

Draft Responses to Comment Letter II

**United States Forest Service
William Metz
March 18, 2013**

	Comment	Response to Comment
II -1	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 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.	This comment is introductory in nature and does not raise a significant environmental issue for which a response is required.
II -2	Altogether, we are concerned about the potential environmental and public health and safety impacts that would be associated with increases in population density with 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.	From this comment, it is not clear what the baseline is for the statements asserting that there will be increases in population density. As described in the No Project Alternative in draft SEIR Chapter 4, these lands reverted back to pre-FCI General Plan designations on December 31, 2010. As such, current densities on these lands are generally higher than proposed densities; and they are higher than the densities that were in effect during the life of the Forest Conservation

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		Initiative. The project analyzed in the draft SEIR did not use either the current densities or the densities of the Initiative as a baseline. Rather, the SEIR analyzed the impacts of the Proposed Project (draft plan) in comparison to existing physical conditions (i.e., what is on the ground today).
II -3	Finally, we feel that the best way to protect both environmental 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.	<p>The County acknowledges the Forest’s preference for the Modified Project Alternative. At this time, a staff recommendation has been developed that takes into account physical and environmental constraints, applies general plan principles and takes into account the comments received during public review. The result is a staff recommendation more consistent with the Modified Project Alternative, with reduced densities in the more rural areas near national forest lands. One exception where there are increased densities is in Alpine along Willows Road and Alpine Boulevard where village densities are proposed.</p> <p>The County does not agree that buffer zones should be a provision under this proposed General Plan Amendment (GPA) because the low densities applied near forest lands would adequately protect forest lands. The GPA covers over 75,000 acres of private lands for which potential future uses can only be assumed in a general manner per the proposed land use designations. Actual future structure types and uses of the lands may vary widely. A “blanket” buffer zone around all of these lands would be arbitrary in size and its applicability uncertain. In addition, the County does not agree that there is a clear nexus for this request or proportionality to potential environmental impacts.</p>
II -4	<p><u>Comments Addressing all FCI Lands</u></p> <p>The rapidly increasing population of Southern California, the growing level of development adjacent to the Cleveland</p>	The County appreciates this comment and acknowledges the challenges facing the Forest Service. The concerns regarding wildland fires and flooding are not inconsistent with the

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	<p>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.</p>	<p>existing content of the draft SEIR.</p>
<p>II -5</p>	<p>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.</p>	<p>The County acknowledges these general concerns about increasing homes in a given area. It should be noted that the County is not proposing to increase the number of homes for an area. Rather, the County is proposing to bring the former FCI lands into the County’s General Plan. Currently, these lands have pre-FCI densities, which are generally considered to be too intense based on the County’s current General Plan principles. The County is proposing to apply appropriate lands use designations and densities based on existing land uses, environmental constraints, and surrounding conditions.</p>
<p>II -6</p>	<p>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</p>	<p>The County does not agree that buffer zones should be applied to former FCI lands as part of this Project (see response to comment II-3 above). This comment references subdivisions and associated infrastructure. Such development is subject to discretionary approvals, through which, appropriate buffers, setbacks, and avoidance measures are established to avoid forest resources.</p>

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	<p>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.</p>	
<p>II -7</p>	<p>To avoid these impacts, we request that water delivery systems be established before enabling increased density on former FCI lands.</p>	<p>Both the draft plan analyzed in the SEIR and the staff recommendation proposes decreased densities overall compared to former FCI lands. The expansion of imported water would not be required to support the densities of either the draft plan or the staff recommendation, with the exception of the proposed village expansion in Alpine. Where village densities are proposed along Willows Road and Alpine Boulevard, imported water would be required to support proposed densities. However, imported water infrastructure would not be established until there is proposed development that will be able to support the extension, in coordination with the local water district.</p> <p>In this area, existing uses already threaten to exceed acceptable groundwater usage levels. Proposing increased density in this area would make the extension of imported water feasible. While County staff recommends an increase of density and/or intensity in the Alpine area, the Board of Supervisors will ultimately determine what the appropriate land use designations for this project. The information in this comment will be in the Final SEIR for review and consideration by the County Board of Supervisors.</p>
<p>II -8</p>	<p>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</p>	<p>The County agrees with this comment, which is not inconsistent with the existing content of the DEIR.</p>

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	<p>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.</p>	
II -9	<p>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.</p>	<p>The County agrees with this comment. The draft plan analyzed in the SEIR proposes to reduce subdivision potential as compared to the existing land use designations that apply to these lands. In addition, the staff recommendation proposes further density decreases in areas adjacent to National Forest lands.</p>
II -10	<p>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 reluctant to accommodate access across their land.</p>	<p>The County acknowledges the challenges facing the Forest Service. As previously noted, both the draft plan and the staff recommendation generally reduce the future subdivision potential for private lands adjacent to National Forest lands, which would reduce future subdivision potential.</p>
II -11	<p>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</p>	<p>The County appreciates the concern over illegal motor vehicle use in designated Wilderness lands from residents living adjacent to the National Forest. As discussed in comment II-3, subdivision potential has been minimized on</p>

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	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.	private lands adjacent to National Forest lands both under the draft plan analyzed in the draft SEIR and under the staff recommendation. More specifically, there are three parcels within the project study area adjacent to the Hauser Wilderness that staff is recommending a designation of Rural Lands 40, which would prevent further subdivision of these lands.
II -12	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.	These introductory comments, regarding zoning on private lands adjacent to the National Forest to be complementary with the land use zone and ROS on the NFS land, are more fully developed subsequent comments and therefore more detailed responses are presented later for each topic.
II -13	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.	The County acknowledges these concerns. The draft plan analyzed in the draft SEIR proposes densities lower than the current (pre-FCI) land use designations. In addition, the staff recommendation designates private lands adjacent to designated Wilderness or Inventoried Roadless Areas at either the lowest General Plan density (Rural Lands 80) or at a density that does not allow for additional subdivision potential.
II -14	Extensive habitat conservation planning efforts led by local	See response to comment II-13 above. Consistent with the

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	<p>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.</p>	<p>guiding principles of the County General Plan, the Staff Recommendation land use map designated the private lands adjacent to Forest lands and remote from villages at low densities to minimize their subdivision potential.</p>
<p>II -15</p>	<p>Alpine Community Planning Area (CPA). The Forest is concerned about the density increases proposed for areas at the eastern end of Alpine, both south and north of Interstate 8. Road and water systems should be planned before enabling such increases, and the severe risk of fires starting along the freeway corridor and blowing westward into these areas should be addressed.</p>	<p>The County acknowledges the concerns expressed by this comment regarding density increases at the eastern end of Alpine, both to the north and south of Interstate 8. These areas are referred to as AL-3 and AL-6 in the staff report. The County does not agree that road and water systems should be planned before enabling such increases. The land use map changes that would increase the density in this area would drive the planning to extend the imported water system infrastructure. The planned expansion of the</p>

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		<p>infrastructure would not occur unless appropriate densities are assigned to the land use map.</p> <p>Fire hazards were addressed in Section 2.6 of the SEIR. The analysis found, consistent with the General Plan EIR, the project would result in potentially significant direct and cumulative impacts related to wildland fire. Various mitigation measures are applied that would reduce impacts associated with wildland fire; however, the impacts would not be reduced to below a level of significance and the SIER analysis found that the proposed project would result in significant and unavoidable direct and cumulative impacts related to wildland fires. Nonetheless, future development in this area would be required to address and mitigate for site specific wildfire impacts during future discretionary review processes.</p>
II -16	<p>Alpine CPA. In addition, Viejas Mountain was designated a Critical Biological Area of the National Forest by our Land Management Plan due to its unique botanical resources. The dense developments proposed for its perimeter and northeast of the Viejas Reservation, shown in yellow (SR-1) on the proposed maps, would be unlikely to effectively buffer this sensitive area from the impacts of residential development. This zoning also appears to be inconsistent with similar areas on the west side of Viejas Mountain, which are designated as RL-40.</p>	<p>This comment is referencing two islands to the north of Viejas and adjacent to the National Forest that are designated Semi-Rural 1 (one dwelling unit per acre) on the Draft Plan (SEIR Proposed Project) land use map (referred to as AL-1). Since this land use map was created, the County was informed that the two western parcels have been transferred into trust and are now part of the Viejas Reservation. Therefore, the County no longer has any land use authority over these parcels. The parcels located in the eastern area are proposed for a Semi-Rural 10 density (one dwelling unit per ten acres) on the Staff Recommendation land use map. This density will not allow for any further subdivision of these parcels.</p>
II -17	<p>Alpine CPA. For the parcels that were re-designated as RL-20 since the last maps were made available, we would prefer that the RL-40 designation be retained instead to prevent the</p>	<p>This comment is referencing the 22 parcels totaling approximately 1,639 acres located south of the Alpine Village and accessed by Japatul and Japatul Valley Roads,</p>

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	environmental and public health and safety impacts as described above.	referred to as AL-8 in the staff report. The Staff Recommendation land use map includes a Rural Lands 40 land use designation, rather than the Rural Lands 20 designation as proposed by the Community Planning Group and analyzed as the Draft SEIR Proposed Project. The Rural Lands 40 is being recommended to reduce future subdivision potential in this area due to the existing large parcel sizes, inadequate road access, and proximity to the National Forest lands.
II -18	Jamul CPA –Skye Valley Ranch. The Forest would recommend continuing the RL-80 zoning on these parcels. The bridge over Pine Creek near Barrett Honor Camp is insufficient for any traffic, even in an emergency, and will not be improved or replaced since it falls within the Pine Creek Wilderness. Additionally, these parcels border two existing federally designated wilderness areas (Pine Creek Wilderness and Hauser Wilderness) and are completely surrounded by NFS lands. Further improvement of infrastructure to this area, such as utilities and road access, required for a smaller lot size zoning would have a negative impact on wilderness values, increase the need for fuels treatments, and raise potential for the issues and impacts described above.	This comment is referring to the four parcels totaling approximately 730 acres in the northeastern portion of the Jamul/Dulzura Community Planning Area, referred to as JD-1 in the staff report. The Community Planning Group recommended a Rural Lands 40 designation in this area and the Draft SEIR analyzed the Community Planning Group recommended designation. However, based on a review of physical and environmental constraints, including those detailed in the comment, the Staff Recommendation for this area is Rural Lands 80, consistent with the commenter’s recommendation. Ultimately the Board of Supervisors will decide the appropriate land use designations to apply.
II -19	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.	This comment is referring to 36 parcels totaling 2,193 acres in the western portion of the Cuyamaca Subregional Planning Area and eastern portion of the unrepresented area of the Central Mountain Subregion, referred to as CU-1 in the staff report. The Community Sponsor Group recommended a Rural Lands 40 designation in this area and this was evaluated as part of the draft plan in the draft SEIR. However, based on a review of the physical and environmental constraints in the area, including those

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		mentioned in the comment, the Staff Recommendation for this area is Rural Lands 80. Ultimately the Board of Supervisors will decide the appropriate land use designations to apply.
II -20	Descanso CPA. The Forest supports the mix of zoning as mapped for the Descanso planning area and encourages the County to retain the lower density RL-80 zoning that is currently proposed. The northern part of the Descanso CPA abuts two IRAs (Sill Hill and No Name) that are proposed for recommended wilderness status in the Southern California National Forests Land Management Amendment Project. Also adjacent to the north Descanso CPA is the King Creek Research Natural Area, which contains a rare population of Cuyamaca cypress, a Forest Service sensitive species. All of the King Creek stands burned in a fire in 1950 and most of the area re-burned in the 2003 Cedar Fire. Post-Cedar Fire regeneration is expected to be adequate to repopulate the stands because trees were old enough to have substantial cone banks at the time of the fire; however, it is important to protect the stand from overly frequent fire especially at this vulnerable time. For these reasons, the Forest supports a minimum of RL-40 adjacent to these IRAs and research natural area on the NFS land.	The County acknowledges the Forest Service’s support for the mix of Rural Lands 40 and Rural Lands 80 land use densities on the Draft SEIR Proposed Project land use map for the Descanso Subregional Plan Area, which is consistent with the Community Planning Group’s recommendation. The Staff Recommendation land use map for Descanso is the same as the Draft Plan (SEIR Proposed Project).
II -21	Pine Valley CPA. The Forest supports the current extent of RL-80 zoning proposed for the Pine Valley CPA in the Draft Land Use Plan. This area contains many of the highest recreational and scenic values to be found on the Cleveland National Forest. Parcels in this CPA south of Interstate 8 are directly adjacent to the Mount Laguna National Recreation Area.	The County acknowledges the Forest Service’s support for the extent of Rural Lands 80 land use densities on the Draft SEIR Proposed Project land use map for the Pine Valley Subregional Plan Area, which is consistent with the Community Planning Group’s recommendation. The Staff Recommendation land use map for Pine Valley is the same as the Draft Plan (SEIR Proposed Project).
II -22	Pine Valley CPA. The Forest also supports maintaining the proposed RL-40 zoning adjacent to Buckman Springs Road	The County acknowledges the Forest Service’s support for the Rural Lands 40 land use densities on the Draft SEIR

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	because the NFS land to the east is zoned as Back County Non-Motorized, which is the most restrictive zoning other than recommended wilderness and designated wilderness. In addition, the Pacific Crest Trail, a 2,650-mile national scenic trail that runs from Mexico to Canada through California, Oregon and Washington, traverses this area before moving onto the National Forest. The low density proposed would help maintain the recreational and scenic values.	Proposed Project land use map along Buckman Springs Road in the southern portion of the Pine Valley Subregional Plan Area and northeast of Lake Morena in the Campo/Lake Morena Subregional Plan Area. The Staff Recommendation land use map for this area is the same as the Draft Plan (SEIR Proposed Project).
II -23	Central Mountain CPA. We recommend RL-80 zoning for parcels in the Central Mountain CPA where RL-40 zoning in the adjacent Julian CPA was extended into parcels within the Cleveland National Forest. This recommendation affects two contiguous parcels that are adjacent to the Upper San Diego River Canyon. The Upper San Diego River is an area of rugged topography and high fire danger. In addition, this undeveloped area is proposed for recommended wilderness status in the Southern California National Forests Land Management Plan Amendment project.	The comment appears to be referring to three parcels in the northeastern section of Central Mountain not represented by a planning or sponsor group, referred to as CM-1 in the staff report. The three parcels are in two different areas and are surrounded by the Forest on three sides. They are all designated with a Rural Lands 40 density on the Draft Plan (SEIR Proposed Project) land use map. Two of the parcels are 40 acres in size and could not be further subdivided with the RL-40 density. The third parcel is 120 acres and could potentially subdivide into three parcels with the RL-40 density proposed by the Draft Plan. Consistent with the recommendation of this commentor, the Staff Recommendation land use map applies a RL-80 density based on the fact that its only access is via a dead-end road more than one mile long and that the parcel is nearly entirely constrained by either slopes greater than 25% or sensitive biological resources. The RL-80 density will not allow additional subdivision of this parcel.
II -24	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	This comment is referring to 19 parcels totaling approximately 1,016 acres located within eight islands surrounded by the Cleveland National Forest in the Pendleton-DeLuz Community Planning Area, referred to as PD-1 in the staff report. This area is designated Rural Lands 40 on the Draft Plan (SEIR Proposed Project) land use map.

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	would require major road improvements across NFS lands if developed.	Based on a review of physical and environmental constraints, including those mentioned in the comment, the Staff Recommendation for this area is RL 80.
II -25	North Mountain CPA. The Forest supports the current extent of RL-80 zoning in the North Mountain CPA and encourages the county to retain this zoning through the planning process.	The County acknowledges the Forest Service's support for the extent of Rural Lands 80 land use densities on the Draft Plan (SEIR Proposed Project) land use map for the North Mountain Subregion. The Staff Recommendation maintains the same RL-80 density as the Draft Plan.
II -26	North Mountain CPA. We are uncertain of the proposed density for the triangular parcel on the north side of Warner Springs, which abuts the Caliente Inventoried Roadless Area proposed for wilderness designation in the Southern California National Forests Land Management Plan Amendment project. Reducing the density for this parcel to the RL-80 zoning would better buffer the proposed recommended wilderness area from adjacent land uses.	This comment is referring to a 21.7-acre parcel that is part of the Warner Springs Specific Plan and has been designated Specific Plan Area, consistent with the private lands to the west. This is an approved Specific Plan and this area of the Specific Plan is designated for open space, therefore, no further development of this parcel would be allowed.
II -27	The Draft SEIR should clearly make the case that the objectives presented in Chapter 1.3, as drawn from the County of San Diego General Plan, are met by the proposed project. In our view, the document fails to demonstrate that the proposed project meets the majority of the objectives and instead includes evidence that objectives will not be met.	The County agrees that draft SEIR does not include a detailed discussion of how the project meets the majority of the project objectives; however staff considered the project objectives in developing the draft plan and the proposed staff recommendation. Staff believes that the draft plan and the proposed staff recommendation meet most of the basic objectives of the project. However, a determination has not yet been made regarding which alternative best meets the objectives. The decision makers for the project (Planning Commission and Board of Supervisors) will determine which project alternative best meets the project objectives.

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II -28	<p>Other than stakeholder participation, the only objective that the proposed project could meet is the first one listed – “Support a reasonable share of projected regional population growth;” –and we feel that it fails to meet even this objective, because the failure to meet the remainder of the objectives renders the share of growth unreasonable.</p>	<p>The County disagrees that the project does not meet a majority of the project objectives, with the exception of “Support a reasonable share of projected regional population growth” and “Recognize community and stakeholder interests while striving for consensus.”</p> <p>The remaining project objectives include the following:</p> <ul style="list-style-type: none"> ▪ Promote sustainability by locating new development near existing infrastructure, services, and jobs; ▪ Reinforce the vitality, local economy, and individual character of existing communities while balancing 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; ▪ Maintain environmentally sustainable communities and reduce greenhouse gas (GHG) emissions that contribute to climate change; ▪ Preserve agriculture as an integral component of the region’s economy, character, and open space network; ▪ Minimize public costs of infrastructure and services and correlate their timing with new development; and, <p>As described in the No Project Alternative in draft SEIR Chapter 4, the FCI lands reverted to pre-FCI General Plan designations on December 31, 2010. As such, the draft plan analyzed in the draft SEIR and the staff recommendation would both meet the project objectives better than the</p>

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		<p>existing land use designations because both plans apply reduced densities in the more rural areas, promoting environmental stewardship and accounting for physical constraints of the land. The draft plan and staff recommendation land use maps promote sustainability by applying land use designations in accordance with the community development model and promote the local economy by focusing densities in existing or planned village.</p> <p>See also response to comment II-27.</p>
II -29	<p>The proposed project clearly conflicts with 6 of the 10 objectives, as the rationale beneath each objective below demonstrates:</p> <ul style="list-style-type: none"> -Promote sustainability by locating new development near existing infrastructure services, and jobs. -Remote parcels within and adjacent to the Cleveland National Forest are far from infrastructure, services, and jobs. 	<p>The County disagrees that the proposed project conflicts with 6 of the 10 objectives. As described in the No Project Alternative in draft SEIR Chapter 4, the FCI lands reverted to pre-FCI General Plan designations on December 31, 2010. As such, the draft plan analyzed in the draft SEIR and the staff recommendation would both meet the project objectives better than the existing land use designations because both plans apply the General Plan Community Development Model by locating new development near existing infrastructure, services and jobs. Lower densities are applied in the more rural areas where sensitive environmental resources and wildfire hazards exist, including areas within and adjacent to the Cleveland National Forest where infrastructure, services and jobs are not available. See also response to comment II-27.</p>
II -30	<ul style="list-style-type: none"> -Promote environmental stewardship that protects the range of natural resources and habitats that uniquely define the County’s character and ecological importance. -Increased development on remote parcels within and adjacent to the Cleveland National Forest threatens many of the natural resources and habitats that uniquely define the County’s character and ecological importance. 	<p>See response to comment II-29.</p>

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II -31	<p>-Ensure that development accounts for physical constraints and the natural hazards of the land.</p> <p>-Remote parcels within and adjacent to the Cleveland National Forest experience severe risk of wildland fire incursion.</p>	See response to comment II-29.
II -32	<p>-Provide and support a multi-modal transportation network that enhances connectivity and supports community development patterns.</p> <p>-Remote parcels within and adjacent to the Cleveland National Forest are accessible only by passenger vehicle and road access is substandard for general residential use.</p>	See response to comment II-29.
II -33	<p>-Maintain environmentally sustainable communities and reduce greenhouse gas emissions that contribute to climate change.</p> <p>-Remote parcels within and adjacent to the Cleveland National Forest would not be environmentally sustainable for numerous reasons cited throughout this letter, and the development and access would increase greenhouse gas emissions that contribute to climate change.</p>	The County maintains that both the draft plan analyzed in the SEIR and the proposed staff recommendation would meet the project objective of maintaining environmentally sustainable communities and reducing greenhouse gas emissions when compared to the existing land use designations. As described in the No Project Alternative in draft SEIR Chapter 4, the FCI lands reverted to pre-FCI General Plan designations on December 31, 2010. The draft plan analyzed in the draft SEIR and the staff recommendation both apply the General Plan Community Development Model that focuses development near existing infrastructure, services and jobs and applies lower densities in the more rural areas where sensitive environmental resources exist. See also response to comment II-29.
II -34	<p>-Minimize public costs of infrastructure and services and correlate their timing with new development.</p> <p>-Remote parcels within and adjacent to the Cleveland National Forest would maximize public costs of infrastructure and services.</p>	The County maintains that both the draft plan analyzed in the SEIR and the proposed staff recommendation would meet the project objective of minimizing public costs of infrastructure and services and correlating their timing with new development. Both the draft plan analyzed in the SEIR and the staff recommendation propose reduced densities in rural

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		<p>areas far from infrastructure and services. Proposed densities on remote parcels within and adjacent to the Cleveland National Forest are reduced which would minimize public costs of infrastructure and services.</p>
II -35	<p>The assumption is made throughout the analysis of potential impacts that “regulations, implementation programs, and mitigation measures from the General Plan Update EIR” will result in impacts that fall below the threshold of significance. This assumption is flawed in that it fails to recognize the irretrievable losses to natural and cultural resources involved when subdividing new areas of an already densely populated region.</p>	<p>As discussed in Section 1.7 SEIR Impact Analysis Methodology, the methodology for analysis of potential environmental impacts associated with the proposed Project is similar to that performed in the General Plan Update Program EIR. Specifically, the programmatic-level analysis contained in this SEIR does not, and cannot, speculate on the individual environmental impacts of specific future development projects on lands affected by the proposed Project. Similarly, the SEIR cannot apply project specific mitigation measures to a program level environmental document. The potential for significant impacts to occur on lands affected by the proposed Project as a result of implementation of proposed GPA is based upon specific technical analyses and GIS data. The County maintains that it is appropriate to rely on regulations, implementation programs and mitigation measures from the General Plan update EIR to mitigate for impacts resulting from implementation of the Forest Conservation Initiative Lands GPA.</p>
II -36	<p>The Draft SEIR presents numerous plans and projects considered in evaluating cumulative impacts, but it fails to include the impacts of the past development of San Diego County, as represented by the existing condition of the region. When viewed through this lens, further increases by population density in remote areas of the County will necessarily have significant impacts, regardless of “regulations, implementation programs, and mitigation</p>	<p>The County does not agree that the draft SEIR failed to include the impacts of the past development of San Diego County to represent the existing condition of the region. Cumulative impacts are considered to be a project’s impacts combined with the impacts of other related past, present and reasonably foreseeable future projects. The draft SEIR cumulative analysis considers the impacts of past development by virtue of the fact that it is a Plan to Ground</p>

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	measures.” The scope of the cumulative impacts section needs to be broadened to include development that has occurred up to the current time.	analysis that considered existing conditions at the time the NOP was issued. The analysis was based on technical analysis and best available GIS data.
II -37	While the Draft SEIR considers many topics, it fails to offer the level of detail that would be needed to evaluate the environmental impacts of its alternatives. We feel that as a result of the vague nature of the analysis presented, environmental and public health and safety impacts have not been sufficiently analyzed or disclosed. Examples of these deficiencies are provided below by topic.	Alternatives described in the draft SEIR include a No Project, No New East Willows Village and a Modified Project. As the project is analyzed at a programmatic level, a plan to ground analysis is provided. At a plan level analysis, impacts can be inferred based on development density and intensity. As discussed in the SEIR, the No New East Village and No Project alternatives would have greater impacts because they would have greater densities and/or intensity than the proposed project. The Modified Project alternative would have a lesser impact because it would have a lesser density and or intensity than the proposed project. As the level of analysis is adequate for a program level document, no changes to the environmental document are required.
II -38	With regard to description of the impacts of the FCI Lands project on biological resources, there is no description of the actual impacts, as no inventory, identification, or evaluation of such resources has been completed and the actual impacts are unknown. Instead, there is only a general discussion of potential project impacts on general plant and wildlife species. These are assumed to be significant and unavoidable for special status species, riparian habitat, and wildlife movement corridors (Table S-2). However, there is no identification of effects on individual species even though the project will adversely affect or is likely to adversely affect a number of federally-listed species including Arroyo Toad, California Gnatcatcher, and San Diego Thornmint as well as candidate species for listing such as Hermes Copper butterfly.	<p>The SEIR for the FCI Lands Initiative GPA is a programmatic document. As such, the SEIR evaluates potential impacts using a plan to ground analysis. A ground to ground analysis (quantitative and/or qualitative) that identifies specific impacts (e.g. specific plant communities and wildlife species) would be evaluated when property owners within the identified project area apply for discretionary projects. Identification of specific project impacts is not appropriate for a program level analysis.</p> <p>Nonetheless, additional detail in the form of a table has been added to Figure 2-4-1 Estimated Vegetation Impact, to estimate the percentage of impact that would be expected for each general plan designation applied throughout the FCI project area.</p>

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II -39	The proposed alternatives will also adversely affect many of our Regional Forester's list of Sensitive Species through direct mortality and habitat loss and fragmentation, creating difficulties for conserving their populations on NFS lands. The blanket approach taken by the Draft SEIR does not adequately describe and disclose effects on these species, effectively leaving this analysis to later piecemeal analyses that will be done for individual projects. This does not allow for meaningful protection and conservation of these species across broader areas. This is not consistent with the purpose and intent of CEQA.	See response to comment II-37 and II-38.
II -40	Given the lack of detail in the SEIR, it is not possible to perform a meaningful comparison of the effects of the different alternatives. The analysis does not provide enough information to determine which alternative would best conserve key resources.	See response to comment II-37.
II -41	Section 15123(b)(3) of the CEQA Guidelines requires that an EIR address the issues to be resolved, which includes the choices among alternatives and whether or how to mitigate significant impacts. As stated in the Draft FCI Lands SEIR, the major issues to be resolved regarding the project include decisions by the Lead Agency as to whether or not the Draft SEIR adequately describes the environmental impacts, whether the recommended mitigation measures identified for the proposed Project should be adopted or modified, or if additional mitigation measures should be required.	This information is not inconsistent with information contained in the draft SEIR.
II -42	In regard to adequate description of the impacts of the FCI Lands project on historic or archaeological resources, there is no description of the actual impacts, as no inventory, identification, or evaluation of such resources has been	Your comment is acknowledged expressing concern that there is no description of the actual impacts, as no inventory, identification, or evaluation of such resources has been completed and the actual impacts are unknown. The SEIR

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	<p>completed and the actual impacts are unknown. Instead, there is only a general discussion of potential project impacts, which are assumed in advance to be less than significant through the implementation of various policies and mitigation measures contained in the General Plan Update.</p>	<p>for the FCI Lands Initiative GPA is a programmatic document. As such, the SEIR evaluates cultural resources on a plan to ground analysis. A ground to ground analysis (quantitative and/or qualitative) would be evaluated when property owners within the identified project area apply for discretionary projects.</p>
<p>II -43</p>	<p>Table S-2, “Summary of Project Impacts” and various sections of the Draft FCI lands SEIR contain information indicating that implementation of the Proposed Project would result in new development that would have the potential to result in substantial adverse changes to the significance of historical resources and cause a substantial adverse change in the significance of archaeological resources, including the destruction or disturbance of archaeological sites that contain or have the potential to contain information important to history or prehistory. However, with the application of various policies and mitigation measures, impacts to historic and archaeological resources are assumed to be “less than significant.” It is unclear from the analysis that cultural resources will actually be protected by such policies and measures to the extent that they would not be significantly affected by the Proposed Project.</p>	<p>Your comment is acknowledged that expressing concern that although impacts to historic and archaeological resources are assumed to be “less than significant”, it is unclear from the analysis that cultural resources will actually be protected to the extent that they would not be significantly affected by the Proposed Project. The mitigation measures that would apply to future development are requirements that the County can ensure are enforced and applied. Furthermore, the SEIR for the FCI Lands Initiative GPA is a programmatic document. As such, the SEIR evaluates cultural resources on a plan to ground analysis. A ground to ground analysis (quantitative and/or qualitative) would be evaluated when property owners within the identified project area apply for discretionary projects.</p>
<p>II -44</p>	<p>In Section 2.5 “Cultural Resources” of Table S-3 and various other sections of the Draft SEIR contain information indicating that the “Modified Project” alternative is likely to result in less impacts to historical and archaeological resources when compared to Proposed Project, and that implementation of the “No Project” alternative is likely to result in greater impacts when compared to the Proposed Project. However, under the mitigation process proposed in the Draft SEIR, impacts to historic and archaeological</p>	<p>The SEIR for the FCI Lands Initiative GPA is a programmatic document. As such, the SEIR evaluates cultural resources on a plan to ground analysis. A ground to ground analysis (quantitative and/or qualitative) would be evaluated when property owners within the identified project area apply for discretionary projects. The mitigation provided under the proposed project and alternatives assumes the presence of cultural resources. As such, these measures would be implemented when property owners apply for</p>

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	<p>resources would be “less than significant” with the implementation of mitigation measure for the Proposed, Modified, and No Action alternatives. This assumption is based on the assumption in advance that historic and archaeological resources are distributed evenly throughout the FCI lands. Depending on the actual distribution of these resources within the FCI lands, the differences in potential impacts between the implementation of the Proposed, Modified and No Action alternatives could be substantially different than those assumed in the Draft SEIR. The only real difference between the implementation of any one of these three scenarios would be the potential for significant impacts, not actual impacts, assuming the implementation of policies and mitigation measures always result in “less than significant” impacts. As a result, the comparison of these three scenarios is of no actual quantitative or qualitative value for the purposes of identifying an “Environmentally Superior” course of action.</p>	<p>discretionary projects and it is determined that cultural resources are present or suspected of being present on site. Based on the proposed project and alternative development densities and intensity, it can be determined which is the Environmentally Superior project. Therefore, no changes to the environmental document are required.</p>
<p>II -45</p>	<p>Page 12 of the “County Cultural Guidelines” states that “Determining what is an important cultural resource worth preserving [sic] is subjective and interpretive process; therefore, it is useful to utilize a standard assessment approach to evaluate cultural resources. In order to evaluate cultural resources, a comprehensive assessment must be conducted, including measuring the resource against the State CEQA Guidelines provisions and criteria established by the National Register of Historic Places, the California Register of Historical Resources, and the San Diego County Local Register of Historical Resources, and the Resource Protection Ordinance as well as assessing the integrity of the resource.” Without any actual assessment or evaluation of historic and archaeological resources within the FCI Lands project area, there is no quantitative or qualitative basis for</p>	<p>The SEIR for the FCI Lands Initiative GPA is a programmatic document. As such, the SEIR evaluates cultural resources on a plan to ground analysis. A ground to ground analysis (quantitative and/or qualitative) would be evaluated when property owners within the identified project area apply for discretionary projects.</p> <p>Alternatives described in the document include a No Project, No New East Willows Village and a Modified Project. As discussed above, the document is at a programmatic level and as such, a plan to ground analysis is provided. At a plan level analysis, impacts can be inferred based on development density and intensity. As discussed in the SEIR, the No New East Village and No Project alternatives would have greater impacts because they would have greater densities and/or</p>

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	<p>comparing the various courses of action, selecting an “Environmentally Superior” alternative, determining whether the recommended mitigation measures identified for the proposed Project should be adopted or modified, or determining if additional mitigation measures should be required for this project, as the Draft FCI Lands SEIR does not adequately describe the impacts of the Proposed Project on historic and archeological resources.</p>	<p>intensity than the proposed project. The Modified Project alternative would have a lesser impact because it would have a lesser density and or intensity than the proposed project. As such, no changes to the environmental document are required.</p>
<p>II -46</p>	<p>The section that deals with Wildland Fire (2.6.3.7) concludes that the Proposed Project would have significant impacts related to wildland fire, while suggesting that regulations, implementation programs, and mitigation measures would reduce those impacts. In the Mitigation Measures section (2.6.4.7), several mitigation measures are deemed infeasible that would dramatically reduce losses of homes and lives through restricting development in areas with more than a moderate fire hazard or requiring extensive fuel modification around development. Instead, the analysis determines that “one of the primary objectives of the project which is to accommodate a reasonable amount of growth” renders these mitigation measures infeasible. Apart from the fact that this conclusion disregards the remainder of project objectives, it also suggests that it is more valuable to allow growth in high and very high fire hazard areas than to protect those homes and people from the very hazards that the mitigation measures were designed to prevent. The end result of increasing population density on the former FCI lands will be greater losses of lives and property to recurrent wildland fire.</p>	<p>The County does not agree that that the conclusion as to infeasibility of several fire related mitigation measures disregards the remainder of the project objectives and suggests it is more valuable to allow growth in high and very high fire hazard areas than to protect homes and people. The comment makes inferences that are not stated in the EIR and are not supported by fact.</p> <p>In addition, the County does not agree that the end result will be increasing population density on the former FCI lands, resulting in greater losses of lives and property. As noted in responses to comments above, the draft plan analyzed in the draft SEIR and the staff recommendation both result in reduced densities in rural areas near the National Forest and in high fire hazard areas. See also response to comment II-29.</p>
<p>II -47</p>	<p>On a related note, the section that deals with Emergency Response and Evacuation Plans (2.6.3.6 and 2.6.4.6) conclude that significant impacts will be avoided through</p>	<p>The CEQA Guideline pertaining to this comment is as follows: Would the project impair implementation of, or</p>

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	<p>regulations, implementation programs, and mitigation measures. Three of the four measures presented, however, do not reflect the reality of the roads that would provide access to many of the FCI lands. These roads generally lack an interconnected road network, multiple ingress and egress routes, and suitability for use as rural roads serving residential subdivisions. The hazards of unsuitable escape routes resulting from these conditions along with the above-mentioned permission to develop in areas with high to very high fire hazards makes the likelihood even greater that implementation of the proposed project would lead to traffic losses of life and property.</p>	<p>physically interfere with, an adopted emergency response plan or emergency evacuation plan.</p> <p>The potential impacts associated with this guideline are analyzed in the Draft SEIR and mitigated to the extent feasible. The comment does not identify any adopted emergency response plans or emergency evacuation plans that would be affected by the proposed Project.</p>
<p>II -48</p>	<p>Given that the FCI lands are by definition in close proximity to the Cleveland Nation Forest, it is surprising to find no mention of our Land Management Plan in Section 2.8.3.2, which considers “Conflicts with Land Use Plans, Policies, and Regulations.” As described in the beginning of this letter, increasing population density on FCI Lands would lead to numerous environmental and public health and safety issues on the Cleveland National Forest, as described I our 2005 Land Management Plan, and would accelerate problems that our Plan directs us to remedy. As a result, we call into question the determination that project impacts with regard to land use plans, policies, or regulations would be below a level of significance. The conflict of this project with our Land Management Plan should be investigated and disclosed as part of this analysis.</p>	<p>County staff reviewed the Land Management Plan for potential conflicts throughout the General Plan Update process and the FCI Lands GPA process. County staff also coordinated with US Forest Service staff to ensure that the Land Management Plan was fully understood and to get feedback on the County’s draft plans. No conflict with the Land Management Plan has been identified to date.</p> <p>As noted in comments above, the FCI Lands GPA would not increase densities. Overall, the Project will greatly reduce densities with the exception of areas in Alpine where higher densities are planned near existing development. See also response to comment II-2.</p>
<p>II -49</p>	<p>Nowhere is the disconnect between this project and our Land Management Plan greater than where the FCI lands are adjacent to or within designated or recommended wilderness areas. There is no mention of designated or recommended wilderness on the Cleveland National Forest or other federal</p>	<p>The County does not agree that the FCI Lands GPA is in conflict with designated or recommended wilderness areas. In such areas, the County is proposing to reduce the existing densities. Therefore, the FCI Lands GPA is compatible with wilderness areas.</p>

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	lands managed by the Department of Interior. As such, there is no basis provided for evaluating the potential for the project to impact wilderness areas adjacent to FCI Lands. Potential project impacts on the wilderness resource could be significant and unavoidable, although it is not possible to perform a meaningful comparison of the effects of the different alternatives due to the lack of mention of wilderness in the Draft SEIR.	
II -50	<p>Section 2(c) of the Wilderness Act of 1964 (Public Law 88-577) defines wilderness: “A wilderness, in contrast with those areas where man and his own works dominate the landscape, is hereby recognized as an area where the earth and its community of life are untrammelled by man, where man himself is a visitor who does not remain. An area of wilderness is further defined to mean in this Act an area of undeveloped Federal land retaining its primeval character and influence, without permanent improvements or human habitation, which is protected and managed so as to preserve its natural conditions and which (1) generally appears to have been affected primarily by the forces of nature, with the imprint of man’s work substantially unnoticeable; (2) has outstanding opportunities for solitude or primitive and unconfined type of recreation...”</p> <p>In summary, the key elements of wilderness include its natural state (biological and other natural processes operating unimpaired, uninhibited, and unchanged by humans), opportunities for solitude and primitive recreation opportunities, undeveloped character, and untrammelled (unmanaged) nature.</p>	The County agrees with this comment.
II -51	Increased density and development near or adjacent to designated or recommended wilderness areas would likely adversely affect the wilderness resource in a number of	The County agrees with this comment. As noted above, the County is not proposing to increase density in wilderness areas. See also responses to comments II-2, II-48, and II-49.

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	<p>ways. Increased population in the County, particularly in rural areas, may result in increased use of wilderness, therefore impacting opportunities for solitude and primitive recreation opportunities. The visual impact of subdivisions on the wilderness user is also due consideration.</p> <p>Development in the vicinity of wilderness increases the likelihood that non-native, invasive species would be introduced into wilderness, thereby disrupting natural processes within the wilderness. Development upstream within watersheds shared by wilderness increases the likelihood of impaired water quality or decreased stream flows in wilderness due to runoff, impoundments, and/or groundwater use. Similarly, development adjacent to wilderness increases the likelihood that landowners build trespass structures, roads, or trails in wilderness, or use motorized or mechanized equipment in wilderness, thereby impacting its undeveloped character. Finally, increased development and density near wilderness increases the likelihood that fire management activities would impact the wilderness resource during wildfire events, which impacts the natural and untrammled characteristics of wilderness.</p>	
II -52	<p>While the SEIR presents a very broad analysis of the effects of the project on recreation facilities, it does not contain any discussion or analysis of recreation activities in undeveloped, backcountry areas assessed by trail or cross-country travel. Increased recreation in undeveloped, backcountry areas can have substantial adverse effects on the environment, including litter, graffiti, impaired water quality, erosion, increased risk of wildfire, and various impacts to vegetation, wildlife, and cultural resources.</p>	<p>While the County is not proposing to increase recreation under the FCI Lands GPA, analysis of potentially significant effects from future development and appropriate mitigation is provided in the Program EIR and the Draft SEIR. Future development projects will also be required to analyze potential impacts at the project level and provide all feasible mitigation for significant effects.</p>
II -53	<p>Increased population in the County would likely lead to an increase in recreation in both developed facilities and</p>	<p>It is not clear what the comment means with regard to developed facilities versus undeveloped recreation areas.</p>

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	undeveloped, backcountry areas. While this increased use could have beneficial recreational impacts, the SEIR should include any analysis of environmental impacts that result from recreation in undeveloped backcountry areas, as it does for developed facilities.	The CEQA Guidelines for this topic refer to the deterioration or expansion of recreational facilities. The County accepts that this can apply to undeveloped backcountry areas as well as developed areas. The impacts evaluated in the Program EIR and the Draft SEIR would cover both types of areas. See also response to comment II-52 above.
II -54	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 the greatest. As a result, we strongly support the adoption of the Modified Project Alternative rather than the Proposed Project.	The County acknowledges the commenter's preference for the Modified Project Alternative.
II -55	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.	The County does not agree with this comment. See also response to comment II-3.
II -56	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 the San Diego County. If you have any questions about these comments, please contact	This is a concluding comment that does not require a response.

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	Jeff Heys, Forest Planner, at (858) 674-2959.	

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