas emissions from the built environment (e.g., building energy use) and individual habits influenced by land uses (e.g., driving a gas-powered vehicle for commuting).

- **Reduce barriers for sustainable development and housing.**
  Reducing costs for the development of infill uses and housing to increase housing supply, affordability, and growth near existing services, and flexibility through permitting processes to allow for innovative green housing or land use practices.

- **Support innovative economies and infrastructure.**
  Building capacity for new industries and technologies by providing up-to-date infrastructure (e.g, transportation, utilities) that meets community demands, supporting existing communities and businesses, new green jobs and industries, and allowing flexibility in policies and programs to incorporate new and emerging technologies.

- **Conserve, protect, promote, and increase open space, natural habitats, resources, and agricultural lands.**
  Creating policies and programs that enforce protection and management of natural and working lands, focusing demand for future development away from greenfields (i.e., undeveloped lands

where services are not currently provided), high fire hazard areas, and agricultural lands, supporting eco- and agri-tourism, and increasing opportunities to access to open space for all residents.

These themes can be applied to land use practices in the County through a range of planning mechanisms at different scales (e.g., comprehensive, or focused general plan updates, updates to individual general plan policies or specific/community plans, and/or updates to the zoning ordinance, codes, and programs). A range of planning mechanisms will provide flexibility in how the themes are applied across the unincorporated area.

Planning Mechanisms Best Practices Research
A new Framework could be implemented through a variety of planning mechanisms. A range of planning mechanisms exists to inform, guide, and strategically impart land use policy and to address specific needs of communities. Planning mechanisms can be categorized into three types: policy, community, and implementation. Typically, policy and implementation planning mechanisms must be consistent with State law, environmental requirements, existing plans and zoning requirements. Therefore, implementing such mechanisms can be costly and take longer to develop.

Planning mechanisms exist for different purposes, from refining a specific vision of land use to addressing the needs of the underserved and underrepresented. Under each of the three categories of planning mechanisms (e.g., policy, community, and implementation), there are specific differences depending on the intended outcome, legal and resource requirements, and timeline expectations. The following provides a high-level overview of each planning mechanism.

The first category of planning mechanism, policy mechanisms, includes general plans, community plans, specific plans, and master plans. A general plan typically requires years to develop and significant resources to facilitate engagement and analysis. Community plans are policy and land use plans intended to supplement the general plan in a particular geographic area. These plans can cost roughly $1-4M and take 3-4 years to complete depending on scope and complexity and are typically updated every 20 years. Another policy planning mechanism is specific plans. Typically, specific plans are standalone planning and implementation documents, providing land use, design, and infrastructure planning for a specific geographic area within an identified boundary. Specific plans can streamline development projects that are determined to be consistent with environmental review. These plans can cost roughly $1-4M and take 3-4 years to complete depending on scope and complexity. The last mechanism under policy planning mechanisms is the master plan. This is a smaller more localized plan for a specific location or site requiring guidance for decisions related to public and private use of land and public facilities in a manner compatible with the land's character and adaptability to promote good stewardship of resources. A master plan can cost roughly $1-3M and take 3-4 years to complete depending on scope and complexity.

The second category, community mechanisms, includes three mechanisms that focus on specific community needs and visioning. The first, a neighborhood plan, is a policy-oriented vision document containing data and demographics, mapping, goals and objectives, and a list of future desired actions. Common for all mechanisms in this category, the community vision supports the general plan but does not typically include enforceable zoning regulations, development standards, or project conditioning

requirements. Since vision documents are aspirational and only include a list of future actions, they are considered "planning studies" not subject to environmental review. The second mechanism in the category, Community Needs Assessment (CNA), is a planning process intended to result in a deeper understanding of unique community needs through existing indicators (i.e., Healthy Places Index, Cal EnviroScreen, Live Well) using a multi-level quantitative assessment conducted in partnership with stakeholders to identify long-term planning solutions. The third mechanism, the Community Action Plan, builds on the CNA process and identifies solutions. It results in an action-oriented guide to reflect neighborhood priorities and to guide future decision making by both policymakers and the community to enhance and preserve the quality of life for area residents.

The third planning mechanism category, implementation mechanisms, includes other plans, regulations, and programs designed to turn policy and vision into action and guide the future land use. Consistent with the General Plan and authorities granted to the County, these tools contain standards and requirements applicable to projects and programs in the unincorporated area. There are generally two types of planning mechanisms in this category: plans and regulations.

The most widely used implementation planning mechanism is the Zoning Ordinance. The Zoning Ordinance regulates the location of unincorporated land uses and density, land development procedures, and administration of policy consistent with General Plan policies and land use designations. It's not uncommon for California jurisdictions to update their zoning ordinances concurrent or sequentially with general plan changes to ensure consistency. This can help streamline the planning and permitting process and reduce time and costs. Another important implementation planning mechanism is the Subdivision Ordinance found in the County Code of Regulatory Ordinances, which establishes subdivision design, project lot layout, improvement design, and project conditioning requirements consistent with the General Plan.

Other implementation planning mechanisms also have the potential to implement sustainable land use themes and policies including form based codes, objective design standards, and zoning overlays. These mechanisms can be applied across the unincorporated or specific to a planning area or community boundary as a component of a community plan or specific plan. The core organizing principle for form based codes is the emphasis on physical form rather than separation of uses. Objective design standards are similar but, specifically focus on removing subjectivity from the design review and permitting process by imposing standards that involve no personal or subjective judgment. Lastly, zoning overlays are a regulatory tool that can be used to streamline certain types of activities and projects within a planning area. Zoning overlays can be an effective tool to direct growth and establish requirements.

Applicability of Planning Mechanisms to the development of a Framework
These planning mechanisms can work together to implement both the Board and community visions. Implementation of the identified themes could include a combination of one or more planning mechanisms concurrently or in sequence. Strategic sequencing of planning mechanisms and updates to existing implementation tools will be an important part of implementing a Framework for the unincorporated area. The applicability of the planning mechanisms will be further discussed with the Board when staff returns to present options for future development of a Framework for the unincorporated area and development of the parcel-by-parcel analysis.

Methodologies for Parcel-by-Parcel Analysis

As a part of the Board direction on February 9, 2022, the Board directed staff to develop a methodology for a parcel-by-parcel analysis that would help facilitate development in VMT exempted areas at later date. The scope of the parcel-by-parcel analysis is to map out the type and location of development opportunities in VMT exempted areas within the unincorporated area in light of recent State law, regional planning efforts, and Board policy direction. The parcel-by-parcel analysis methodology would help to identify what areas may be appropriate for future growth and why they have not developed to date, as well as what steps could be taken to encourage development in these locations (i.e., construction of infrastructure, change in land use such as increased density, etc.). The goals of the parcel-by-parcel analysis are to provide more detailed information to the Board for making future land use decisions, and to provide certainty and opportunities for development in VMT exempted areas. Below is a discussion of recent policy direction related to the location of development, approaches used in similar mapping/analysis efforts in the past, and a recommended approach for a parcel-by-parcel analysis.

Recent State Law, Regional Planning efforts, and Board Policy Direction

Since the adoption of the County's most recent comprehensive update to the General Plan in 2011, actions taken at the state, regional, and local level have provided additional direction for how development should occur within the unincorporated area. The topics of climate change, wildfire, water, transportation, economic development, and housing affordability have informed new strategies for balancing sustainability and economic viability. These individual policy decisions, when taken together, have, in effect, produced areas of the unincorporated area that are either incentivized or disincentivized to develop.

To date, the County has not comprehensively analyzed these topics. In light of new regulations developed at the various levels of government, stakeholders and property owners have faced an uncertain landscape of where and how development can occur. Looking comprehensively at the effect of these newer requirements have on the development potential of individual parcels would provide data to inform the creation of incentives for development in areas that align with State, regional, and local priorities. The requirements and constraints can be mapped to show what areas may be ripe for streamlined development and related infrastructure investment. Additional parcel or area-level information could be provided along with the mapping data in a single "one stop shop" web-based interface for developers, landowners, investors, and the public. The goals of the parcel-by-parcel analysis are to provide more detailed information to the Board for making future land use decisions, and to provide certainty and opportunities for development in VMT exempted areas. This will entail analysis of vacant and redevelopable parcels in VMT efficient areas including underlying zoning and site constraints to determine development potential, available incentives, and potential land uses. Stakeholder input will be obtained during the analysis to assess the feasibility of development for the parcels identified. This approach will be presented to the Board for consideration and direction later this year.

Approaches to Parcel-by-Parcel Analysis

Below is a discussion of the dynamics of regional and localized mapping exercises, based on a review of similar mapping analysis conducted by the County.

- **Approaches Using Federal, State, and Regional Datasets**
  Regional datasets are commonly used for planning-level analyses, impact estimation, and forecasting. Much environmental mapping information is statewide or regional in scale. The

larger geographic extents of this kind of mapping data are characterized by generalized data that spans local jurisdictions. Examples of federal, state, or regional datasets include fire hazard severity zones, flood hazard areas, seismic hazards, or biological communities and are sourced from either modeled or regional data sources. Aggregated/generalized data is also useful for integrating into automated reporting processes, allowing for consistent, repeatable, and efficient reporting that is less prone to human-caused/data entry errors and that can be used by a host of different users. Interagency datasets are useful for policy making and estimating the potential impacts of various proposals/scenarios, but on their own, are insufficiently detailed to provide an accurate estimation of development feasibility for individual parcels. Development feasibility analyses require supplemental site-specific surveys or site-specific data sources.

The County commonly uses federal, State, and regional datasets as a visual reference in the review of development applications. This is the purpose of LUEG (Land Use and Environment Group) Geographic information System (GIS) online mapping application and mapping developed for projects such as the Property Specific Requests. These datasets are used to demonstrate factors likely to affect development within subareas of the county, which then planners/applicants supplement with more site-specific analyses and investigations. In limited cases, the County has integrated aspects of regional datasets into processes that estimate housing unit yields, two such examples include the 2011 General Plan Housing Model and the Housing Production and Capacity Portal (HPCP).

The 2011 General Plan Housing Model was used to evaluate the potential dwelling unit yield of land use patterns developed during the creation of the plan. These estimates were subregional in nature, however, and were used to compare dwelling unit yield and land use alternatives to each other rather than estimating development feasibility on individual parcels.

Similarly, the HPCP builds upon the work of the 2011 General Plan Housing Model to consider development constraints and housing yields at a subregional scale for the purpose of tracking remaining land use capacity at an unincorporated and subregional scale, but not at the parcel level due to data availability and interpretation complexities.

- **Housing Production and Capacity Portal**
  The HPCP tool, designed by LUEG GIS to track housing development activity against allowances established in the general plan, uses a series of datasets/maps to display information. The HPCP uses parcel-level information from Accela (one of PDS' data entry applications) to quantify housing development activity and then translate that information into a mapping format which also integrates regional constraint datasets as described above. While the final output of the HPCP is aggregated into 60-acre units, the entire process is repeatable, automated, and can be tracked over time with each update.

- **Previous Parcel-Level Analysis**
  The County has conducted detailed parcel-level analyses in the past. These have been for either limited areas or incorporated limited characteristics of the included parcels. One example is the County's Property Specific Request General Plan Amendment (2012-2020), which established a maximum theoretical General Plan density based on parcel size, ownership, and slope for

parcels within specified subareas of the unincorporated area. This analysis was then paired with regional analyses as a visual reference (as described above) to identify potential alternatives to the Board-directed density alternative.

A second example is the County's 2021 Housing Element update, which searched for parcels/sites that met certain criteria, including sites outside floodplains, outside environmentally sensitive areas, and within villages/transit areas. This information was combined with parcel-level information related to whether the site was developed or vacant. The outcome was parcels that met the identified criteria, but did not assess the feasibility of achieving planned densities. For this purpose, the 2021 Housing Element update used a standard multiplier of either 60% or 70% of the maximum theoretical General Plan density to estimate "feasible" unit yield. These percentages were based on guidance from the State and previous development application yields rather than a site-by-site analysis of constraints.

The County's 2021 Housing Element update analyzed implications of fire hazard (high, very high) and VMT ("VMT efficient" or not) against the qualifying housing sites discussed above to identify if rezoning would be required. In this case, both the physical (fire) and regulatory (VMT) factors had to be considered together to identify potential options. The selected factors were analyzed in different combinations to provide the Board a range of options with different implementation considerations in terms of time and cost. The Board selected criteria that met their intent without the need to undertake a lengthy rezoning process.

Recommended Approach

Based on the strengths and weaknesses of the approaches discussed above, staff prepared a methodology for a phased approach that provides stakeholder collaboration and deliverables at each phase, utilizing sequenced development and analysis of datasets (each building off the previous) to produce impactful deliverables at each phase while maximizing resource efficiency. Estimated durations for the proposed short- and mid-term approach are included below, while the timeframe for the most detailed, longest-term phase will depend on additional direction from the Board.

Short-Term (Six Months)

Within the first six months, staff will assess data resources available, consolidate information related to data and previous direction, prepare for and conduct initial stakeholder outreach, and prepare a public website as a "one stop shop" for information related to the effort.

- Consolidate established direction provided by the State, SANDAG, and Board regarding desirable and undesirable locations for housing.
- Identify relevant mapping/spatial data available as well as any data gaps/limitations.
- Identify geographic extent and level of detail of mapping/spatial data available.
- Create consolidated reference guide of regulations affecting the location of housing.
- Evaluate candidate local subareas within the unincorporated county to serve as a pilot area for parcel level analysis testing and select suitable local subarea.
- Conduct initial stakeholder outreach: discuss Board direction on Sustainable Land Use Framework as a whole, including the parcel-by-parcel analysis; establish stakeholder's

greatest needs in terms of certainty; and discuss additional methods to meet Board intent and stakeholder needs.

- Establish project website as a "one-stop shop", provide summary of public outreach, reference guide of regulations, and mapping resources electronically to the public.

Mid-Term (12 Months)

Within the first 12 months, staff will begin data analysis, prepare observations, conduct additional stakeholder outreach based on initial observations, prepare a summary report, and report back to the Planning Commission and the Board.

- Analyze regional physical and regulatory constraints affecting development.
- Identify alignment of constrained/unconstrained areas with Sustainable Land Use Themes.
- Identify geographic extent of existing and proposed incentive programs, alignment with Planning Mechanisms.
- Conduct parcel level analysis testing on the selected local subarea from Phase I and document findings.
- Conduct additional stakeholder outreach: present and explain available datasets and mapping, discuss advantages and limitations of data, establish linkages between opportunities and constraints in terms of stakeholder needs, explore ways data reporting can reflect "on the ground" needs of stakeholders (e.g., weighting) and ways the County can assist development in VMT exempted areas.
- Prepare summary report of data analyzed and initial findings of constrained/unconstrained areas; parcel level analysis pilot findings; stakeholder input received; tradeoffs of considering certain datasets together or separately; recommendations on geography to conduct detailed parcel analysis and expected outcomes.
- Report back to the Planning Commission and Board, receive direction on extent of detailed parcel analysis.

Long-Term: Detail Data Analysis (Over 12 Months, depending on direction)

Based on Board direction from the short- and mid-term actions and results, staff will prepare detailed data analysis, a comparison of the analysis to existing land use patterns and direction on the Sustainable Land Use Framework Themes, and summarize findings in a "road show" presentation. The timeline will be dependent on the extent of the detailed parcel analysis to be conducted.

- Conduct detailed parcel analysis for directed geography.
- Compare analysis to existing land use patterns and prepare observations on areas of alignment or conflict with the Sustainable Land Use Themes and Planning Mechanisms.
- Prepare draft "road show" presentation for the Planning Commission and Board.
- Present "road show" presentation, receive Planning Commission and Board input.

E. COMMUNITY PLANNING GROUP (CPG)

Engagement with Community Planning Groups took multiple forms: one general meeting with the Community Planning Group & Sponsor Group (CPG/SG) Chairs on March 19, 2022, an introductory Public

Meeting on March 24, 2022, and through small group meetings conducted (March 26, 2022-April 11, 2022) to discuss the project and gain the insight of stakeholders from various industry sectors and community planning groups.

Currently, the Framework Project is in Phase One (the conceptual research phase) and no CPG/SG recommendation was required at this time. However, at the CPG/SG Chairs meeting, various concepts like alternative transportation models, the impact of VMT on the MSCP, infrastructure needs, development, conservation, and the inter-relationships of current County projects that touch GHGs were discussed. County staff noted comments from the chairs and incorporated them into the Framework's research and development.

F. <u>PUBLIC INPUT</u>

Phase one of the Framework public engagement process started with an Introductory public meeting held on March 24, 2022. This meeting invitation was sent out to over 40,000 subscribers of PDS listserv subscription channels. It was attended by a variety of members throughout the incorporated area. Spanish interpretation services were available for anyone who might need them at the meeting, however, no members of the public requested these services. Interpretation services for all County threshold languages (Chinese Traditional, Filipino, Spanish, Arabic, and Vietnamese) were offered by request in the invitation sent out for the Public Meeting, translated into all threshold languages.

Next, a round of small group meetings was conducted (March 26, 2022- April 11, 2022) to discuss the project and gain the insight of stakeholders from various industry sectors like environmental advocates, affordable housing advocates, businesses, wildlife agencies, environmental justice organizations, community benefit organizations, labor unions, agriculture, commerce, building, land development, social equity, public agencies, professional organizations, universities, land trusts, and others. Throughout March and April of 2022, staff also met with the following specific groups: Tribal Chairs (March 15, 2022), the Land Development Technical Working Group (March 17, 2022), the Environmental Coalition (March 18, 2022), CPG/SCG Chairs (March 19, 2022), the Farm Bureau (April 5, 2022), California Department of Fish and Wildlife together with the United States Fish and Wildlife Service (April 14, 2022), and the Building Industry Association (May 12, 2022). The second round of small group meetings with various industry sectors is planned for late spring, 2022, and a second Public Meeting is planned for early summer, 2022. These meetings will be centered around a review of the themes that have been identified through the research and outreach process, as well as a review of the parcel-by-parcel methodology staff has developed.

Through the extensive public engagement efforts, various themes became apparent in the stakeholder feedback. These themes include sustainable land use practices, development and growth, green jobs, green infrastructure, and addressing the housing crisis. Related to housing, some of the participants in the small group meetings stated that the County should provide a variety of housing types in a variety of areas; explaining that not everyone wants to live in the same types of communities. Numerous other participants communicated the perspective that housing needs to be built near jobs. Additionally, related to sustainable land use practices, some of those engaged want the County to move beyond sustainability in the traditional sense, and start to think about regenerative development. Another successful outcome of the engagement process was the identification of numerous additional resources. Stakeholders

identified additional resources in the categories of best practices, case studies, local resources, and related efforts, as well as additional stakeholders we should be engaging. In the case of best practices and case studies, these additional resources were incorporated into our research efforts to develop themes and principles and will continue to be used throughout the framework development. For local resources and related efforts, the County's own MSCP was held up as a possible mechanism to implement sustainable land use practices, and staff received suggestions to combine and/or align our efforts with those of neighboring incorporated cities and large landowners and trusts. Many additional stakeholders were identified through the engagement process, including various commercial farming association contacts, specific large landowners, universities, State landholders, and local agencies. As additional stakeholders were identified, staff included them in the engagement process going forward.

G. CALIFORNIA ENVIRONMENTAL QUALITY ACT

The Framework is the first step in potentially modifying the General Plan. It is providing direction on policies with later actions to be analyzed under the California Environmental Quality Act (CEQA) and therefore, it is exempt from CEQA, pursuant to Section 15061(b)(3) of the CEQA Guidelines, as it would have no potential for resulting in a physical change to the environment, directly or indirectly. It can also be seen with certainty that there is no possibility that the Board's direction to initiate work on any of the proposed options may have a significant effect on the environment.

Furthermore, accepting these options for the Framework does not commit the County to any definitive course of action and would have no potential for resulting in significant physical change or effect on the environment directly or indirectly. Subsequent actions would be reviewed pursuant to CEQA and presented to the Board for consideration before implementation. Therefore, it can be seen with certainty that there is no possibility that today's actions may have a significant effect on the environment and that the actions are exempt or not subject to CEQA.

H. CONCLUSION

To develop options for a new Sustainable Land Use Framework staff conducted best practice research, an assessment of the existing General Plan land use framework, and a comparison of planning mechanisms that could be used to implement a new land use framework for the unincorporated area. Staff will be returning to the Board to present options for future development of a Framework for the unincorporated area and an approach for the parcel-by-parcel analysis. To date, staff have carried out a range of community engagement events, and will be holding more community meetings before taking the options and the methodology for a parcel-by-parcel analysis forward to the Board for consideration. The Planning Commission may choose to: (1) receive the presentation, (2) provide input included in the report back to the Board, and (3) find the proposed recommendations exempt from CEQA.

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N/A