

From: noreply@granicusideas.com
To: [Pallinger, David](#); [Barnhart, Douglas](#); [Calvo, Yolanda](#); [Hough, Tommy](#); [Ashman, Ronald](#); [Edwards, Michael \(LUEG\)](#); [Hitzke, Ginger](#); [Lynch, Dahvia](#); [LUEG, PDS.PlanningCommission](#); [Slovick, Mark](#); [Smith, Ashley](#); [Bray, Kelly](#); [Talleh, Rami](#)
Subject: [External] New eComment for Planning Commission Hearing
Date: Thursday, July 21, 2022 10:06:17 AM

LATE SUBMITTAL

JUL 21 2022

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New eComment for Planning Commission Hearing

Robert Krysak submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 7. Transportation Study Guide to Implement Vehicle Miles Traveled Analysis During Environmental Review in the Unincorporated Region (J. Armstrong)

eComment: It is unfair to impose an injustice on a large swath of the population. Ramona wants to be part of a solution, but in order to be part of the solution, we need to be incorporated into the plan. Growth in the backcountry and Ramona will be limited to support the expansion of mass transit elsewhere in the County. If our tax dollars are used to support mass transit, Ramona needs to be added to the mass transit plan, as there is presently no mass transit to Ramona.

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LATE SUBMITTAL

From: [Craig Jones](#)
To: [LUEG, PDS.PlanningCommission](#)
Subject: [External] Written testimony for San Diego County Planning Commission hearing, July 22, 2022, Item 7
Date: Wednesday, July 20, 2022 7:19:49 PM

JUL 21 2022

Received by the
San Diego County
Planning Commission

I cannot participate in the Planning Commission hearing; these comments are submitted for the County's record. Please confirm that this is transmitted to the members of the Planning Commission prior to the hearing.

The staff's proposal is abhorrent, and should be rejected. It takes what should be straight-forward in implementing State VMT regulations, and makes it horrendously complex and complicated, begging for abuse which will not achieve VMT reduction and will promote land use sprawl. With the County having just come off legal challenge on VMT regulation, this is begging for more litigation. Should the staff recommendations be approved, I will support such litigation.

It is also disgusting that the County has put out this 333 page staff report and proposal with inadequate time for public review and participation in crafting this crucial public policy.

There are so many swiss-cheese holes, exceptions and exemptions in staff's proposal that, again, this will result in not just public confusion, but abuse, thwarting reaching State objectives. Space here does not permit more detail but below are just a few of the shortcomings of staff's proposal.

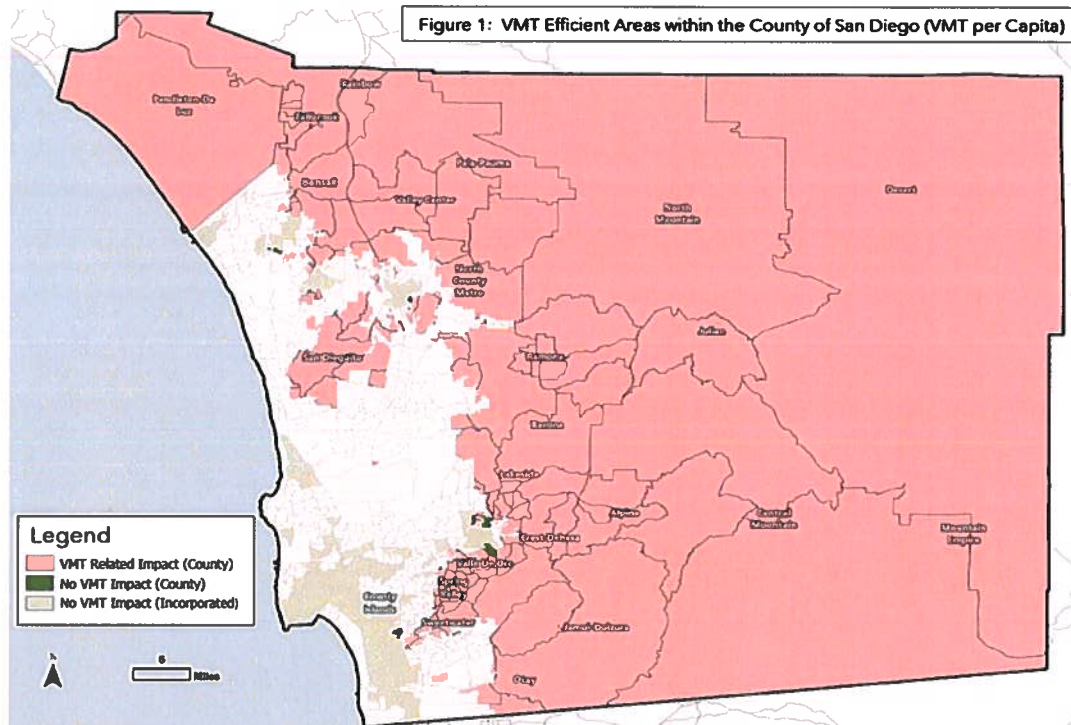
Regarding CEQA analysis of this proposal, I find the staff's reasoning of CEQA exemption to be tautological, circular reasoning: Staff basically asserts that implementation of their proposal would not result in significant impacts, therefore a CEQA exemption to adoption applies. If however what is proposed would result in significant effects, assertion of this exemption is faulty.

1 – County 'VMT Efficient Areas'

County staff report, "Proposal" pp. 7-6 – 7-7 et. seq. – states that revised VMT efficient assessment **pursuant to SANDAG Series 14 projections**, compared to Series 13, shows VMT efficient areas expanded: "The new SANDAG model also changed the geographic locations and boundaries of the VMT efficient area and Infill Areas . . . The new SANDAG model removed Borrego Springs as a VMT efficient location and added areas in Fallbrook and North County along the SR-78 freeway" **But: Per SANDAG itself**, ref. the below SANDAG map created from Series 14: Neither Borrego Springs, nor Fallbrook along I-15, are shown as VMT efficient. There are very small areas (green) shown as County VMT efficient. Contrast this with the vast VMT-exemption maps staff proposes. **The**

SANDAG map rather than the staff mappings should be used to denote efficient and inefficient VMT areas.

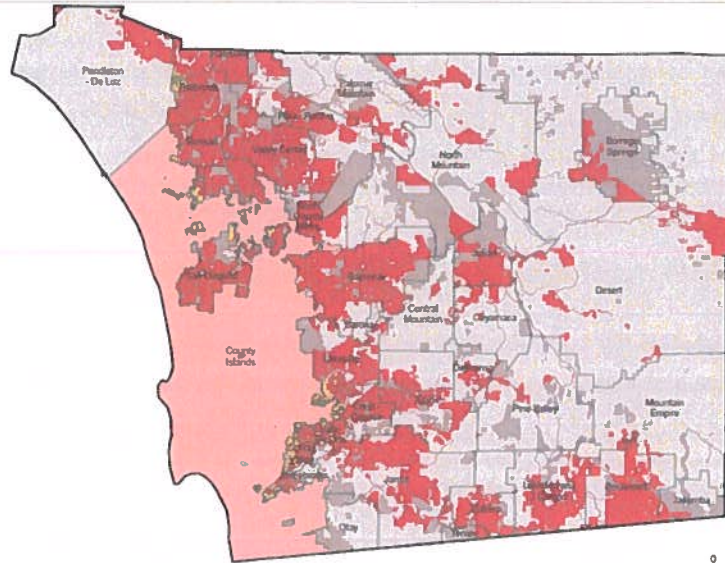
SANDAG mapping of "VMT efficient" from the most recent Series 14 forecast:



<!--[endif]-->

County staff mapping of "VMT efficient, supposedly based on Series 14 but with altered inputs:

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Legend

- At least 15% below the SANDAG Regional Average
- Above the SANDAG Regional Average
- San Diego County Incorporated Cities
- Community Plan Area
- 0% to 15% below the SANDAG Regional Average
- Not Enough Data
- SANDAG Region



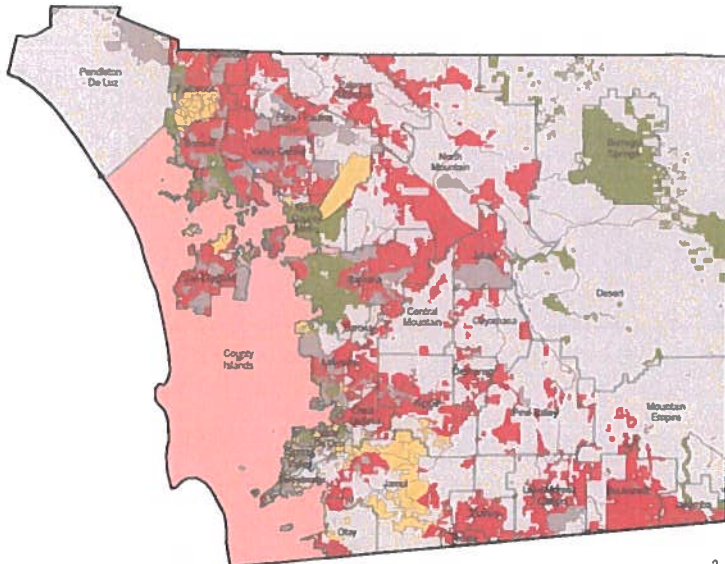
SANDAG Regional Average = 19.90 Vehicle Miles Traveled/Resident

San Diego County VMT Per Resident by TAZ Relative to SANDAG Regional Average*

*Based on the SANDAG ABM 2+ Regional Plan Base Year Model

May 9, 2022

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Legend

- At least 15% below the SANDAG Regional Average
- Above the SANDAG Regional Average
- San Diego County Incorporated Cities
- Community Plan Area
- 0% to 15% below the SANDAG Regional Average
- Not Enough Data
- SANDAG Region

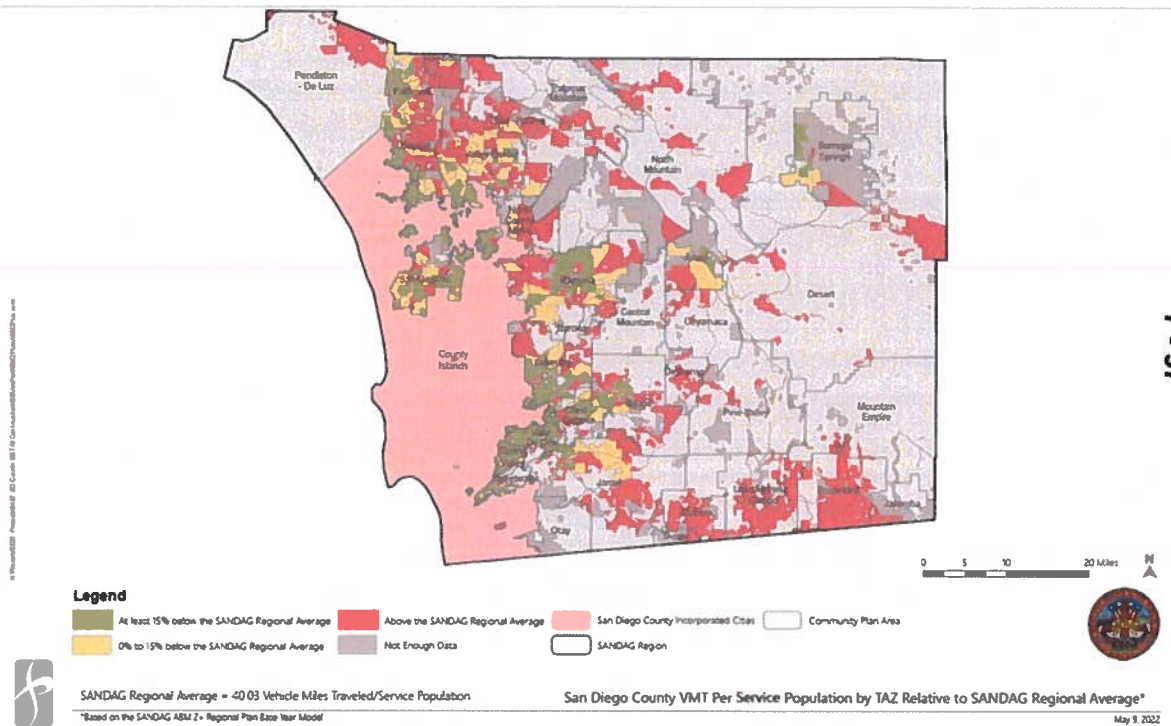


SANDAG Regional Average = 20.60 Vehicle Miles Traveled/Employee

San Diego County VMT Per Employee by TAZ Relative to SANDAG Regional Average*

*Based on the SANDAG ABM 2+ Regional Plan Base Year Model

May 9, 2022



2 – “100% Affordable Housing” pp. 7-9 et. seq. – The staff proposal **does not define what “affordable” is**. To meet State guidelines, an explicit definition is necessary BEFORE a transportation study guide is adopted. It must provide that at MINIMUM, all project units must be affordable to families at 80% AMI or lower, AND that 50% be affordable to 60% AMI or lower in any project.

3 – “Locally Serving Uses and Public Facilities” p. 7-8 et. seq. – The listing of uses here is vague in terms of the scope of some of the types; e.g. “government offices” could mean anything from a police sub-station or community-serving office, to a regional or sub-regional center such as that in El Cajon. “Schools” is likewise subject to abuse, with some educational institutions clearly able to draw from a much greater than just local use. Using the criterion of “outside the

vicinity of the use” (p. 7-58) is not clear, imprecise at best, leaving open the interpretation that the “vicinity” of the use is its own draw rather than the actual local area.

4 – “Exceptions for Other Types of Projects” p. 7-9 et. seq. – It should be obvious that the example of “wineries” is qualitatively and quantitatively different from standard agricultural food production; wineries are tantamount often to nearly theme parks, with extra-regional draw. Allowing the vague use of undefined “qualitative” assessment (p. 7-62) screams for abuse; there is no real reason why quantitative traffic modeling cannot establish any project’s actual VMT.

Craig Jones

858-354-1785

bananashke@sbcglobal.net



LATE SUBMITTAL

JUL 21 2022

**Received by the
San Diego County
Planning Commission**

July 21, 2022

Planning Commission
County of San Diego
Planning & Development Services
5510 Overland Avenue, Suite 110
San Diego, CA 92123

Re: Item 7: Transportation Study Guide to Implement Vehicle Miles Traveled Analysis

Honorable Chair and Planning Commissioners:

Thank you for providing the opportunity to comment on the proposed Transportation Study Guide (TSG) to implement Vehicle Miles Traveled (VMT) analysis. Like many other commenters, we have significant concerns about the County's approach to both screening and environmental review.

First, the County should proceed as soon as possible with the "Phase 2" environmental review of a mitigation program and include the proposed TSG screening criteria. Phase 2 should analyze screening in any areas the County determines as a policy matter will create a greater diversity of land uses that will support active transportation and future transit in the future to achieve the purposes of SB 743 to "more appropriately balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas emissions."

Although the staff report states that adoption of a threshold of significance is exempt from CEQA review, public comments raise concerns that the screening criteria proposed in the TSG does not comply with the requirements of CEQA, including that substantial evidence does not support a conclusion that a parcel's fire hazard severity designation affects its VMT efficiency, and undermines the same conclusion as to a parcel of equal efficiency outside a high or very high fire severity hazard zone. Several other commenters have also made claims that other screening thresholds are not supported by substantial evidence.

Although the County can make policy choices as to where it wants development, screening that is not based on substantial evidence to support the conclusion that a project meeting the criteria can be presumed to have less than significant impact requires a Program EIR that includes feasible mitigation and a statement of overriding considerations to implement the County's development policies. Additionally, since the County admits the proposed screening criteria in the TSG reflect its policy choices, the County should wait to make those choices until it fully understands what is feasible in the areas proposed to be screened out, by completing the parcel-by-parcel analysis directed by the Board. Otherwise, the County is making policy based on assumptions without knowing the facts.

We also have serious concerns that the TSG misses the opportunity to encourage efficient development in the County by ignoring VMT reductions that can be achieved by trip-capture within projects' unique mix of uses as well as by innovative trip-reduction measures not reflected in the extremely limited list of measures in Appendix G. By requiring that each use in a mixed-use project be separately analyzed the TSG ignores reductions

that can be achieved by a specific project that incorporates complimentary uses, not to mention co-benefits of reducing trips from existing residents that would have closer amenities brought by new development. Although the TSG states that the SANDAG model includes reductions for mixed uses, we have experience modeling projects using the SANDAG model that do not adequately reflect trip reductions for mixed-use. Additionally, although the TSG Appendix G lists only two measures that can be used to reduce VMT for residential projects, both of which are unlikely to be sufficient to reduce projects' VMT to below significance in the unincorporated County, research is showing that new ways to reduce VMT are being developed. The TSG should not limit the measures that a project can propose to reduce VMT based on its unique factors and incorporation of project-specific measures that can be demonstrated with substantial evidence to reduce VMT- it would be short-sighted for the County not to address these new ways that new development can reduce VMT and contribute to accomplishing SB 743's and the County's goals.

To address these concerns, we propose the Planning Commission adopt the following motion:

Motion

The Planning Commission recommends to the Board:

1. That the TSG be revised to eliminate the exception from screening in high and very high fire hazard severity zones and to include areas the County determines based on the parcel-by-parcel analysis will create a greater diversity of land uses that will support active transportation and future transit in the future to achieve the purposes of SB 743.
2. That the TSG be revised to allow projects to utilize project-specific VMT reduction measures and include reductions in VMT due to the project's mix of uses, based on substantial evidence.
3. That the County immediately initiate a Program EIR to analyze and proceed with adoption of the revised TSG and a Phase 2 Countywide mitigation program for VMT.

Thank you for your consideration,



Justin P. Schlaefli, PE TE

President

Urban Systems Associates, Inc.

LATE SUBMITTAL

JUL 22 2022

Received by the
San Diego County
Planning Commission

From: [Bill Tippetts](#)
To: [LUEG, PDS.PlanningCommission](#)
Cc: [Mike McCoy](#); [Gary Brown](#); [David Grubb](#); [Bee Mittermiller](#); [Duncan McFetridge](#)
Subject: [External] Planning Commission Hearing Item #7 (VMT)
Date: Thursday, July 21, 2022 7:01:05 PM

Dear Planning Commission:

The Southwest Wetlands Interpretive Association (SWIA) has submitted written comments to the County several times to address serious deficiencies that we believe have been or remain with the County's proposed SD 743 (VMT) Transportation Study Guidelines. Those comments are in the public record, and we are not reciting every point in our previous written testimony. Also, a SWIA representative has provided similar concerns - and recommendations to resolve those concerns - in several public Zoom meetings with PDS staff. While PDS staff, and its July 22 presentation note some of those concerns/objections, for the most part, our recommendations have not been acted on.

In brief, we support exempting all areas that meet the recently adopted regional VMT baseline (2160 housing units); we continue to oppose the blanket inclusion of "infill+Villages" areas as VMT exempt (3940 housing units) because the actual VMT/capita in some of those areas are well-above the regional VMT average that the County has now adopted as its baseline. While some of those areas may have average VMT/capita that are "relatively close" to the regional average and thus could be justified as exempt, the blanket exemption is not justified. Regardless that not all of the lots within those infill+Villages areas would be expected to be developed (per County briefings).

Also, all of the proposed VMT exemptions (including the small projects/110 ADT, 100% affordable developments, local serving, low VMT redevelopment, etc) are ADDITIVE to the 5870 housing units that are either in actually VMT efficient areas or within the blanket "infill+Villages" areas. The County has not provided an assessment of the cumulative housing exemptions that the current TSG would allow. Given that the County's current Regional Housing Needs Assessment calls for about 6,700 housing units for 2021-2029, allowing what is likely a larger number of housing units to be exempt from VMT analysis and mitigation is unsupportable, and obviously contradicts the intent of SB 743.

In addition, as discussed the California Air Pollution Control Officers Association (CAPCOA) manual, there are mitigation measures that are appropriate for rural areas: When considering which measures are applicable from the Handbook, the underlying reasons and context for reducing GHG emissions should be incorporated into the decision-making process. For example, if a user is seeking to achieve substantial GHG reductions to comply with a CEQA requirement, measures that have the greatest potential to reduce emissions may be most applicable. Or, if a city is aiming to implement a climate action plan by engaging the community, measures that inspire community members and are easily accessible and affordable may be the most applicable. Other factors for determining measure applicability include the project type, scale, and locational context. Some measures are broad and applicable to many types of projects (e.g., Measure E-2, *Require Energy Efficient Appliances*), while others have a narrower scope of application (e.g., Measure E-19, *Establish Methane Recovery in Wastewater Treatment Plants*).

Additionally, certain measures are suitable for urban environments, while others are best implemented in rural contexts.

In summary, we strongly disagree with the currently proposed VMT TSG and recommend that it be revised to more closely adhere to the intent and requirements of SB 743.

Sincerely,

Bill Tippetts (SWIA Board)

From: noreply@granicusideas.com
To: [Pallinger, David](#); [Barnhart, Douglas](#); [Calvo, Yolanda](#); [Hough, Tommy](#); [Ashman, Ronald](#); [Edwards, Michael \(LUEG\)](#); [Hitzke, Ginger](#); [Lynch, Dahvia](#); [LUEG, PDS.PlanningCommission](#); [Slovick, Mark](#); [Smith, Ashley](#); [Bray, Kelly](#); [Talleh, Rami](#)
Subject: [External] New eComment for Planning Commission Hearing
Date: Thursday, July 21, 2022 5:19:09 PM

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JUL 22 2022

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[SpeakUp](#)

New eComment for Planning Commission Hearing

Robert Stoodly submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 7. Transportation Study Guide to Implement Vehicle Miles Traveled Analysis During Environmental Review in the Unincorporated Region (J. Armstrong)

eComment: As a 20-year RUSD Trustee of <5000 students I ask that you reject the TSG until the issues of Rural Social-Economic Equity have been properly addressed. Ramona's economically disadvantaged population should be treated with the same equity of assistance as those of the same demographic but located in a more convenient VMT urban area. Ramona needs mass transit. It's impractical for a Ramona community member to ride public transportation for 3-hours to access employment, education, or recreation.

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Subject: [External] New eComment for Planning Commission Hearing
Date: Thursday, July 21, 2022 8:16:54 PM

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JUL 22 2022

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[SpeakUp](#)

New eComment for Planning Commission Hearing

Monica Garls submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 7. Transportation Study Guide to Implement Vehicle Miles Traveled Analysis During Environmental Review in the Unincorporated Region (J. Armstrong)

eComment: Spring Valley has been identified by the County as an Environmental Justice community due to air pollution from vehicles and a high rate of pedestrian & bike collisions. To designate Spring Valley as an infill area with no VMT mitigation requirement makes does not make sense, and it is unjust. I know we need housing, but I want Spring Valley to benefit from SB743 and VMT mitigation just like other parts of the County. Please add VMT mitigation requirements for EJ communities.

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Subject: [External] New eComment for Planning Commission Hearing
Date: Thursday, July 21, 2022 3:55:05 PM

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New eComment for Planning Commission Hearing

Steven Gelb submitted a new eComment.

Meeting: Planning Commission Hearing

Item: 7. Transportation Study Guide to Implement Vehicle Miles Traveled Analysis During Environmental Review in the Unincorporated Region (J. Armstrong)

eComment: The proposed guidelines are needlessly complex, contain exemptions and exceptions that would allow sprawl development, and therefore do not meet the intent of the state law. Implementation of this proposal is likely to increase land use sprawl, produce more greenhouse gas emissions, and fail to reduce VMT which is the law's purpose. I also want to add that given the complexity of the proposal the time allowed for public review prior to this meeting was not adequate.

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LATHAM & WATKINS LLP

LATE SUBMITTAL

June 7, 2022

Bruno Cavalieri
County Operations Center
Department of Planning and Development Services
5520 Overland Avenue
San Diego, CA 92123

Via Email: bruno.galvaocavalieri@sdcounty.ca.gov

RE: County of San Diego Transportation Study Guide Public Comment

Dear Mr. Cavalieri:

Thank you for the opportunity to comment on the Transportation Study Guide for the development of Vehicle Miles Traveled CEQA analysis in the County. We represent the Goodman Family, the owners of property in the Lakeside area of the unincorporated County. The Goodman's seek to develop a property owned by the family for decades and where the family has worked with the County's development services department for several years, with project submittals that pre-dates SB743. They now find their project subject to the requirements of an SB743 VMT analysis which could necessitate a full EIR for a relatively small project. The Project is a tentative map for 63 homes, in an area almost completely surrounded by existing homes and commercial development that is clearly an "in-fill" area. However, the project also falls within an island of high fire area on state maps, due to the topography and the fact that nothing has been built on the property. As discussed below, the proposed in-fill policy currently excludes in-fill areas that are also in very-high and high fire hazard areas. Although we agree that the County must be sensitive to development in mapped high fire severity zones, it should deal with those risks separately, and not couple fire hazards with VMT analysis.

Despite reductions in the amount of housing required in the County in the last SANDAG Regional Housing Needs Assessment ("RHNA"), thousands of units will need to be developed at all income levels in the next several years for the County to be compliant with the RHNA. In-fill areas are the most appropriate place for development in the County because they avoid the "leap-frog development" the County General Plan correctly discourages. In-fill follows the surrounding development pattern, making more efficient use of land instead of striking out to create islands of new development disconnected from other services, thus increasing VMT. In-fill development makes the most efficient use of County services such as libraries, schools, parks. In-fill development actually enhances emergency response by putting homes where efficient emergency response already occurs and providing more points of ingress and egress in

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San Diego, California 92130
Tel: +1.858.523.5400 Fax: +1.858.523.5450
www.lw.com

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already developed areas. Unfortunately, due to the historical suburban pattern of development and lack of public transit in San Diego, there are very few areas of the County that are VMT efficient. This is why a balance must be struck in the County to provide the housing that is called for in the RHNA, while developing land in the most efficient manner to minimize VMT.

Indeed, the legislative intent statement in SB743 states that the policy will, “[m]ore appropriately balance the needs of congestion management with statewide goals related to infill development.” The County TSG at section 3.1 notes that a main goal of SB743 is to encourage in-fill development, because it is the most VMT efficient area for growth. The TSG at page 14, notes that, “this shift in transportation impact focus [from LOS to VMT] is expected to better align transportation impact analysis and mitigation outcomes with the State’s goals to reduce GHG emissions, encourage infill development, and improve public health through more active transportation.” Therefore, coupling infill policies to an unrelated criteria like fire hazard will undermine the very basis for the policy shift in SB743 from level of service to VMT. We therefore, again ask that you decouple these two areas of analysis.

Fire hazard is an important data point for the analysis of any project, and we encourage the County to continue their robust analysis of these issues as part of the CEQA process. This is precisely why CEQA requires an analysis of fire hazards and evacuation routes as part of an initial study, negative declaration, MND or EIR. However, fire maps have no bearing on whether an area of San Diego County is VMT efficient, or should be allowed to develop because it meets the pattern of urban and suburban development in the County. This is illustrated by the fact that the TSG gives significant attention and analysis to the data that defines in-fill areas “including household density, intersection density, and job accessibility and areas within Transit Opportunity Areas (TOAs).”¹ However, the TSG provides no analysis as to why high fire maps would impact VMT or why fire maps are part of the in-fill criteria. The inclusion of fire maps as a metric to exclude areas which otherwise meet the in-fill criteria, seems isolated and detached from the more robust discussion of housing, jobs, and development patterns in the infill criteria. Neither the staff reports nor the TSG provide substantial evidence as to why fire maps were included in the in-fill criteria.

As noted above, due to the topography, climate, and vegetation communities in San Diego County, much of the urban developed area as well as undeveloped County is located in high and very high fire severity areas. Therefore, a compromise must be struck between the need for housing, the preservation of land and habitat, and the VMT efficiency needed to achieve our collective GHG reduction goals. Inconsistencies between infill areas that meet the data driven criteria for infill development and fire hazard areas occur in the unincorporated areas of 4S Ranch, Escondido, Lakeside, Spring Valley and Sweetwater. These areas, though, are recognized as the best areas for development in the County precisely because they are close to existing jobs, housing, and retail development, as well as Transit Opportunity Areas.

It is instructive to note that the City of San Diego’s Transportation Study Manual (“City TSM”) does not use fire maps as a screening criteria for VMT. In-fact, if high fire maps were

¹ TSG at page 23

used in the City TSM, many areas of the City located in or close to Transportation Priority Areas (“TPA”) in places like North Park, University City, and Mission Valley that are screened out of VMT analysis to encourage development in areas near major investments in transit infrastructure, would not be screened out, therefore discouraging development through extended time for CEQA analysis and the risk for litigation. The City’s TSM has correctly relied on proximity to transit, jobs, shopping and other housing to encourage infill development. Fire maps are not a criteria in VMT analysis in the City of San Diego. Fire issues are analyzed separately under CEQA. The County should follow suit.

As noted above, infill development is a central legislative intent for SB743 and a key strategy for reducing VMT, and the associated GHG emissions. Infill development was also a key strategy for reducing GHG emissions in SB375 – the Sustainable Communities Strategy. The CAPCOA Handbook for Analyzing Greenhouse Gas Emission Reductions (“CAPCOA Handbook”), states that “the goal of the SCS is to reduce regional vehicle miles traveled (VMT) through land use planning and transportation planning. SB 375 also includes provisions for streamlined CEQA review for some infill projects such as transit-oriented development (Institute for Local Government 2015).” The CAPCOA Handbook mitigation measures T-1 and T-2 rely on in-fill of employment and residential development as a GHG mitigation reduction strategy that can reduce VMT impacts by as much as 30%.² However, these mitigation strategies were not designed to overcome fire danger. The state and local governments have designed building codes, evacuation strategies, and other such policies to mitigate fire danger. Mixing the two areas of analysis negates the strategies that have been designed to deal with the impacts of each unique issue.

The following is a series of maps from the County’s interactive GIS mapping tool showing three areas which meet the infill criteria (in blue), but where adjacent areas are excluded from the infill category due to fire mapping. We have included both a map from the County’s interactive VMT tool and a fire map from the State of California GIS tool for fire, as the County staff had already removed the fire areas from the blue infill maps. The inconsistency between the data driven infill criteria and fire maps occur in areas where the County General Plan encourages development with Village Residential designations of 2 to 8 dwelling units per acre. The areas excluded from the infill criteria are clearly surrounded by urban development, but the fire maps create inconsistencies between neighboring properties and reduce infill development potential.

² CAPCOA Handbook at pages 70-75.

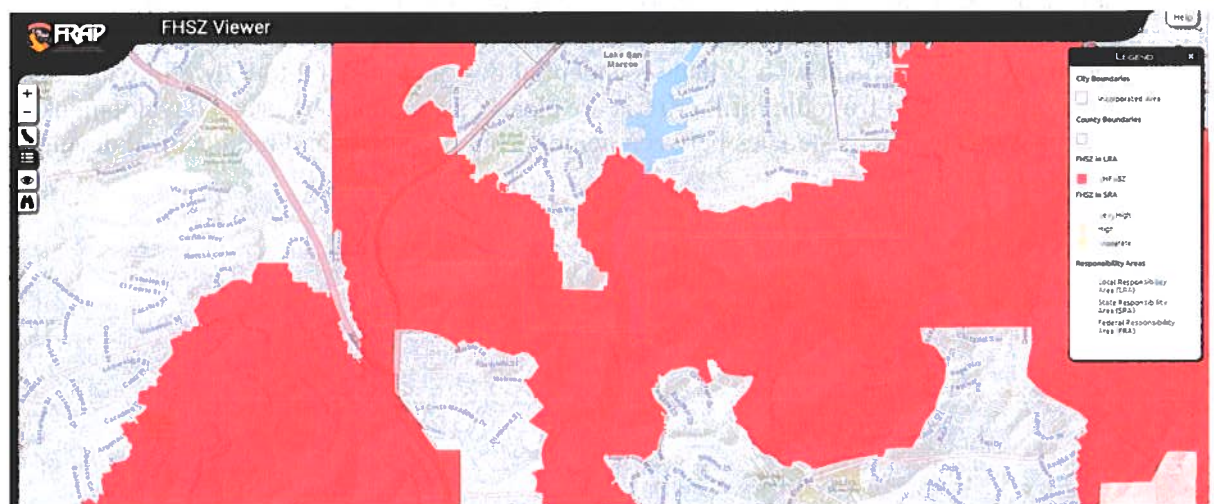
County of San Diego SB 743 Location-Based Screening Maps

Link to Transportation Study Guide

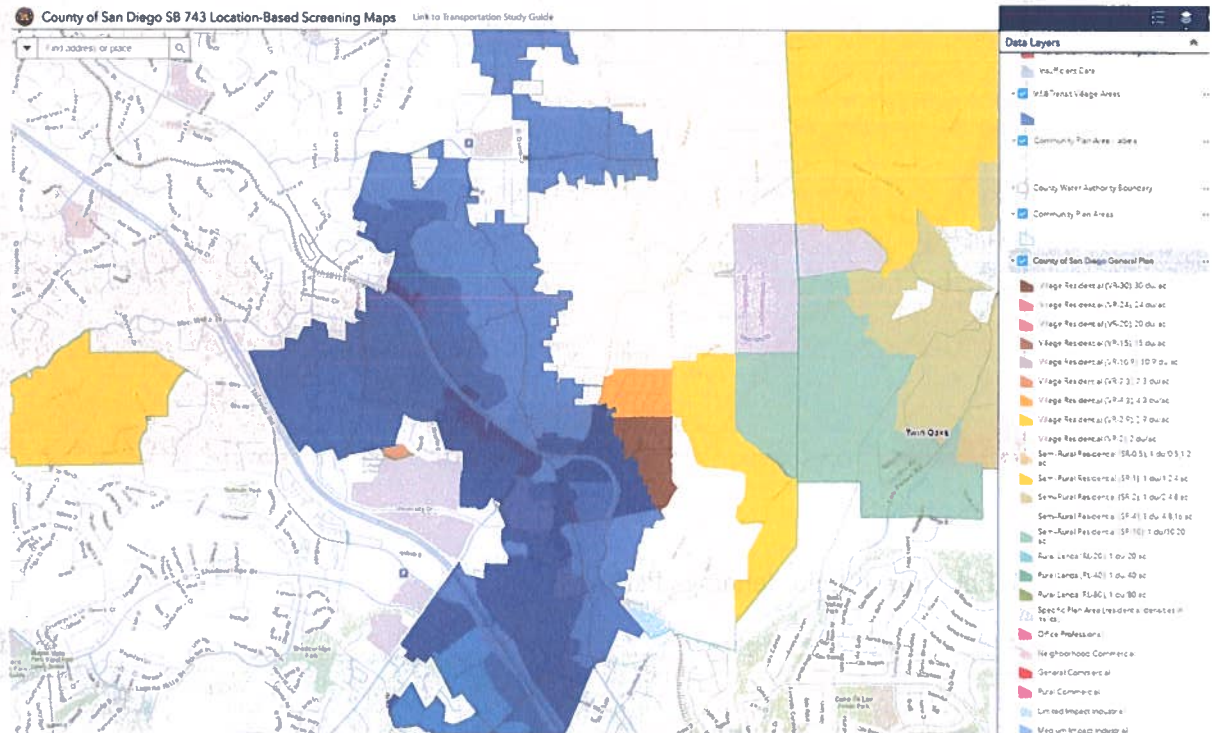
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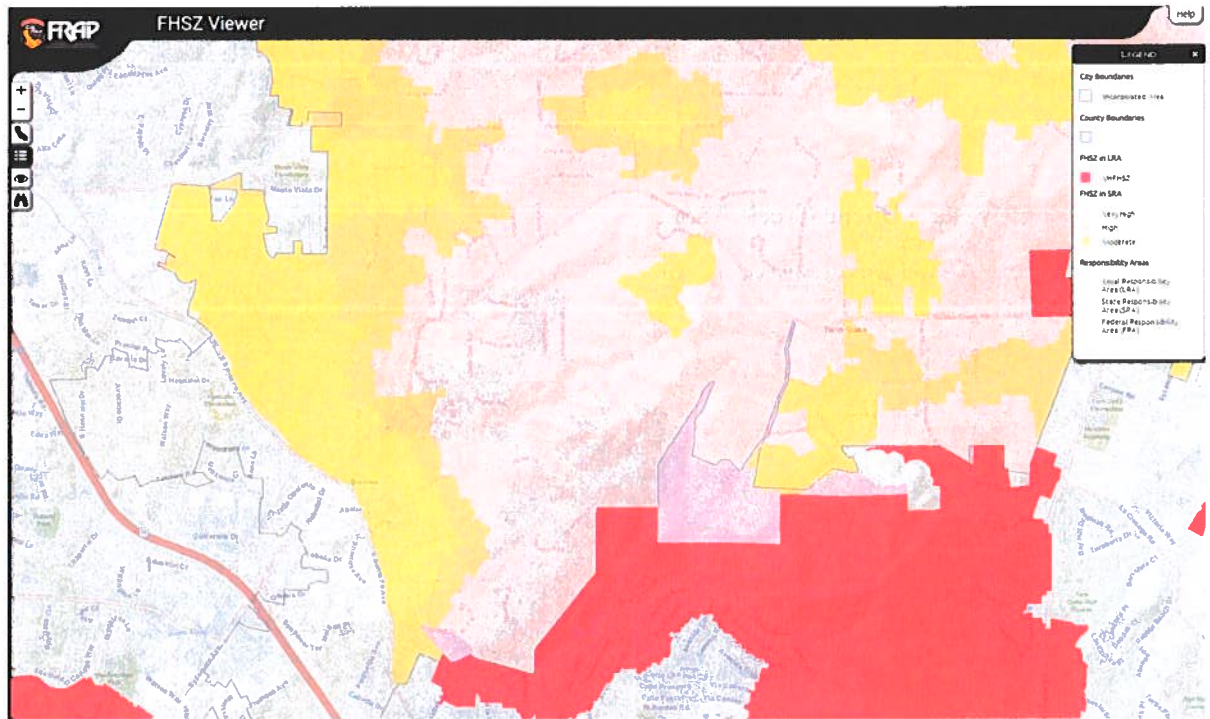
Map Layers

- Trails and Bikes
- Wild/Past/Village Area
- Community Parkways
- County Waterway Boundary
- Community Pathways
- County of San Diego General Plan
 - Village Residential (VR-20) 20 ac
 - Village Residential (VR-24) 24 ac
 - Village Residential (VR-20) 20 ac
 - Village Residential (VR-15) 15 ac
 - Village Residential (VR-10) 10 ac
 - Village Residential (VR-7) 7 ac
 - Village Residential (VR-3) 3 ac
 - Village Residential (VR-1) 1 ac
 - Village Residential (VR-2) 2 ac
 - Semi-Rural Residential (SR-1) 1 ac
 - Semi-Rural Residential (SR-2) 2 ac
 - Semi-Rural Residential (SR-3) 3 ac
 - Semi-Rural Residential (SR-4) 4 ac
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 - Semi-Rural Residential (SR-33) 33 ac
 - Semi-Rural Residential (SR-34) 34 ac
 - Semi-Rural Residential (SR-35) 35 ac
 - Semi-Rural Residential (SR-36) 36 ac
 - Semi-Rural Residential (SR-37) 37 ac
 - Semi-Rural Residential (SR-38) 38 ac
 - Semi-Rural Residential (SR-39) 39 ac
 - Semi-Rural Residential (SR-40) 40 ac
 - Semi-Rural Residential (SR-41) 41 ac
 - Semi-Rural Residential (SR-42) 42 ac
 - Semi-Rural Residential (SR-43) 43 ac
 - Semi-Rural Residential (SR-44) 44 ac
 - Semi-Rural Residential (SR-45) 45 ac
 - Semi-Rural Residential (SR-46) 46 ac
 - Semi-Rural Residential (SR-47) 47 ac
 - Semi-Rural Residential (SR-48) 48 ac
 - Semi-Rural Residential (SR-49) 49 ac
 - Semi-Rural Residential (SR-50) 50 ac
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 - Semi-Rural Residential (SR-52) 52 ac
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 - Semi-Rural Residential (SR-68) 68 ac
 - Semi-Rural Residential (SR-69) 69 ac
 - Semi-Rural Residential (SR-70) 70 ac
 - Semi-Rural Residential (SR-71) 71 ac
 - Semi-Rural Residential (SR-72) 72 ac
 - Semi-Rural Residential (SR-73) 73 ac
 - Semi-Rural Residential (SR-74) 74 ac
 - Semi-Rural Residential (SR-75) 75 ac
 - Semi-Rural Residential (SR-76) 76 ac
 - Semi-Rural Residential (SR-77) 77 ac
 - Semi-Rural Residential (SR-78) 78 ac
 - Semi-Rural Residential (SR-79) 79 ac
 - Semi-Rural Residential (SR-80) 80 ac
 - Semi-Rural Residential (SR-81) 81 ac
 - Semi-Rural Residential (SR-82) 82 ac
 - Semi-Rural Residential (SR-83) 83 ac
 - Semi-Rural Residential (SR-84) 84 ac
 - Semi-Rural Residential (SR-85) 85 ac
 - Semi-Rural Residential (SR-86) 86 ac
 - Semi-Rural Residential (SR-87) 87 ac
 - Semi-Rural Residential (SR-88) 88 ac
 - Semi-Rural Residential (SR-89) 89 ac
 - Semi-Rural Residential (SR-90) 90 ac
 - Semi-Rural Residential (SR-91) 91 ac
 - Semi-Rural Residential (SR-92) 92 ac
 - Semi-Rural Residential (SR-93) 93 ac
 - Semi-Rural Residential (SR-94) 94 ac
 - Semi-Rural Residential (SR-95) 95 ac
 - Semi-Rural Residential (SR-96) 96 ac
 - Semi-Rural Residential (SR-97) 97 ac
 - Semi-Rural Residential (SR-98) 98 ac
 - Semi-Rural Residential (SR-99) 99 ac
 - Semi-Rural Residential (SR-100) 100 ac

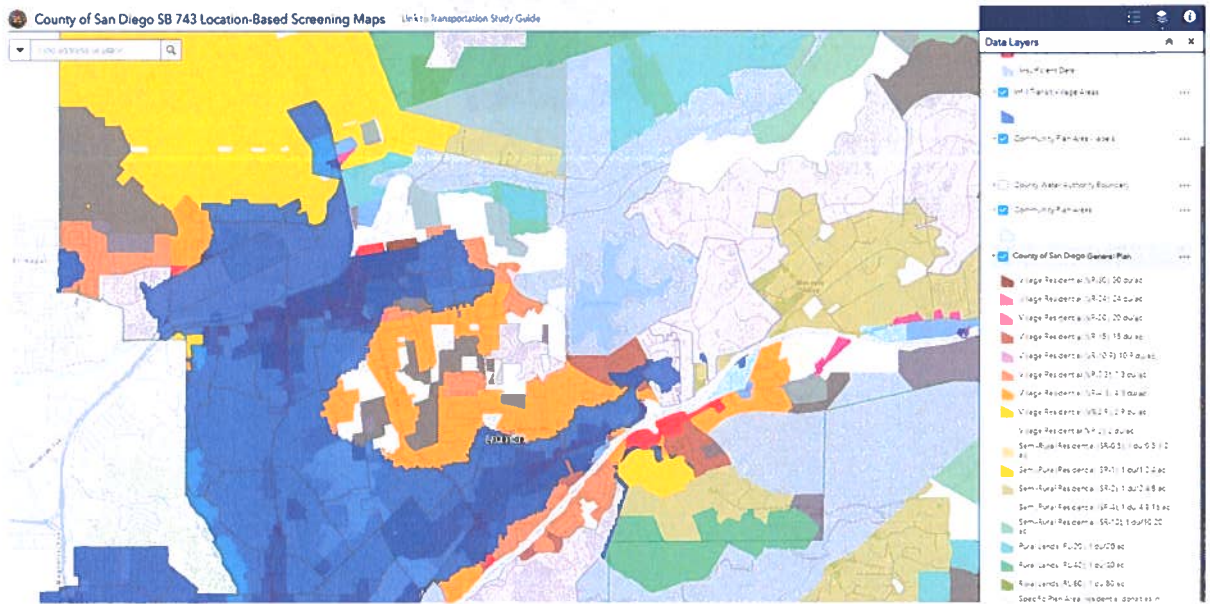


2. Vista – Buena Creek Area:





3. Lakeside at Lake Jennings Parkway:



LATHAM & WATKINS LLP



In conclusion, we would again emphasize that we do not disagree with the County being vigilant with respect to fire safety. However, we request that the County decouple the issue of fire safety from the VMT policy on in-fill development, so that each may be dealt with and mitigated separately. We appreciate your attention to this important matter and look forward to participating in this process.

Best regards,

Clifton B. Williams

Clifton B. Williams
Land Use Analyst
Latham & Watkins LLP

CC: County Board of Supervisors
Dana Goodman
Steve Goodman