

Cuyamaca CU-1

Recommendation

CSG – Rural Lands 40 (RL-40)

Staff – Rural Lands 40 & 80 (RL-40; RL-80)

Property Description

Property Owner:

Various

Property Size:

2,634 acres; 73 parcels

Location/Description:

Cuyamaca Subregional Plan Area;
Approx. 3.75+ miles west of Lake Cuyamaca;
Near Penstemon Road/Stoney Lane;
Outside County Water Authority boundary

Existing General Plan:

National Forest State Parks (1 DU/4, 8, 20 ac)

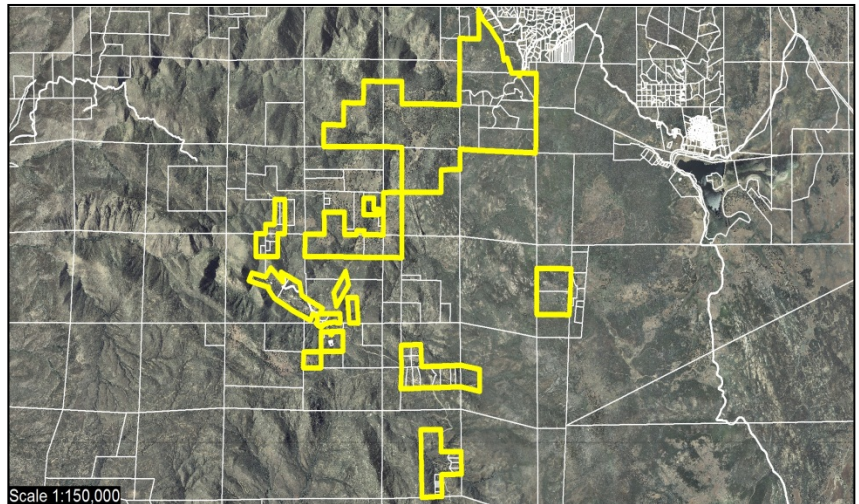
Travel Time (See Safety Element Table S-1):

Closest Fire Station — >20 minutes

Prevalence of Constraints (See following page):

● – high; ◐ – partially; ○ - none

- Steep Slope (Greater than 25%)
- Floodplain
- ◐ Wetlands
- Sensitive Habitat
- Agricultural Lands
- Fire Hazard Severity Zones



Aerial

Category	Recommendation	
	CSG	Staff
Designation	RL-40	RL-40; RL-80
Density	1 DU/40 ac	1 DU/40 ac 1 DU/80 ac
Maximum Potential Dwelling Units	94	82
Zoning Use Regulation	S92; A72	S92; A72
Lot Size (acres)	8 to 20 acres	8 to 20 acres
Spot Designation/Zone	No	No
Opposition Expected	Yes ^{1, 2}	Yes ³

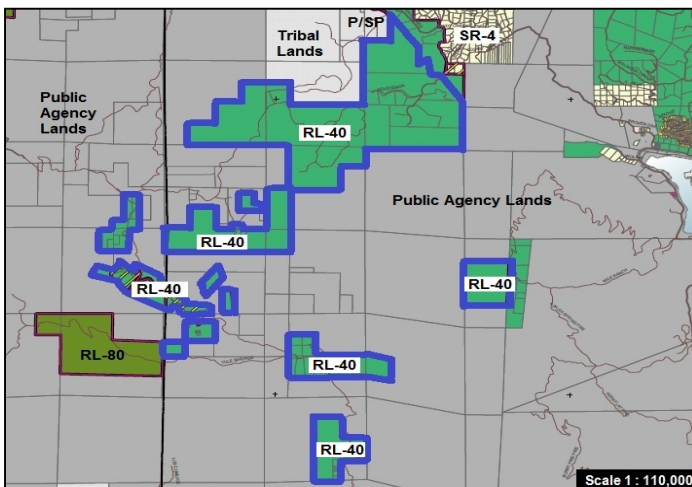
Notes:

1) U.S. Forest Service (see letter dated March 18, 2013)

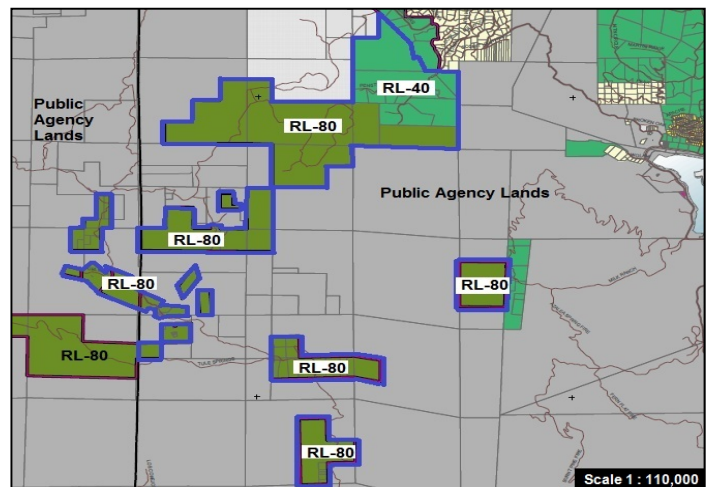
3) Endangered Habitats League (see letter dated March 18, 2013)

3) Property owner; Community Sponsor Group

Recommendations

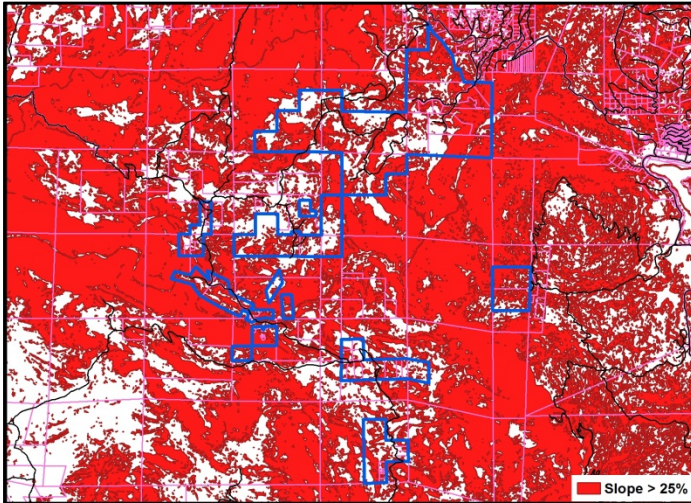


Draft Plan

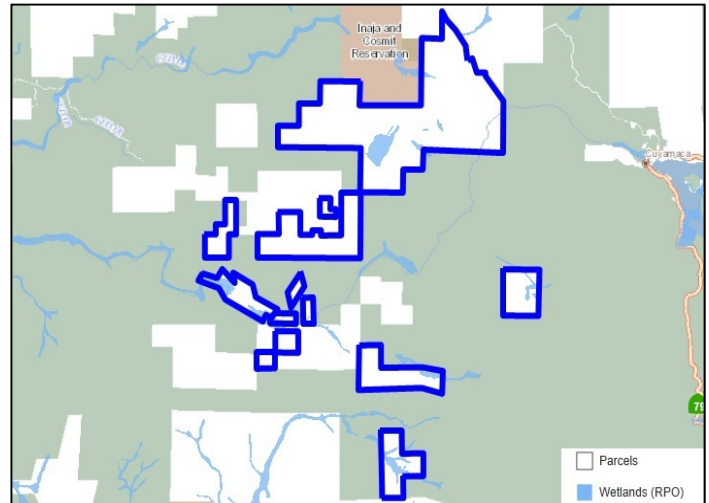


Staff Recommendation

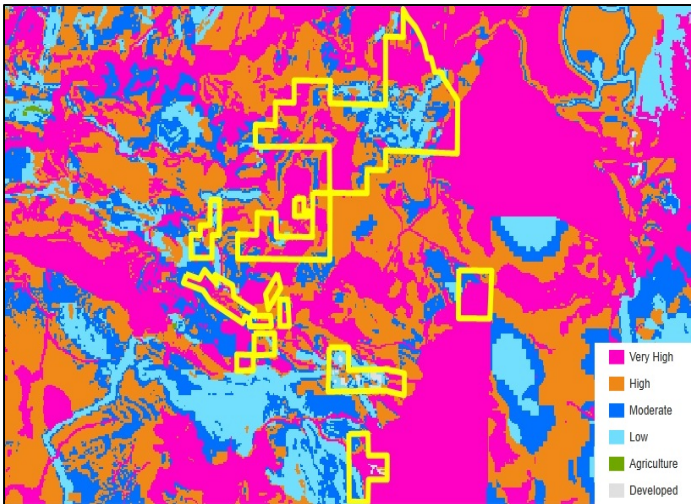
Cuyamaca CU-1



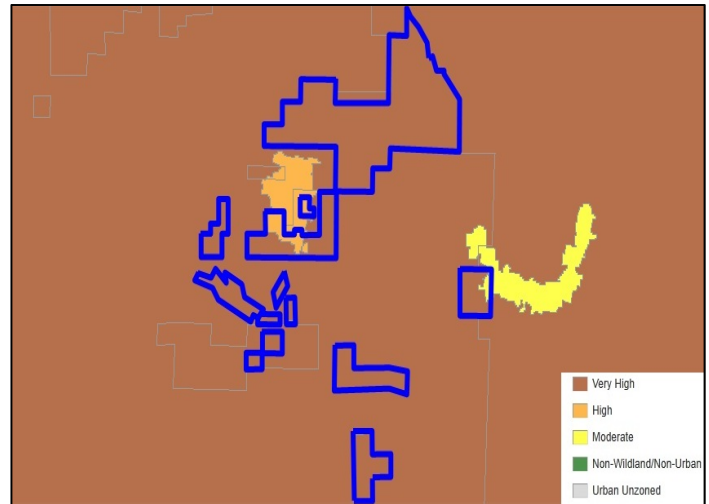
Steep Slope (Greater than 25%)



Wetlands



Habitat Evaluation Model



Fire Hazard Severity Zones

Context

Cuyamaca CU-1 contains 73 parcels totaling approximately 2,634 acres ranging in size from approximately three to 349 acres in the Central Mountain Subregion in an area straddling the portion represented by the Cuyamaca Sponsor Group and an unrepresented area. With the exception of the northeast corner, this entire area is surrounded by the Cleveland National Forest or undeveloped tribal lands. Boulder Creek Road traverses a portion of the area; however, most of the area is traversed by dead-end roads that exceed the County Fire Code standards. The adjacent National Forest lands are Inventoried Roadless Areas proposed to be preserved as Wilderness (as part of the Southern California National Forests Land Management Plan Amendment). The area contains approximately 125 acres of wetlands and most is composed of Very High and High Value habitat or slopes greater than 25 percent. Also, nearly the entire area is located within the Very High Fire Hazard Severity Zone and is 20 minutes or more away from the nearest fire station.

Staff Review: Rationale RL-80 Designations

- Minimize subdivision potential at interface with designated wilderness lands. Surrounded by area of Cleveland National Forest, which is proposed for a Wilderness designation (see letter from Cleveland National Forest dated March 18, 2013)
- Area is nearly constrained by steep slopes greater than 25% or Very High and High Value habitat areas
- Much of the area is only accessible by dead-end roads that exceed the minimum lengths allowed by the County Fire Code
- Consistent with how other similar areas within U.S. Forest Service lands are mapped, such as Julian to the north

Cuyamaca CU-1: Correspondence Received

Cuyamaca Community Sponsor Group reaffirmation for CSG recommendation

From: cuyamaca@nethere.com [mailto:cuyamaca@nethere.com]

Sent: Monday, March 18, 2013 4:52 PM

To: Fogg, Mindy

Subject: Re: FCI Lands Project

The Cuyamaca Sponsor Group at the March 15, 2013 meeting voted to reaffirm our vote regarding the draft SEIR. We support the proposed land use map for RL-40 within the Cuyamaca Sponsor Group area. The vote was 4-0.

Thank you, Kathy Goddard, Chair

U.S. Forest Service opposition to CSG recommendation

United States
Department of
Agriculture

Forest
Service

Cleveland National Forest
SO

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Suite 200
San Diego, CA 92127-2107
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(858) 673-6192 FAX
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File Code: 1560

Date: March 18, 2013

Mindy Fogg
County of San Diego, Planning and Development
Services
5510 Overland Avenue, Suite 110
San Diego, CA 92123

To the County of San Diego:

The Cleveland National Forest appreciates the opportunity to comment on the potential impacts of the proposed General Plan Amendment for the former Forest Conservation Initiative (FCI) lands. The Forest's comments include comments previously submitted during the scoping period, on the basis of a meeting with San Diego County staff and review of the proposed land use maps, as well as comments on the recently released Draft Supplemental Environmental Impact Report (SEIR). We will begin by highlighting key issues and management challenges related to urbanization that were described in detail in our 2005 Forest Land Management Plan. These issues are common to all former FCI lands and are central to the potential environmental and public health and safety issues associated with increasing population density within and adjacent to the Cleveland National Forest. Next, issues particular to specific mapped areas of the plan are addressed. Finally, comments specific to the SEIR are addressed at the end of this letter.

Altogether, we are concerned about the potential environmental and public health and safety impacts that would be associated with increases in population density on former FCI lands, and we feel that these impacts are neither adequately disclosed in the Draft SEIR nor consistent with the objectives of the County of San Diego General Plan. Finally, we feel that the best way to protect both the environment and public health and safety on these lands would be to select the Modified Project Alternative along with a provision that buffer zones be set aside between private lands and the Cleveland National Forest.

Comments Addressing all FCI Lands

The rapidly increasing population of Southern California, the growing level of development adjacent to the Cleveland National Forest, and the resulting effects on the National Forest System (NFS) lands present some of our main management challenges. Higher density development in more remote areas leads to more Wildland/Urban Interface area that is at risk of and in need of protection from wildland fire. The combination of increased development and the need to protect these developed areas from fire and other natural events, such as flooding, will put increasing pressure on National Forest managers to alter landscape character to accommodate these uses. In the case of fire, suppression efforts to protect communities can lead to the buildup of fuels and eventually to higher severity, more damaging fires than would occur naturally.

Furthermore, increasing the number of homes in an area increases the likelihood of human-caused fires, which can increase fire frequency to levels that harm ecosystems, wildlife, and waterways. Finally, we have concerns about the potential difficulty of evacuating people from remote subdivisions when wildland fires occur nearby on the Cleveland National Forest.

Urban development also puts pressure on public lands to provide urban support facilities (i.e. infrastructure) through special-use authorizations as private land options for development are exhausted. In the past, subdivisions have been established with the expectation that adjacent National Forest land can accommodate necessary water tanks, utilities, and defensible space to protect homes from wildfire. Instead, we now request that private lands be required to serve these purposes for future subdivisions through the blanket incorporation of buffer zones for new development projects on FCI lands. Along the same lines, where water delivery systems are not in place, the installation of wells for household use will lower the groundwater table beneath adjacent NFS lands, thereby degrading habitats for native plant and animal species. To avoid these impacts, we request that water delivery systems be established before enabling increased density on former FCI lands.

Road access presents several primary issues associated with increasing population density within or adjacent to the National Forest. The narrow, winding National Forest road system was built in the 1930s to support fire protection and does not meet typical County access standards. Moreover, the greater the population density of an area, the wider a suitable road would need to be. The National Forest roads generally lack rights-of-way where they cross private lands, which would need to be obtained in order to widen them or convey utilities. Furthermore, any improvements to Forest or County roads on the National Forest would require substantial planning and environmental compliance to be borne by project proponents, if permitted. Widening roads, building new roads, and increasing traffic to accommodate increasing population density in remote County areas would negatively impact plants and animals in a variety of ways, including direct mortality and habitat loss and fragmentation, and would also increase erosion and sedimentation of waterways.

Increased interface between developed private lands and National Forest boundaries also increases boundary management challenges including addressing occupancy trespass, clearly posting boundaries, and retaining clear title to NFS land. For example, in re-marking forest boundary after the 2007 fires, we discovered major encroachments adjacent to some subdivisions.

Another challenge associated with urbanization is the complex problem of National Forest access. For example, traditional points of public and administrative access to the National Forest have been lost as private land is subdivided. New landowners are often reluctant to accommodate access across their land. At the same time, residents living adjacent to the National Forests want convenient access, often resulting in the development of unplanned roads and trails. Unauthorized motorized vehicle use occurs and tends to be more of a management challenge on National Forest lands near private developments. As an example, illegal motor vehicle use of the Pacific Crest Trail has been reported from the Lake Morena area in the midst of the federally designated Hauser Wilderness.

Population growth within and surrounding the National Forests will probably be the single largest impact on National Forest recreation management in the foreseeable future. This growth has pushed urban development closer to and within the National Forest, in some cases directly adjacent to National Forest boundaries. Where NFS lands are or will be the boundary to this development, there will be pressure on these adjacent lands to provide diverse kinds of recreation. Higher density development would be expected to increase this pressure. Recreation on the National Forest is managed according to Recreation Opportunity Spectrum (ROS) to provide choices for people to recreate in settings that vary from urban to primitive. In general, the Forest Service would prefer zoning on adjacent private lands to be complementary with the land use zone and ROS on the NFS land. For example, where there is interface between private lands and NFS lands within a designated wilderness area or Inventoried Roadless Area, lower density County zoning would be the more complementary. Solitude, an increasingly rare opportunity, is a desirable feature in wilderness, but would be difficult or impossible to retain in the face of the increasing population and high density development.

Extensive habitat conservation planning efforts led by local government and conservation organizations have identified the need to maintain an inter-connected network of undeveloped areas or landscape linkages, which retain specific habitats and allow for maintenance of biodiversity and wildlife movement across the landscape and led to development of several multi-species habitat conservation plans. National Forest System lands are a core element of this natural open space network and will play an increasingly important role as additional habitat fragmentation occurs on surrounding private lands. Fragmentation is the breaking up of contiguous blocks of habitat by urban development features into progressively smaller patches that are increasingly isolated from one another and of less value for conservation. Higher density zoning allows for a higher level of development and, accordingly, fragmentation. Habitat loss and fragmentation are the leading causes of species extinctions, and the Cleveland National Forest has many populations of federally-listed threatened and endangered species that could be affected by increasing population density on former FCI lands. Meanwhile, invasive species generally enter new areas through human activity in those areas, and so increasing population density would result in the introduction of new infestations that would damage Forest resources and be costly to manage.

Comments Specific to Particular Locations

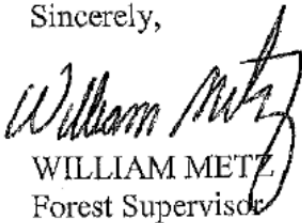
- **Areas west of Cuyamaca CPA.** The Forest supports RL-80 zoning for parcels adjacent to the Cuyamaca CPA along Boulder Creek Road. These parcels are located in a very undeveloped and fire prone part of the Cleveland National Forest and are adjacent to Inventoried Roadless Areas (IRAs) that are proposed for recommended wilderness status in the Southern California National Forests Land Management Plan Amendment project.

Conclusion

We appreciate the development and consideration of the Modified Project (Environmentally Superior) Alternative as described in Chapter 4.3. The sacrifice of less than 10% of the residential dwelling units of the proposed project would certainly be worth the resultant protection of resource conditions and reduction of wildfire risk to communities. Moreover, the areas where the lower densities would be located, as specified in the Modified Project Alternative, are precisely the areas where resource and wildfire concerns are greatest. As a result, we strongly support the adoption of the Modified Project Alternative rather than the Proposed Project. In addition, we encourage the County to set aside buffer zones between private and NFS lands to protect the environment and public health and safety and reduce conflict between adjacent land uses.

To conclude, we appreciate the consideration that you have given to our past concerns about this project and hope that you give similar consideration to our concerns about the Draft SEIR. We are very interested in working with the County of San Diego to achieve the objectives of the project that address environmental sustainability and risk avoidance. Thank you for the opportunity to comment on the potential impacts of the proposed project for the former FCI lands in the unincorporated areas of San Diego County. If you have any questions about these comments, please contact Jeff Heys, Forest Planner, at (858) 674-2959.

Sincerely,



WILLIAM METZ
Forest Supervisor

cc: Gloria Silva

Endangered Habitats League opposition to CSG recommendation

March 18, 2013

VIA ELECTRONIC MAIL

Mindy Fogg
Dept. of Planning and Development Services
County of San Diego
5510 Overland Avenue, Suite 110
San Diego, CA 92123
mindy.fogg@sdcounty.ca.gov

**RE: GPA 12-004; Forest Conservation Initiative (FCI) Lands General Plan
Amendment (GPA) – Map Comments**

Dear Ms. Fogg:

The Endangered Habitats League (EHL) appreciates the opportunity to supplement its main comment letter (submitted under separate cover) with these comments on specific map issues. For your reference, EHL is Southern California's only regional conservation group and has been a stakeholder in County of San Diego planning efforts since 1993, serving on advisory committees for the MSCPs and the General Plan Update.

As a rule, the *lowest* rural densities should be applied to former FCI lands. Because these forest inholdings are often the most remote, most poorly served by infrastructure and services, most hazardous for fire, most GHG-intensive for auto use, and most ecologically intact, the Guiding Principles¹ direct development elsewhere. The

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- . Support a reasonable share of projected regional population growth.
- . Promote health and sustainability by locating new growth near existing and planned infrastructure, services, and jobs in a compact pattern of development.
- . Reinforce the vitality, local economy, and individual character of existing communities when planning new housing, employment, and recreational opportunities.
- . Promote environmental stewardship that protects the range of natural resources and habitats that uniquely define the County's character and ecological importance.
- . Ensure that development accounts for physical constraints and the natural hazards of the land.
- . Provide and support a multi-modal transportation network that enhances connectivity and supports community development patterns and, when appropriate, plan for development which supports public transportation.
- . Maintain environmentally sustainable communities and reduce greenhouse gas emissions that contribute to climate change.

former FCI lands exemplify the need to strictly limit “rural residential” subdivision so that the Guiding Principles are achieved and taxpayer subsidies for far-flung scattered housing are minimized. That said, the GPA has to respect areas of *existing* parcelization with appropriate designations. But additional subdivision outside of established rural residential enclaves should be avoided.

We are also concerned that development – commercial or residential – not “leapfrog” outside of existing villages and water and sewer boundaries. For example, casino facilities – sited without regard to the Guiding Principles – should not trigger such leapfrog.

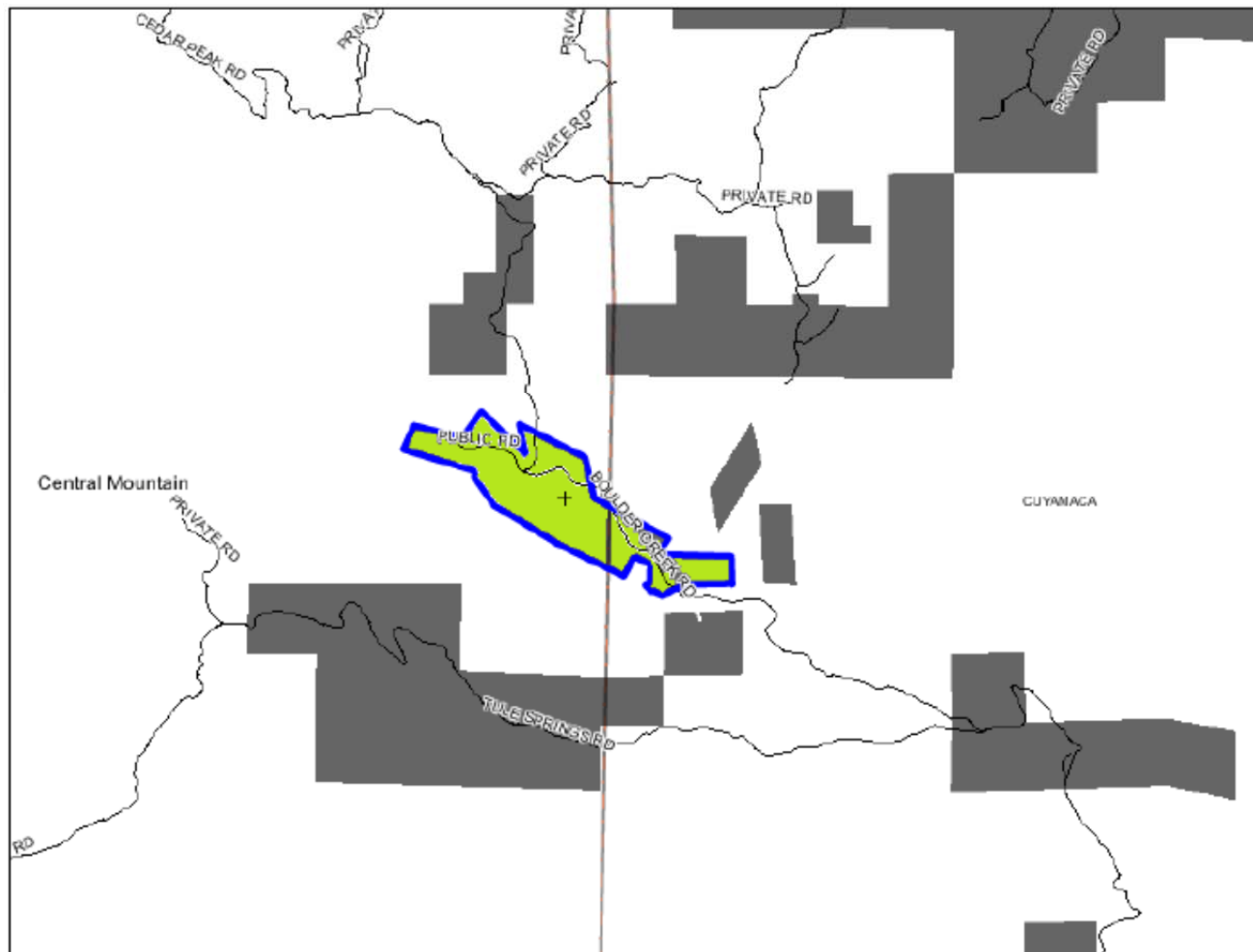
In general, EHL supports the Environmentally Superior (“Modified”) Alternative. The purpose of these comments is to highlight those select areas where we find the Modified Alternative is deficient in meeting the Guiding Principles. Narrative comments below refer to enclosed exhibits.

Central Mountain - Cuyamaca

There is a remote area which, on the basis of consistency with nearby parcels *alone*, should be RL80 rather than RL40.

Central Mountain-Cuyamaca

This land, located along Boulder Creek Road, is shown as RL40 in the proposed project and the Modified Project Alternative. However, the Modified Project Alternative has the surrounding FCI projects as RL80, which should also be the case here.



We look forward to continuing to work with the Department on this very important General Plan amendment.

Yours truly,

Dan Silver, MD
Executive Director