

## Pendleton-DeLuz 1

### Recommendation

Draft Plan – Rural Lands 40 (RL-40)

Staff – Rural Lands 80 (RL-80)

### Property Description

#### Property Owner:

16 different owners

#### Property Size:

1,003 acres; 18 parcels

#### Location/Description:

Pendleton-DeLuz Community Plan Area;  
North of Camp Pendleton near Orange County;  
Near Santa Margarita Road/Tanaja Truck Trail;  
Outside County Water Authority boundary

#### Existing General Plan:

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

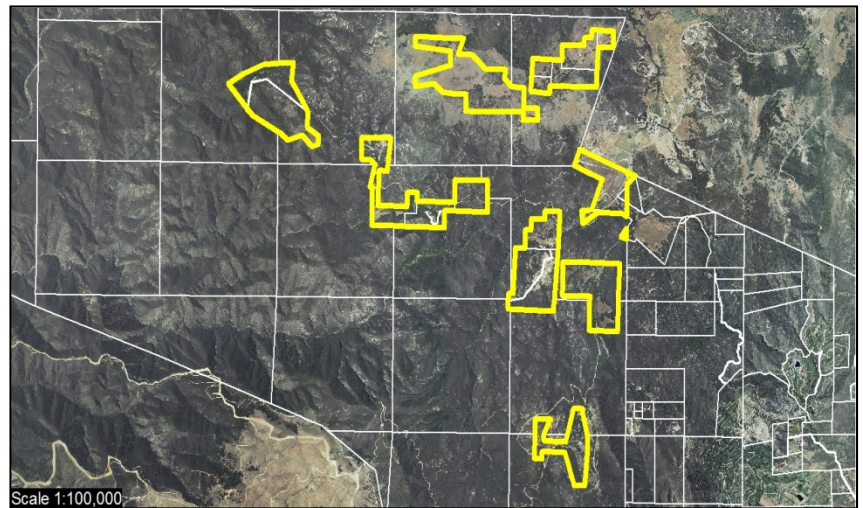
#### Travel Time (See Safety Element Table S-1):

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



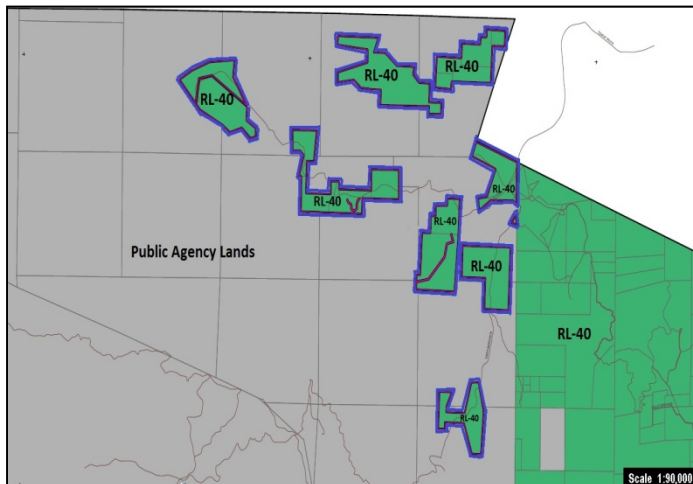
Aerial

Category	Recommendation	
	Draft Plan	Staff
Designation	RL-40	RL-80
Density	1 DU/40 ac	1 DU/80 ac
Maximum Potential Dwelling Units	24	18
Zoning Use Regulation	A72	A72
Lot Size (acres)	4	4
Spot Designation/Zone	No	No
Opposition Expected	Yes <sup>1</sup>	No

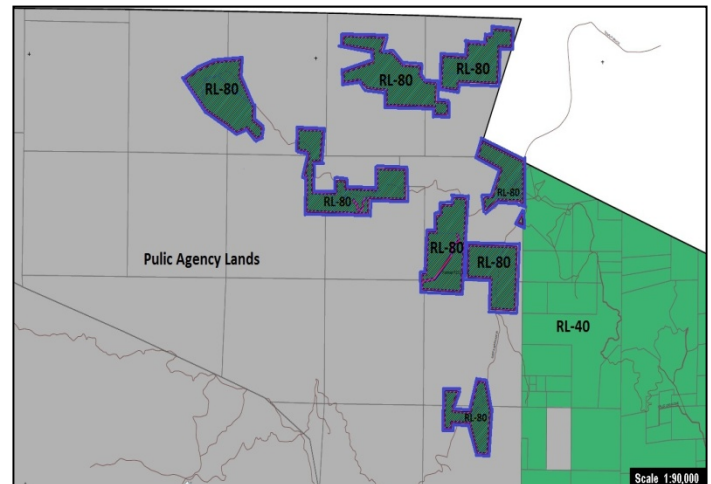
#### Notes:

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

## Recommendations

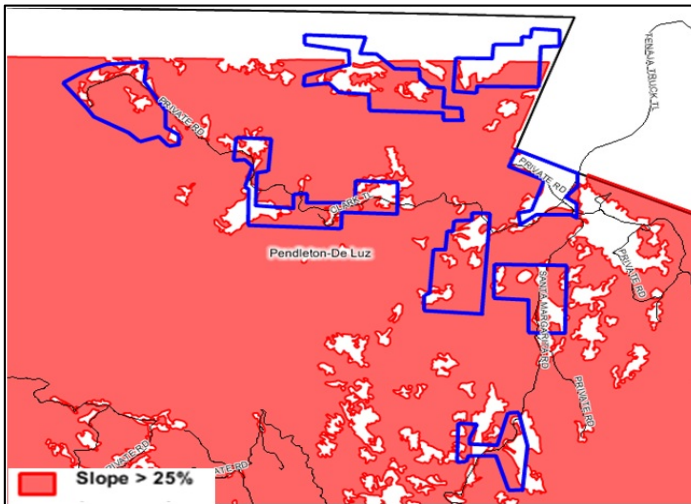


Draft Plan

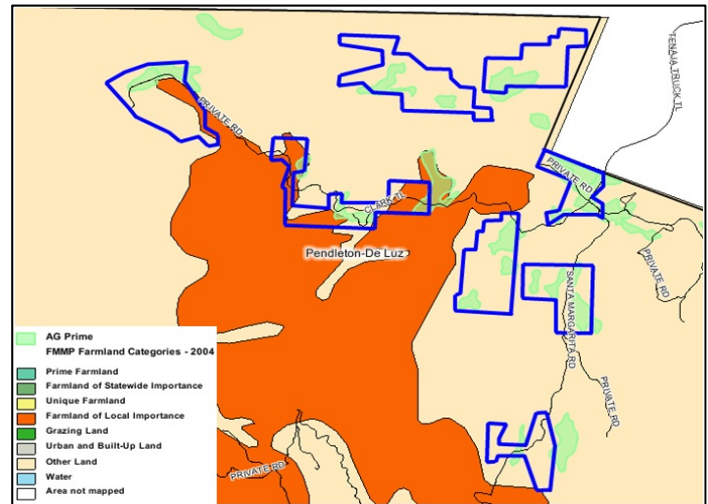


Staff Recommendation

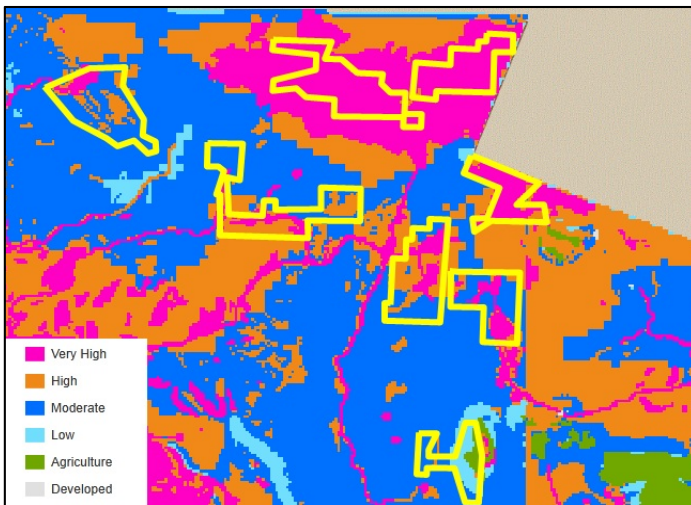
## Pendleton-DeLuz 1



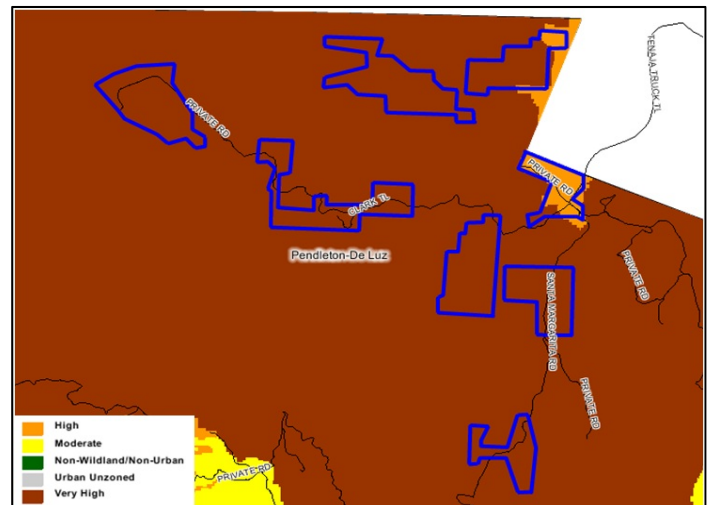
Steep Slope (Greater than 25%)



Agriculture



Habitat Evaluation Model



Fire Hazard Severity Zones

## Context

Pendleton-DeLuz-1 includes 18 privately-owned parcels within eight islands surrounded by the Cleveland National Forest that total approximately 1,000 acres, ranging in parcel sizes between one-half to 160 acres. The parcels, located near the intersection of Santa Margarita Road and Tanaja Truck Trail, are outside of the County Water Authority boundary in a federally-designated wilderness area of the National Forest. These properties are composed of approximately 1,000 acres of Very High and High Value habitat associated with oak woodlands. The area also includes about 190 acres of prime agricultural lands. Slopes greater than 25% cover most of the area. These properties are primarily located within the Very High Fire Hazard Severity Zone and are over 20 minutes away from the nearest fire station. The roads providing access are insufficient to serve additional development and would require road improvements through wilderness-designated National Forest lands. This area is groundwater dependent with a four-acre minimum lot size per the County Groundwater Ordinance.

## Staff Review: Rationale for RL-80 Designation

- Parcels are only accessible through the Wilderness-designated portion of the National Forest
- Many of the areas are only accessible by dead-end roads that exceed the minimum lengths allowed by the County Fire Code
- Parcels are nearly entirely constrained by either slopes greater than 25% or high value biological resources
- Generally surrounded by remote Wilderness designated portion of the Cleveland National Forest (see U.S. Forest Service letter dated March 18, 2013)
- RL-80 is consistent with how other similar areas are mapped

## Pendleton-DeLuz-1: Correspondence Received

*Comments from U.S. Forest Service opposed to CPG recommendation*

United States  
Department of  
Agriculture

Forest  
Service

Cleveland National Forest  
SO

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

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

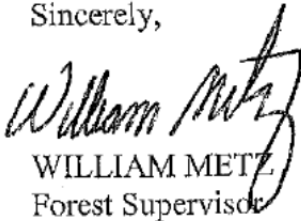
- **Pendleton – De Luz CPA.** The Forest recommends reducing the allowable density to RL-80 for RL-40 in areas surrounded by NFS lands in the Pendleton - De Luz CPA. These parcels are directly adjacent to the federally designated San Mateo Canyon Wilderness area. The parcels on Miller Mountain contain unique botanical resources and would require major road improvements across NFS lands if developed.

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