

GR-1 Project Objectives

The FCI Lands GPA Draft SEIR listed Project objectives in Section 1.3, Project Objectives. There are 12 objectives, the first ten of which are from the 2011 General Plan PEIR and two were developed specifically for this project.

CEQA Guideline 15124 (b) provides direction to Lead agencies in crafting projects objectives. It reads:

(b) A statement of the objectives sought by the proposed project. A clearly written statement of objectives will help the lead agency develop a reasonable range of alternatives to evaluate in the EIR and will aid the decision makers in preparing findings or a statement of overriding considerations, if necessary. The statement of objectives should include the underlying purpose of the project.

In accordance with the Guideline, the project objectives included the underlying purpose of the project, which, as stated in SEIR Section 1.3, are to:

- Assign land use designations in a manner consistent with the Guiding Principles, Goals, and Policies of the adopted County General Plan.
- Assign land use designations that minimize conflicts with the U.S. Forest Service (USFS) Cleveland National Forest Management Plan.

Certain comment letters received during public review of the Draft SEIR contend that the proposed Project conflicts with the objectives set forth within the SEIR. Where this contention is set forth, the County has responded as to why specifically the Project would meet each Project objective. Overall, the proposed Project meets each project objective and specifically meets the two project objectives detailed above, which include the underlying purpose of the project. The proposed Project would assign land use designations consistent with the County General Plan within FCI lands and also would minimize conflicts with the USFS Cleveland National Forest Management Plan.

Some comment letters state that the project does not meet an objective, which in turn would cause impacts. Consistent with Guideline 15124 (b) above, the objectives were used to develop the Project alternatives, not for making determinations on the significance of impacts. The Project objectives were also used to inform the determination of the various land use designations that are represented by the proposed Project and project alternatives. Consistency or inconsistency with project objectives determines, in part, what constitutes a feasible or infeasible Project alternative. The project objectives will also aid the drafting of the necessary and appropriate findings required by CEQA Guideline 15091, Findings.

The determination of impact significance is performed with the use of significance criteria that is discussed at the beginning of each resource area of the Draft SEIR under the sub-heading of *Guidelines for the Determination of Significance*. None of the resource subjects analyzed in the Draft SEIR employ the project objectives as a means for determining the potential significance of impacts. How well or not

the proposed Project or any of the feasible alternatives meet all or individual project objectives is a determination that will ultimately be made by the County Board of Supervisors.

All comments regarding the proposed Project or feasible alternatives regarding their consistency with the project objectives will be included in the Final SEIR and made available to the decision makers for their consideration. It is the Board of Supervisors discretion to determine project consistency with project objectives, significance of impacts and whether or how to determine the final land use designations for the FCI Lands GPA Project.

GR-2 Project Baseline

Some comments received contend that the Draft SEIR did not utilize a proper existing conditions baseline. The “baseline” is generally what represents “on-the-ground” conditions, or environmental setting, for each issue analyzed in the EIR. By establishing the baseline condition, impacts of the proposed Project then can be analyzed as to how it would physically impact the existing environment, or baseline condition.

As described in Section 1.1 of Chapter 1 of the Draft SEIR, the FCI expired on December 31, 2010. With its expiration, the former FCI lands reverted to the land use designations of the previous General Plan (1978) in effect before the FCI was enacted. Further explained within the description of the No Project alternative in Chapter 4 of the SEIR, the current land use designations on the FCI lands allow for higher densities than the proposed Project or any of the other alternatives, and higher than the densities that were in effect during the life of the FCI. The land use designations currently associated with the FCI lands are not consistent with the 2011 General Plan land use designations or the General Plan Goals and Policies and Guiding Principles.

The analysis in the Draft SEIR did not use either the current land use designations or the designations of the FCI as the baseline. Rather, the Draft SEIR analyzed the impacts of the proposed Project in comparison to existing physical conditions (i.e., what is on the ground today). The County is of the opinion that the correct baseline was used and that impacts were analyzed accordingly. As an example, Table 2.4-1 in SEIR Section 2.04 identifies the acres of vegetation that would be impacted based on existing physical conditions on the ground today. Consistent with CEQA Guideline 15125 and discussed in section 1.5.1 Environmental Setting of the SEIR “The baseline conditions for the proposed Project are the same as those discussed in the General Plan Update PEIR and are incorporated here by reference. Refer to page 1-59 of Chapter 1 of the General Plan Update PEIR, Table 1-13 Environmental Baselines used in the General Plan Update PEIR.”

As explained in SEIR Section 4.5.1, the proposed Project is assigning land use designations that will decrease densities overall when compared to the existing land use designations, i.e. the No Project alternative.

County staff evaluated all Notice of Preparation (NOP) comments and attended community group meetings to gather input on the Project. In addition, hearings were held with both the Planning

Commission and Board of Supervisors. Through this process, the map endorsed by the Board of Supervisors in June 2014 became the proposed Project and a reasonable range of reduced development intensity alternatives was prepared for comparison in Chapter 4 of the Draft SEIR.

GR-3 Global Climate Change

The County developed a *Recommended Approach to Addressing Climate Change in CEQA Documents (Recommended Approach)* to be used during the County's review process for discretionary projects and environmental documents pursuant to CEQA (County of San Diego 2015). The guidance recommends using a 900 metric tons carbon dioxide equivalent per year (MT CO₂e/year) screening level to determine the need for additional analysis of greenhouse gas (GHG) emissions from a project. Projects that exceed the screening level are required to demonstrate a 16 percent reduction from the "unmitigated" scenario for 2020. The 16 percent reduction requirement is equivalent to California's AB 32 goal of reducing 2020 emissions to 1990 levels. This is because emissions from the 2020 "business as usual" scenario (i.e., where no action to reduce GHG emissions is taken) would need to be reduced by 15.75 percent to reach 1990 levels, according to analysis provided by the California Air Resources Board (CARB) (CARB2011).¹

Since distribution and use of the County's *Recommended Approach*, the California Supreme Court rendered its decision in the *Center for Biological Diversity v. California Department of Fish and Wildlife and Newhall Land and Farming* (2015) 62 Cal.4th 204 (*CBD vs. CDFW*, also known as the "Newhall Ranch" case). The justices evaluated for compliance with CEQA one of the most common approaches to GHG analyses for development projects (i.e., evaluating a project's emissions in the context of the AB 32's 2020 reduction goal), using a comparison to an unregulated, "business as usual (BAU)" emissions scenario.

The impact analysis in the Newhall Ranch EIR formulated a BAU scenario and the EIR determined the project's GHG impact to be less than significant. The Court upheld the use of BAU analysis generally, but overturned the Newhall Ranch EIR's use of this BAU approach, because it lacked a "reasoned explanation based on substantial evidence" about the linkage between the individual project's emissions and the statewide Scoping Plan reduction goals on which the BAU approach was based. The Court also suggested a need "in the near future" to consider post-2020 GHG reduction targets for projects with longer buildouts.

In response to the Newhall Ranch case, the County revised its *Recommended Approach* in July 2016 (County of San Diego 2016). The revised guidance recommends the use of GHG efficiency metrics to assess the GHG efficiency of a project on a "service population (SP)" basis (the sum of the number of jobs and the number of residents provided by a project). These metrics represent the rate of emissions needed to achieve a fair share of the State's emissions mandate embodied in AB 32. The use of "fair share" in this instance indicates the GHG efficiency level that, if applied statewide, would meet the AB

¹ It should be noted that CARB made slight revisions to the 1990 and 2020 GHG inventories in the latest update to the Scoping Plan (May 2014). The revisions were based on updated global warming potentials. However, the resulting inventories differed by less than one percent from what was reported in the Functional Equivalent Document referenced here.

32 emissions target and support efforts to reduce emissions beyond 2020. County staff has developed GHG efficiency metrics for the project based on emissions rates for the land use-driven emission sectors in CARB's GHG inventory.

Although CEQA Guidelines 15064.7 encourages agencies to adopt generally applicable thresholds of significance, it does not limit an agency's discretion to analyze CEQA impacts in other ways, or use methodology specifically tailored for the project under review. *Save Cuyama Valley v. County of Santa Barbara*, 213 Cal.App.4th 1059, 1068 (2013) (CEQA Guidelines Section 15064.7 does not require the County to adopt thresholds of significance: "CEQA grants agencies discretion to develop their own thresholds of significance."). Per *Save Cuyama Valley v. County of Santa Barbara* (2013) 213 Cal. App. 4th 1059, an agency needs to follow the requirements for threshold adoption set forth in CEQA 15064.7 only when it is formally adopting thresholds to be used as a matter of general application. The County's revised guidance document states that it provides "one potential set of criteria and methodologies", and that "alternative approaches to evaluating GHG emissions may be utilized." "Other methods to determine the significance of impacts . . . will be considered on a case-by-case basis." See also *Oakland Heritage Alliance v City of Oakland* 195 Cal.App.4th 884 (2011). This approach is consistent with existing case law. See, e.g., *Save Cuyama Valley v. County of Santa Barbara*, 213 Cal.App.4th 1059, 1064 (threshold tailored for particular project); *Mount Shasta Bioregional Ecology Center v. County of Siskiyou*, 210 Cal.App.4th 184, 208-09 (2012) (determination of threshold established for project "was a judgment call more properly left to the County" than to the court). Therefore, the County's revised GHG guidance document was developed consistent with CEQA.

In addition, the GHG analysis is consistent with CEQA Guidelines Section 15064.4. The CEQA Guidelines offer two paths to evaluating GHG emissions impacts in CEQA documents: 1) Projects can tier off a qualified GHG Reduction Plan (CEQA Guidelines Section 15183.5); or 2) Projects can determine significance by calculating GHG emissions and assessing their significance (CEQA Guidelines Section 15064.4).

Neither CARB nor the San Diego Air Pollution Control District (SDAPCD) has adopted significance criteria applicable to land use development projects for the evaluation of GHG emissions under CEQA. OPR's Technical Advisory titled "CEQA and Climate Change: Addressing Climate Change through CEQA Review" states, "public agencies are encouraged, but not required to adopt thresholds of significance for environmental impacts. Even in the absence of clearly defined thresholds for GHG emissions, the law requires that such emissions from CEQA projects must be disclosed and mitigated to the extent feasible whenever the lead agency determines that the project contributes to a significant, cumulative climate change impact." Furthermore, OPR's advisory document indicates, "in the absence of regulatory standards for GHG emissions or other scientific data to clearly define what constitutes a 'significant impact,' individual lead agencies may undertake a project-by-project analysis, consistent with available guidance and current CEQA practice."

In addition, the California Association of Environmental Professional's (AEP's) Climate Change Committee White Paper *Beyond Newhall and 2020: A Field Guide to New CEQA Greenhouse Gas Thresholds and Climate Action Plan Targets for California* (October, 2016) confirms that lead agencies have the authority to determine which CEQA methodology is best suited for their projects. In addition, it recommends that GHG emissions impacts should be identified for the project horizon year and lead agencies should consider the project horizon year when analyzing a project's GHG impacts; the AEP Climate Change Committee recommends that the analysis go out only as far as the project's full-build horizon. For the FCI Lands GPA, the projected buildout is 2050. Based on the aforementioned, the County determined that the Efficiency Metric is the best approach to analyzing GHG emissions for the proposed project.

The County reached this conclusion after analyzing different possible GHG methodologies. These alternate approaches included: comparing a project to Business-as-usual (BAU) emissions; evaluating a project for compliance with regulatory programs designed to reduce GHG emissions; determining whether a project is consistent with a locally applicable Climate Action Plan (CAP); and determining whether a project is consistent with a locally applicable Sustainable Communities Strategy (SCS). Based on this analysis, which included an examination of the limitations of each of these alternate approaches, the County determined the Efficiency Metric is the most responsive to the predominate types of projects seeking County discretionary approval (residential and mixed use projects) and equitably functions with the available emissions data.

Furthermore, the Efficiency Metric approach is one of the methods for analyzing GHG emissions discussed in the Newhall Ranch case. Specifically, the Supreme Court noted that numeric approaches may be appropriate for determining significance of GHG emissions, and emphasized the consideration of GHG efficiency. 62 Cal.4th at 220, 230. Therefore, the validity of using the Efficiency Metric approach is supported by the Supreme Court ruling.

Efficiency Metric analysis has also been recommended for land use sector projects by agencies such as the Bay Area Air Quality Management District (AQMD), the San Luis Obispo County Air Pollution Control District (APCD), and the South Coast AQMD. These agencies widely use this methodology, but consistent with the County, have not officially adopted it.

AEP's White Paper also specifically suggested the Efficiency Metric as one possible methodology for analyzing a project's GHG impacts post-Newhall Ranch: "Efficiency thresholds have been developed for land use sector projects based on AB 32 targets and are in common use by certain lead agencies." (Table 1: CEQA Project Significance Threshold Concepts in Light of the Newhall Ranch Ruling and Post-2020 Concerns, Page 8).

The County also sought advice from consultants on the County of San Diego CEQA Consultants List for Air Quality, many of whom are also members of the AEP's Climate Change Committee, and are experts in the field of analyzing GHG emissions. Consistent with the advice of these consultants, the County of San Diego used the Efficiency Metric to confirm the original impact determination of the FCI Lands GPA SEIR analysis.

The Efficiency Metric may be applied evenly to all project types (residential, commercial/retail and mixed use) and uses an emissions inventory comprised only of emission sources from land-use related sectors. The efficiency approach allows lead agencies to assess whether any given project or plan would accommodate population and employment growth in a way that is consistent with the emissions limit established under AB 32. The land-use sector driven inventory for 1990 was divided by the population and employment projections for California in 2020. The resultant GHG efficiency metric for the targeted emissions level for 2020 is 4.9 MT CO₂e/SP/year.

2020 Efficiency Metric

The GHG efficiency metric is 4.9 MT CO₂e/SP/year for 2020.

<u>California Service Population in 2020</u>	
2020 Population Projection* =	40,619,346
2020 Employment Projection** =	<u>18,511,200</u>
2020 Service Population =	59,130,546 SP
<u>CARB's 1990 California GHG Inventory = 2020 Emissions Target</u>	
1990 Total Emissions =	431.0 MMT CO ₂ e
1990 Non-land Use Emissions*** =	<u>144.3 MMT CO₂e</u>
1990 Land Use Emissions =	286.7 MMT CO ₂ e

1990 Land Use Emissions/2020 SP, or 286.7 MMT/59,130,546 SP = 4.9 MT/SP
where MMT = million metric tons

Sources/notes:

*California Department of Finance, Demographic Research Unit
Report P-2, State and County Population Projections by Race/Ethnicity and Age (5-year groups)
2010 through 2060 (as of July 1); December 15, 2014

**California Department of Finance, Employment Development Department
Industry Employment Projections, Labor Market Information Division, 2010-2020; May 23, 2012

*** Non-land Use Emissions removed from equation to coincide with San Diego County emission sectors include: heavy industry; forestry; and traditional agriculture (crops).

Operation of projects resulting from the FCI Lands GPA would continue well after 2020; Project buildout is assumed to occur by 2050. For this reason, this analysis includes an evaluation of potential GHG impacts in the timeframe beyond 2020. Also, Governor Brown recently signed SB 32, which establishes a state emissions reduction target of 40 percent below 1990 levels by 2030. In anticipation of this legislation, the SEIR analyzed the potential project impacts on achieving the emission reduction targets embodied in the legislation, which essentially implements Executive Order B-30-15. CARB has indicated that an average statewide GHG reduction of 5.2-percent per year would be necessary to achieve the 2030 and 2050 targets embodied in Executive Orders B-30-15 and S-3-05, respectively (CARB 2015). Therefore, a GHG efficiency goal in terms of metric tons per service population, similar to the one developed for 2020, was estimated for 2030 and 2050 to allow evaluation of the project's GHG emissions in the post-2020 landscape. The equivalent goals for 2030 and 2050 compute to 2.7 and 0.8 MT CO₂e/SP/year, respectively. These targets were estimated by applying a uniform reduction from CARB's 1990 emissions inventory and dividing the resultant value by the projected statewide population and employment in 2030 and 2050. While a statewide GHG reduction plan for post-2020 targets to achieve either of the Executive Orders (S-03-05, B-30-15) has not been adopted; the County bases its

significance determination for this proposed project on the interim 2030 target and projected buildout at 2050 to align with State goals.

If the project's estimated GHG emissions per service population in 2020 are less than the efficiency metric, the impact would be considered less than significant for the AB 32 target year. If the project's estimated GHG emissions per service population in 2030 or 2050 are less than the corresponding efficiency metric, then the proposed Project would be consistent with reduction trajectory the State needs to maintain to achieve its 2030 and 2050 goals (5.2 percent reduction per year) (CARB 2015). Therefore, if the project's emissions are determined to be on this trajectory based on compliance with the 2030 and 2050 GHG emissions per service population goal, it would not be anticipated to interfere with the State's long-term GHG reduction goals.

Consistent with the results of the evaluation of potential impacts related to global climate change that were disclosed in the Draft SEIR circulated for public review January 14 through February 29, 2016, the FCI Lands GPA will result in cumulatively considerable emissions in the horizon years of 2020, 2030 and 2050, thus resulting in cumulatively significant impacts. See Table GR-1.1 for the determination of Project Service Populations. Table GR-1.2 displays the results of the efficiency metric analysis. Total proposed Project mitigated emissions are taken from Tables 2.15-2 and 2.15-3 of the FCI Lands GPA SEIR, pages 2.15-14 and 2.15-15.

TABLE GR-1.1 – FCI SERVICE POPULATION

	Baseline	Horizon Years		
	2013	2020	2030	2050
Housing Units	172,124	194,536	208,698	237,021
Increase over 2013		22,412	36,574	64,897
Proportion of FCI units in 2050				10%
Cumulative Housing Units Built		2,157	3,519	6,245
Persons per household*		2.82	2.82	2.82
Resident Population		6,082	9,925	17,611
Commercial Acres	6,976	10,699	16,017	26,653
Increase over 2013		3,723	9,041	19,677
Proportion of FCI units in 2050				1%
Cumulative Comm. Acres Constructed		49	120	261
Employment Density**		5.70	6.10	6.40
Employee Population		281	732	1,670
Service Population		6,363	10,656	19,281

Notes:

* 2011 GPU PEIR

** Series 13 Regional Growth Forecast, SANDAG, 10/2013;
employees per commercial acre

TABLE GR-1.2 – FCI EFFICIENCY RATING PER HORIZON YEAR

	Horizon Years		
	2020	2030	2050
Mitigated Emissions (MT CO ₂ e/yr)	38,167	97,893	178,534
Service Population (SP)	6,363	10,656	19,281
Efficiency (Emissions/SP/yr)	6.0	9.2	9.3

Global Response 4 (GR-4) Land Use Map Planning Criteria

Numerous comments (L-25 through L-33) reference Planning Criteria b) through f) which are from the “Department Reasons for Recommendation” from the staff report to the Board of Supervisors when they considered this Project on June 25, 2014 and endorsed land use designations. [This staff report is available on the Project web site at:

<http://www.sandiegocounty.gov/content/dam/sdc/dplu/advance/docs/FCI/bos/staffreport.pdf>

The Planning Criteria were used to assist County Staff with the development of the proposed Project and the Project alternative land use designations. All of these criteria included the qualifying term “typically,” to account for the general applicability of these criteria; this qualification is not included in the paraphrased planning criteria comments.

The planning criteria are not discussed in the SEIR nor are they used to determine the significance of potential impacts; therefore the opinions expressed in the comments do not raise an issue with information provided or the impact determinations made in the Draft SEIR.

Global Response 5 (GR-5) Infrastructure Installation on USFS Lands

The ability to permit infrastructure installation or vegetation management activities on CNF Lands managed by the U.S. Forest Service (USFS) is wholly within the discretion of the USFS and not the County of San Diego. The SEIR does not propose the installation of infrastructure or vegetation management on CNF as a means to facilitate development associated with the FCI lands nor provide mitigation for their development. Further, because national forest lands are not subject to local land use authority or are the Cleveland National Forest Lands a part of the FCI Project areas, the requested policy statement is not within the purview of the proposed FCI Lands GPA.

Global Response 6 (GR-1) CEQA Guidelines: Appendix F, Energy Conservation

Appendix F to the CEQA Guidelines requires that “EIRs include a discussion of the potential energy impacts of proposed projects, with particular emphasis on avoiding or reducing inefficient, wasteful and unnecessary consumption of energy.” As discussed in the first paragraph of Appendix F, Section II, “[in] many instances specific items may not apply...” It is not clear in the CEQA Guidelines that Appendix F is intended for programmatic EIRs since this requirement appears to be more appropriate for project level EIRs. Some examples of where these Guidelines do not necessarily apply include sections requiring CEQA documents to identify specific energy reductions, efficiencies and conservation in construction, operation and maintenance activities. The FCI Lands GPA is programmatic in nature in that it assigns land use designations only, and does not include any specific information that would be associated with actual development projects. Therefore, the FCI Lands GPA relies on a programmatic SEIR (PSEIR) where separate environmental review could be necessary for the analysis of specific development projects that follow the adoption of this GPA.

This FCI Lands GPA is proposing changes to existing General Plan designations that establish allowable land uses and intensities of development. The FCI Lands GPA cannot predict when and how any future development will occur, but can analyze the maximum potential development on a programmatic scale according to the intensities allowed by the land use designations assigned. Therefore, this PSEIR does not analyze building-specific impacts or efficiencies associated with construction, maintenance or operation activities because they are still unknown at this time. Rather, this PSEIR relies on General Plan policies, mitigation/implementation measures, ordinances, design guidelines and procedures to establish requirements for future development that must be met prior to receiving a building permit. Potential impacts associated with subsequent building-specific activities are addressed through state, regional and local laws, regulations, and mitigation programs applied at the project level (e.g., construction, operation and maintenance activities).

The applicable, required information related to Appendix F of the CEQA Guidelines was included within various sections of the SEIR, including but not limited to, the Project Description, Environmental Setting, and evaluations of potential impacts throughout Chapter 2. Based on comments to the Draft SEIR and for ease of reader information, the County has summarized the Energy Use Analysis into this Global Response to Comment (GR-6). GR-6 demonstrates how the requirements of CEQA Guidelines, Appendix F are met. It should be noted that this information provides additional clarification and information regarding energy usage.

SEIR subsection 2.14.3.8, Energy, concluded that implementation of the proposed Project would result in potentially significant direct and cumulative impacts; however, those impacts would be reduced to below a level of significance through implementation programs (2011 General Plan goals/policies) and mitigation measures from the General Plan Update PEIR. Therefore, no additional measures would be required. That conclusion remains unchanged by this additional summary of information pertaining to energy conservation and usage.

The text below sets forth each provision of CEQA Guidelines Appendix F in italics, followed by an explanation how the information in the PSEIR responds to that suggested topic. Appendix F itself explains that in many cases specific items may not apply, and that the listed items should be considered in an EIR when they are applicable or relevant. Consistent with that guidance, in some instances the responsive information consists of a statement that the item in question does not apply, with a reference back to the discussion in the first two paragraphs of this Global Response.

A. *Project Description may include the following items:*

1. Energy consuming equipment and processes which will be used during construction, operation and/or removal of the project. If appropriate, this discussion should consider the energy intensiveness of materials and equipment required for the project.

Response: This is not applicable. The FCI Lands GPA proposes changes to existing General Plan designations that establish allowable land uses and intensities of development and cannot predict energy intensiveness of materials and equipment required by unknown subsequent development projects, because it is not known at this time when or if development of parcels would occur. This PSEIR analyzes the maximum potential development on a programmatic scale according to the intensities allowed by the land use designations assigned (refer to the first two paragraphs at the beginning of this Response to Comment).

This PSEIR does include policies that would be applied to subsequent projects implemented under the overall project. The applicable policies and mitigation measures concerning construction and operation of subsequent development projects are detailed below.

- Subsection 2.14.4.6 includes Policy COS-17.2 requires recycling, reduction and reuse of construction and demolition debris.
- Subsection 2.15.4.1 includes Policy COS-10.7 that concerns the construction and demolition debris recycling facilities and mitigation measures CC-1.1 to update the County Green Building Program; CC-1.16 that requires development of a strategic energy plan that includes a component to monitor/reduce energy demand in County facilities; CC-1.17 to develop and implement a County operations recycling program; CC-1.18 to develop a County operations water conservation program and CC-1.19 to require the County to make revisions to the Zoning Ordinance to facilitate recycling salvaged concrete, asphalt, and rock.

2. Total energy requirements of the project by fuel type and end use.

Response: Total electrical and natural gas energy requirements are provided in SEIR Appendix F (GHG Calculations), segregated according to residential, commercial and

industrial uses. The table on F-23 in Appendix F, which is repeated below, provides forecasts for buildout of the Project years 2020, 2030 and 2050.

ACTIVITY DATA			Existing	Proposed Project		
SECTOR	SUBSECTOR	UNITS/YEAR	2013	2020	2030	2050
ENERGY						
	RESIDENTIAL ELECTRICITY	KWH	1,362,545,339	1,539,960,261	1,652,065,167	1,876,274,977
	RESIDENTIAL DIRECT ACCESS ELECTRICITY	KWH	6,722,204	7,597,492	8,150,569	9,256,722
	RESIDENTIAL NATURAL GAS	THERMS	37,097,579	41,927,997	44,980,241	51,084,728
	RESIDENTIAL DIRECT ACCESS NATURAL GAS	THERMS	8,201	9,269	9,944	11,294
	RESIDENTIAL SUBTOTAL					
	COMMERCIAL ELECTRICITY	KWH	927,871,044	1,423,010,270	2,130,352,021	3,545,035,523
	COMMERCIAL DIRECT ACCESS ELECTRICITY	KWH	112,201,898	172,076,125	257,610,734	428,679,952
	COMMERCIAL NATURAL GAS	THERMS	20,132,967	30,876,510	46,224,427	76,920,262
	COMMERCIAL DIRECT ACCESS NATURAL GAS	THERMS	3,169,615	4,861,014	7,277,299	12,109,869
	COMMERCIAL SUBTOTAL					
	INDUSTRIAL ELECTRICITY	KWH	279,712,413	420,646,346	621,980,536	1,024,648,916
	INDUSTRIAL DIRECT ACCESS ELECTRICITY	KWH	128,244,582	192,860,997	285,170,161	469,788,489
	INDUSTRIAL NATURAL GAS	THERMS	4,714,542	7,089,978	10,483,458	17,270,418
	INDUSTRIAL DIRECT ACCESS NATURAL GAS	THERMS	32,996,868	49,622,439	73,373,254	120,874,884
	INDUSTRIAL SUBTOTAL					

In addition, the table on page F-30 of SEIR Appendix F (repeated below) includes total electrical requirements for electric vehicles based an average of 29 kilowatt-hours per 100 vehicle miles traveled.

Transportation Emissions - Proposed Project

2020		County-Specific Weighted Average					
Category	% VMT (from EMFAC 2014)	VMT	Average kwh/100 miles	Emission Factors (g CO2/mi)	Emission Factors (g CH4/mi)	Emission Factors (g N2O/mi)	Emissions (MT CO2e)
Diesel	6%	3,486,019		1316.70	1.15E-01	3.90E-02	4,639.477
Electric	1.7%	969,036	29	0.84	3.37E-05	7.14E-06	0.820
Gasoline	92%	51,989,905		410.01	1.47E-02	6.04E-03	21,427.206
Totals		56,444,960					26,068

2030		County-Specific Weighted Average					
Category	% VMT (from EMFAC 2014)	VMT	Average kwh/100 miles	Emission Factors (g CO2/mi)	Emission Factors (g CH4/mi)	Emission Factors (g N2O/mi)	Emissions (MT CO2e)
Diesel	7%	16,559,288		1099.64	8.40E-02	3.62E-02	18,418.577
Electric	8.9%	22,063,614	29	0.71	3.37E-05	7.14E-06	15.707
Gasoline	84%	209,977,293		236.82	8.81E-03	2.74E-03	49,938.737
Totals		248,600,196					68,373

2050		County-Specific Weighted Average					
Category	% VMT (from EMFAC 2014)	VMT	Average kwh/100 miles	Emission Factors (g CO2/mi)	Emission Factors (g CH4/mi)	Emission Factors (g N2O/mi)	Emissions (MT CO2e)
Diesel	7%	33,761,647		1116.20	7.57E-02	3.67E-02	38,110.480
Electric	9.5%	44,575,151	29	0.71	3.37E-05	7.14E-06	31.733
Gasoline	83%	390,044,312		221.17	8.14E-03	2.34E-03	86,609.621
Totals		468,381,110					124,752

Notes:

VMT = vehicle miles traveled; see Table 3 of Appendix

kWh = kilowatt-hours

3. Energy conservation equipment and design features.

Response: As previously detailed, the FCI Lands GPA proposes changes to existing General Plan designations that establish allowable land uses and intensities of development and cannot predict the actual equipment and design features of future development projects because it is not known at this time when or if development of parcels would occur. This PSEIR analyzes the maximum potential development on a programmatic scale according to the intensities allowed by the land use designations assigned (refer to the first two paragraphs at the beginning of this Global Response to Comment).

However, identified below, along with the section where they are referenced in the SEIR, are the applicable policies and mitigation measures concerning energy conservation requirements for development projects.

- Subsection 2.14.4.8 includes Policy COS-14.7 encourages development projects to use alternative energy sources; Policies COS-15.1 through COS-15.5 require new and existing buildings to maximize energy efficiency. The related mitigation measures identified in this section include USS-8.1, which reduces the need for new or expanded energy facilities in new development and USS-8.2 and USS-8.3, which reduce energy usage for government operations.
- Subsection 2.15.4.1 includes Policy COS-17.5, which promotes methane recapture in landfills to generate additional energy and Policy COS-18.2, which encourages methane sequestration and other sustainable strategies to produce energy from waste disposal or management sites. This section also includes mitigation measure USS-1.17 to develop and implement a County Operations Recycling Program that includes measures to recover by-product methane to generate electricity.

4. Identification of energy supplies that would serve the project.

Response: GPU FEIR subsection 2.16.1.4 describes the current power and energy resources serving the unincorporated County, which include electricity, natural gas, nuclear energy, and alternative energy sources such as biomass/bio-gas energy, hydroelectric power, solar cells and wind energy. This section further discusses that because energy supply and demand does not differentiate between jurisdictional boundaries, it is difficult to discuss energy in terms of the Project area alone. Therefore, generally the data presented in the GPU FEIR represents current energy conditions for the entire San Diego County region.

FCI Lands GPA SEIR subsection 2.14.1 provides updated existing conditions information that has evolved since adoption of the 2011 General Plan for utilities and service systems within the unincorporated County as relates to the Project areas. In addition, FCI Lands GPA SEIR Project Description, Table 1-6, identifies regional energy and utility projects.

5. Total estimated daily vehicle trips to be generated by the project and the additional energy consumed per trip by mode.

Response: SEIR Appendix D, Table D-2, identifies the estimated vehicular trips generated by the FCI Lands GPA for each community within the Project area, in average daily vehicle trips (ADTs). SEIR Appendix D (Attachment A), Traffic Impact Assessment, subsection 4.0 concludes that of the five communities where deficient roadway segments are forecast (Alpine, Desert, Jamul, Mountain Empire and Ramona), the community of Alpine will likely be most affected by the Project.

Table 4 (page F-3) of the SEIR Appendix F, GHG Calculations compares the buildout (year 2050) vehicle miles traveled (VMT) for the proposed Project, existing General Plan (No Project alternative) and the 2011 General Plan. This information is repeated below.

Table 4 – Estimated Build-out VMT in FCI-land and Unincorporated Area for Proposed Project

	Build-Out Daily VMT (2050)	Build-Out Annual VMT (2050)
Build Out VMT in FCI-Lands		
SEIR Proposed Project	1,283,236	468,381,110
Existing GP - No Project	1,418,578	517,781,064
Recommended Project 2011	615,327	224,594,364
Build Out VMT in non-FCI- Lands ^a		
Cumulative Projects	1,423.65	519,631
Build Out VMT in Entire Unincorporated Area		
Recommended Project 2011	24,544,826	8,958,861,490
With SEIR Proposed Project	25,212,735	9,202,648,236
With No Project	25,348,077	9,252,048,190
With No Project + Cumulative Projects	25,867,708	9,441,713,547
Source: Data compiled by Ascent Environmental, Inc. in 2015		
^a Included for informational purposes only.		

In addition, the SEIR Appendix F tables on pages F-27 and F-30 identify the breakdown of VMT by type of fuel: diesel (6%), electric (1.7%) and gasoline (92%). These tables are repeated below.

2020 Transportation-related Emissions (Unmitigated and Mitigated)

Calendar Year 2020			County-Specific Weighted Average							
Category	% VMT (from EMFAC 2014)	VMT	Average kw-hrs/100 miles	Emission Factors (g CO2/mi)	Emission Factors (g CH4/mi)	Emission Factors (g N2O/mi)	Emissions (MT CO2)	Emissions (MT CH4)	Emissions (MT N2O)	Total Emissions (MT CO2e)
Diesel	6%	3,486,025		1185.03	0.12	0.04	4,131.030	0.401	0.136	4,180
Electric	1.7%	969,037	29.00	0.84	0.00	0.00	0.818	0.000	0.000	1
Gasoline	92%	51,989,997		364.78	0.01	0.01	18,965.015	0.764	0.314	19,076
Totals		56,445,060								23,257

Calendar Year 2020			County-Specific Weighted Average							
Category	% VMT (from EMFAC 2014)	VMT	Average kw-hrs/100 miles	Emission Factors (g CO2/mi)	Emission Factors (g CH4/mi)	Emission Factors (g N2O/mi)	Emissions (MT CO2)	Emissions (MT CH4)	Emissions (MT N2O)	Total Emissions (MT CO2e)
Diesel	6%	3,486,025		1316.70	0.13	0.04	4,590.033	0.446	0.136	4,641
Electric	1.7%	969,037	29.00	0.84	0.00	0.00	0.818	0.000	0.000	1
Gasoline	92%	51,989,997		410.01	0.01	0.01	21,316.677	0.764	0.314	21,427
Totals		56,445,060								26,069

LCFS Reduction	10%	36.48
Advanced Clean Cars Reduction	2.40%	8.75
		45.23

Conversion Factors	
1	MT
1000000	g

Transportation Emissions - Proposed Project

2020		County-Specific Weighted Average					
Category	% VMT (from EMFAC 2014)	VMT	Average kwh/100 miles	Emission Factors (g CO ₂ /mi)	Emission Factors (g CH ₄ /mi)	Emission Factors (g N ₂ O/mi)	Emissions (MT CO ₂ e)
Diesel	6%	3,486,019		1316.70	1.15E-01	3.90E-02	4,639.477
Electric	1.7%	969,036	29	0.84	3.37E-05	7.14E-06	0.820
Gasoline	92%	51,989,905		410.01	1.47E-02	6.04E-03	21,427.206
Totals		56,444,960					26,068

2030		County-Specific Weighted Average					
Category	% VMT (from EMFAC 2014)	VMT	Average kwh/100 miles	Emission Factors (g CO ₂ /mi)	Emission Factors (g CH ₄ /mi)	Emission Factors (g N ₂ O/mi)	Emissions (MT CO ₂ e)
Diesel	7%	16,559,288		1099.64	8.40E-02	3.62E-02	18,418.577
Electric	8.9%	22,063,614	29	0.71	3.37E-05	7.14E-06	15.707
Gasoline	84%	209,977,293		236.82	8.81E-03	2.74E-03	49,938.737
Totals		248,600,196					68,373

2050		County-Specific Weighted Average					
Category	% VMT (from EMFAC 2014)	VMT	Average kwh/100 miles	Emission Factors (g CO ₂ /mi)	Emission Factors (g CH ₄ /mi)	Emission Factors (g N ₂ O/mi)	Emissions (MT CO ₂ e)
Diesel	7%	33,761,647		1116.20	7.57E-02	3.67E-02	38,110.480
Electric	9.5%	44,575,151	29	0.71	3.37E-05	7.14E-06	31.733
Gasoline	83%	390,044,312		221.17	8.14E-03	2.34E-03	86,609.621
Totals		468,381,110					124,752

B. Environmental Setting may include existing energy supplies and energy use patterns in the region and locality.

Response: The GPU FEIR, Project Description subsection 1.14.2.3 includes a discussion of Regional Energy and Utility Projects and Table 1-9 provides a list of regional energy projects. The FCI Lands GPA provides updated information in subsection 1.9.1.5 and Table 1-6.

C. Environmental Impacts:

The Guidelines under the environmental impacts category are more applicable to development projects where the actual construction, operation and maintenance activities can be analyzed. In most instances, this Project to change General Plan land use designation change, which does not include any development, is not applicable. However, information is provided below that shows the sections in the SEIR that address these impacts on a programmatic level.

1. The project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project including construction, operation, maintenance and/or removal. If appropriate, the energy intensiveness of materials maybe discussed.

Response: This analysis of energy requirements does not apply to the Project because the FCI Lands GPA proposes changes to existing General Plan designations that establish allowable land uses and intensities of development and cannot predict actual energy requirements for the construction, operation, and maintenance of future development projects. In addition, energy use efficiencies are not identified because they are unknown at the programmatic level of this SEIR. This PSEIR analyzes the maximum potential development on a programmatic scale according to the intensities allowed by the land use designations assigned (refer to the first two paragraphs at the beginning of this Global Response to Comment).

However, the energy forecast requirements, based on the potential buildout that the land use designation changes would allow, are provided in SEIR Appendix F, GHG Calculations, for the following sectors:

- Electric and natural gas – requirements segregated according to residential, commercial and industrial lands in kilowatt-hours and therms (see pages F-23 to F-24).

ACTIVITY DATA			Existing	Proposed Project		
SECTOR	SUBSECTOR	UNITS/YEAR	2013	2020	2030	2050
ENERGY						
	RESIDENTIAL ELECTRICITY	KWH	1,362,545,339	1,539,960,261	1,652,065,167	1,876,274,977
	RESIDENTIAL DIRECT ACCESS ELECTRICITY	KWH	6,722,204	7,597,492	8,150,569	9,256,722
	RESIDENTIAL NATURAL GAS	THERMS	37,097,579	41,927,997	44,980,241	51,084,728
	RESIDENTIAL DIRECT ACCESS NATURAL GAS	THERMS	8,201	9,269	9,944	11,294
	RESIDENTIAL SUBTOTAL					
	COMMERCIAL ELECTRICITY	KWH	927,871,044	1,423,010,270	2,130,352,021	3,545,035,523
	COMMERCIAL DIRECT ACCESS ELECTRICITY	KWH	112,201,898	172,076,125	257,610,734	428,679,952
	COMMERCIAL NATURAL GAS	THERMS	20,132,967	30,876,510	46,224,427	76,920,262
	COMMERCIAL DIRECT ACCESS NATURAL GAS	THERMS	3,169,615	4,861,014	7,277,299	12,109,869
	COMMERCIAL SUBTOTAL					
	INDUSTRIAL ELECTRICITY	KWH	279,712,413	420,646,346	621,980,536	1,024,648,916
	INDUSTRIAL DIRECT ACCESS ELECTRICITY	KWH	128,244,582	192,860,997	285,170,161	469,788,489
	INDUSTRIAL NATURAL GAS	THERMS	4,714,542	7,089,978	10,483,458	17,270,418
	INDUSTRIAL DIRECT ACCESS NATURAL GAS	THERMS	32,996,868	49,622,439	73,373,254	120,874,884
	INDUSTRIAL SUBTOTAL					

EMISSIONS (MT CO ₂ e / YEAR)		Existing	Proposed Project		
SECTOR	SUBSECTOR	2013	2020	2030	2050
ENERGY					
	RESIDENTIAL ELECTRICITY	381,365	378,029	405,549	460,588
	RESIDENTIAL DIRECT ACCESS ELECTRICITY	1,881	1,865	2,001	2,272
	RESIDENTIAL NATURAL GAS	250,334	282,930	303,527	344,720
	RESIDENTIAL DIRECT ACCESS NATURAL GAS	55	63	67	76
	RESIDENTIAL SUBTOTAL	633,636	662,887	711,143	807,656
	COMMERCIAL ELECTRICITY	259,703	349,320	522,958	870,235
	COMMERCIAL DIRECT ACCESS ELECTRICITY	31,404	42,241	63,238	105,232
	COMMERCIAL NATURAL GAS	135,857	208,355	311,922	519,058
	COMMERCIAL DIRECT ACCESS NATURAL GAS	21,389	32,802	49,107	81,717
	COMMERCIAL SUBTOTAL	448,353	632,718	947,226	1,576,242
	INDUSTRIAL ELECTRICITY	78,289	103,260	152,684	251,531
	INDUSTRIAL DIRECT ACCESS ELECTRICITY	35,895	47,343	70,004	115,324
	INDUSTRIAL NATURAL GAS	31,814	47,843	70,742	116,541
	INDUSTRIAL DIRECT ACCESS NATURAL GAS	222,663	334,852	495,123	815,664
	INDUSTRIAL SUBTOTAL	368,660	533,299	788,552	1,299,059

- Electric use by vehicles – requirements by kilowatts-hours per 100 vehicle miles for years 2020, 2030 and 2050 (see page F-30). [See tables provided above for Appendix F criterion A.5, Total estimated daily vehicle trips to be generated by the project).
- Potable water – requirements based on million gallons per year for years 2020, 2030 and 2050 (see page F-32).

Potable Water

	Million gallons/year	kWh/MG	MWh/year	MTCO ₂ e/yr	Increase MTCO ₂ e	MTCO ₂ e Proposed Project
2013	24,400	12,700	309,880	90,501		
2013 33% RPS	24,400	12,700	309,880	75,795		
2020	27,577	12,700	350,226	102,284	11,783	1,134
2030	29,319	12,700	372,348	91,074	15,279	1,470
2050	32,803	12,700	416,593	101,896	26,101	2,512

2. The effects of the project on local and regional energy supplies and on requirements for additional capacity.

Response: SEIR subsection 2.14.3.8 determined that development of land uses as designated by the proposed Project would require energy for construction and operation, thereby increasing energy demand in the county. The subsection further determined that the increase in energy demand would affect energy facilities located within the unincorporated county as well as energy facilities that serve unincorporated areas but are located outside the county. This subsection further determined that to accommodate this projected increase in energy demand, energy facilities would need to be constructed or expanded. In addition, regional energy projects that will be constructed within the region to meet future energy demands have been identified in the General Plan Update PEIR and also in the Project Description, subsection 1.9.1.5

(Regional Energy and Utility Projects) of this FCI Lands GPA SEIR. These projects include new energy production facilities, transmission facilities, or expansion of existing facilities.

In addition, SEIR Appendix F includes calculations of the increased energy consumption based on buildout of the Project by identifying the increase in the number housing units (see Table 7 on page F-6) and the changes in acres of commercial and industrial land uses (see Attachment A to SEIR Appendix F on pages F-15 through F-19).

Table 7 – Housing Units and Population Data

Scenario	GP Build-Out	
	Housing Units	Population
Unincorporated Area in 2005	162,381	460,247
Recommended Project (RP) 2011 between 2005 and build-out	72,683	202,761
Difference between RP2011 and FCI No Project	10,806	30,479
Difference between RP2011 and SEIR Proposed Project	1,957	5,520
Difference between Existing GP and other Cumulative Projects (Excluding FCI Updates)	6,213	17,524
GP Update - No Project	245,870	693,487
GP Update with Proposed Project	237,021	668,528
GP Update with No Project + Cumulative Projects	252,083	711,011

3. The effects of the project on peak and base period demands for electricity and other forms of energy.

Response: In SEIR Appendix F, GHG Calculations, the total base electrical and natural gas energy requirements are shown in the tables on pages F-23 through F-32 and are broken down according to components such as residential, commercial and industrial land uses, electric vehicles and water and wastewater systems. However, SEIR subsection 2.14.3.8 determined that direct and cumulative impacts would occur with future development of the Project areas because development of land uses as designated by the proposed Project would require energy for construction and operation, thereby increasing energy demand in the county.

This subsection further determined that “to accommodate the projected increase in energy demand, energy facilities would need to be constructed or expanded, which would have the potential to cause significant environmental effects.” However this guideline to identify the effects on peak demands is not applicable because more specific information on actual development projects is necessary to determine peak demands. This PSEIR analyzes the maximum potential development on a programmatic scale according to the intensities allowed by the land use designations assigned. This information would be analyzed in the environmental analyze of future development projects, which are generally unknown at this time and are not part of this GPA (refer to the first two paragraphs at the beginning of this Response to Comment).

4. The degree to which the project complies with existing energy standards.

Response: An analysis of actual development projects, which are not part of this GPA, is necessary to determine compliance with energy standards. At a programmatic level, the SEIR identifies General Plan policies and mitigation measures that establish requirements for these projects; however, cannot measure how well the development projects actually comply with existing energy standards.

These policies and the mitigation measure encourage alternative energy sources, energy efficiency, green building programs and energy recovery for development. Adherence to these policies will reduce impacts associated with new or expanded energy facilities. The applicable policies and mitigation measures that establish requirements for projects to comply with existing energy standards are identified below, along with the subsection where they are referenced in the FCI Lands GPA SEIR.

- Subsection 2.14.4.8 includes policies that require adherence with existing standards, such as: COS-15.1 Design and Construction of New Buildings; COS-15.3 Green Building Programs; COS-15.4 Title 24 Energy Standards; COS-15.5 Energy Efficiency Audits. Also included is mitigation measure USS-8.1 to implement the County Green Building Program.
- Subsection 2.15.4.1 identifies Policy COS-17.1 that requires reduction, reuse or recycling of solid waste to divert solid waste from landfills in compliance with State law.

5. The effects of the project on energy resources.

Response: At a programmatic level, implementation of the policies and mitigation measures identified in paragraph 4 above would reduce the need for new or expanded energy facilities. SEIR subsection 2.14.3.8 describes potential direct and cumulative impacts on energy supplies and facilities as pertains to the Project areas.

6. The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

Response: The transportation-related energy requirements are included within Appendix F of the FCI Lands GPA SEIR. SEIR subsection 2.14.3.8 determined that direct and cumulative impacts would occur with future development of the Project areas because development of land uses as designated by the proposed Project would require energy for construction and operation, thereby increasing energy demand in the county. The information provided in in this response is derived from information contained within SEIR Appendix F and including *Table 5 Annual Fuel Consumption Forecasts – SEIR Proposed Project*, which forecasts fuel consumption, by type, based on predicted VMT

The information provides clarification regarding the amount of fuel used based on VMT and fuel type, and goes beyond what is required for the programmatic analysis provided in this SEIR.

Due to the location of the Project area, “efficient transportation alternatives,” such as public transit, would generally not be feasible to implement. The majority of the FCI lands are located within remote areas of the County where development is not anticipated to be “concentrated,” which is reflected in the majority of the land use designations. Due to the nature of where the majority of the FCI lands are located and the land use designations that are primarily 1 DU per 80 acres, the provision of public transit in these areas would not be desirable.

The following General Plan policies and mitigation measures, however, are intended to reduce VMT and, thus, transportation-related energy use:

- Policies
 - Policy LU-5.1: Reduction of Vehicle Trips within Communities
 - Policy LU-5.4: Planning Support
 - Policy LU-10.4: Commercial and Industrial Development
 - Policy M-8.1: Maximize Transit Service Opportunities
 - Policy M-8.2: Transit Service to Key Community Facilities and Services
 - Policy M-8.3: Transit Stops That Facilitate Ridership
 - Policy M-9.2: Transportation Demand Management
- Mitigation:
 - Tra-1.1
 - Tra-1.6
 - Tra-6.1
 - Tra-6.2
 - Tra-6.3
 - Tra-6.4
 - Tra-6.5

Transportation requirements for this Project have been determined based on the potential buildout that would be allowed by the land use designations proposed by this Project. SEIR Appendix F, GHG Calculations, Table 3 on page F-14 identifies the total transportation requirements in vehicle miles travelled (VMT) according to each land use designation. The Transportation section (pages F-1 through F-3) of SEIR Appendix F estimates annual transportation emissions (vehicle emission factors multiplied by annual VMT in the unincorporated county). These calculations have been reproduced above and consider energy efficiencies such as:

- Future impact of regulations and policies such as the Advanced Clean Cars program and the Low Carbon Fuel Standard, and
- Electric vehicle mode share, in addition to diesel and gasoline vehicles.

D. Mitigation Measures may include:

1. Potential measures to reduce wasteful, inefficient and unnecessary consumption of energy during construction, operation, maintenance and/or removal. The discussion should explain why certain measures were incorporated in the project and why other measures were dismissed.

Response: Identified below are the applicable policies and mitigation measures and the subsection where they are referenced in the FCI Lands GPA SEIR. There is not a discussion of measures that were dismissed because this list is all inclusive to address the wide range of potential development projects, which as unknown at this time.

- Subsection 2.3.4.2 identifies Policies COS-14.10; COS-15.1; COS-15.3 through COS-15.5; COS-14.2 and COS-14.9 that encourage mixed uses and alternative transportation to reduce energy demand and apply renewable energy and energy-efficiency practices to future development and to County facilities. This subsection also identifies mitigation measures Air-2.1 through Air-2.5 that would encourage use of low-emission vehicles, ensure on-going County municipal operations result in minimal carbon emissions associated with vehicle usage, provide incentives to promote the siting or use of clean air technologies or prevent release of construction-related pollutants. Also, Air-2.12 promotes LEED Silver standards or other equivalent Green Building rating systems into County facilities.
- Subsection 2.14.4.1 identifies Policy LU-9.4 that prioritizes infrastructure improvements and the provision of public facilities in community cores; Policy LU-12.1 that requires concurrency of infrastructure and services with development; Policy LU-14.1 that requires maintenance of adequate services with development and Policies LU-14.2 through LU-14.4 that require adequate wastewater facility plans, disposal, treatment facilities and sewer facilities. Adherence to these policies will reduce impacts associated with exceedance of San Diego Regional Water Quality Control Board (RWQCB) wastewater treatment requirements. This subsection also identifies mitigation measure USS-1.1 to help ensure that wastewater treatment needs are identified and planned to be proportionate to the provision of adequate facilities; USS-1.2 to help ensure that demand for wastewater treatment does not exceed capacity and USS-1.3 to ensure that the County is meeting RWQCB requirements and that infrastructure is being planned concurrent with development.

2. The potential of siting, orientation, and design to minimize energy consumption, including transportation energy, increase water conservation and reduce solid waste.

Response: Identified below are the applicable policies and mitigation measures and the subsection where they are referenced in FCI Lands GPA SEIR.

- Subsection 2.14.4.1 identifies Policies LU-12.1, LU-12.2 and LU-14.1 through LU-14.4, which require concurrency of infrastructure and services with development, the maintenance of adequate services with development and adequate wastewater facility plans, disposal, treatment facilities, and sewer facilities to reduce impacts associated with exceedance of RWQCB wastewater treatment requirements. Mitigation measure USS-1.3 ensures the County is meeting RWQCB requirements and that infrastructure is being planned concurrent with development.
- Subsection 2.14.4.3 identifies Policy LU-6.5 that ensures development minimizes the use of impervious surfaces and mitigation measures USS 3.1 that encourages conservation oriented design to minimize the need for new stormwater drainage facilities. Implementation of mitigation measure USS-3.2 would minimize the need for new or expanded stormwater facilities and USS-3.3 would provide measures for reducing stormwater runoff.
- Subsection 2.14.4.4 identifies Policies COS-4.1 through COS-4.4 that apply water conservation measures and preserve the quality of local water supply. This subsection also identifies mitigation measures USS-4.2 through USS-4.5 and USS-4.7. Implementation of these measures would potentially reduce future demand on existing water supplies, prevent future discretionary projects in water district areas that require imported water supply in exceedance of existing availability, reduce future demand on water supply in the county, minimize drawdown of groundwater supply, allow for recharge of groundwater storage, reduce future demand of imported water and groundwater, identify and minimize adverse environmental effects on groundwater resources and reduce the potential for exceedance of water availability.
- Subsection 2.15.4.1 identifies Policies COS-15.1 through 15.3 that require new and existing buildings be designed and constructed in accordance with programs that maximize energy efficiency; Policy COS-17.1 that reduces future landfill capacity needs through reduction, reuse or recycling of all types of solid waste generated. This subsection also identifies mitigation measures, such as: CC-1.4 to improve traffic flow to reduce vehicle miles traveled on county roads; CC-1.5 to coordinate with the County Water Authority and other water agencies to achieve efficient water usage; CC-1.6 to divert solid waste from landfills in the region; CC-1.7 to ensure that future development incorporate design features and mitigation measures that minimize energy consumption; CC-1.8 to warrant future development is consistent with the future Climate Change Action Plan; CC-1.9 to retrofit existing buildings for energy efficiency and CC-1.10 to minimize development footprints and maximize natural resource preservation. In addition, subsection 2.14.4.8 identifies Policy COS-15.4 that requires energy efficiency in new construction and Policy COS-15.5 that encourages energy conservation and efficiency in existing development.

3. The potential for reducing peak energy demand.

Response: As discussed in the response provided in the first two paragraphs above, this the FCI Lands GPA does not include specific development projects where peak energy demand could be identified. See also the Response to C. Environmental Impacts, Guideline #3 above, concerning why analysis of peak demand is not applicable for this PSEIR.

However, the FCI Lands GPA does identify General Plan policies and mitigation measures that either require or encourage development to reduce or conserve energy that will ultimately result in a reduction in peak demand. These policies and mitigation measures, which are identified primarily in the FCI Lands GPA SEIR subsections 2.14.4.1, 2.14.4.3 and 2.14.4.4, are discussed in detail in the Responses the Guideline D, Mitigation Measures, for paragraphs D.2 and D.3 above.

In addition, the SEIR Appendix F (page F-20) identifies the forecast demand of buildout of the proposed Project for each energy sector, including residential, commercial and industrial electricity.

4. Alternate fuels (particularly renewable ones) or energy systems.

Response: The emissions calculations in SEIR Appendix F, GHG Calculations, take into account the San Diego Gas & Electric Company's renewable portfolio.

In addition, identified below are the applicable policies and mitigation measures concerning alternative fuels and the subsections where they are referenced in the FCI Lands GPA SEIR.

- Subsection 2.3.4.1 identifies mitigation measure AIR-2.1, which requires incentives, such as preferred parking, to promote use of alternatively fueled vehicles.
- Subsection 2.3.4.2 identifies Policy COS-14.9 that requires projects that generate potentially significant levels of air pollutants to incorporate renewable energy. In addition, mitigation measure Air-2.4 requires incentives to promote clean air technologies through renewable energy sources.
- Subsection 2.14.4.8 identifies Policies COS-15.1 through COS-15-3, which require new buildings be designed and constructed to maximize use of sustainable resources and renewable energy sources. In addition, mitigation measure USS-8.1 requires implementation of the County Green Building Program to maximize the use of sustainable resources.
- Subsection 2.15.4.1 identifies mitigation measure CC-1.16 which requires implementation of a strategic energy plan with measures that utilize renewable

energy systems and increase County fleet fuel efficiency through use of alternative fuels.

5. Energy conservation which could result from recycling efforts.

Response: Identified below are the applicable policies and mitigation measures concerning recycling efforts and the subsection where they are referenced in the FCI Lands GPA SEIR.

- Subsection 2.3.4.2 identifies Policy COS-15.1 that requires new buildings to incorporate the use of sustainable resources and recycled materials.
- Subsection 2.14.4.6 identifies Policies COS-17.1 through COS-17.8 that encourage recycling facilities and require landfill waste management and recycling to reduce impacts associated with insufficient landfill capacity from future development. This subsection also identifies mitigation measures USS-6.2, USS-6.3 and USS-6.8 to increase participation in recycling and reduce solid waste output to reduce demand on solid waste facilities through alternative disposal options.
- Subsection 2.15.4.1 identifies Policies COS-10.7 (recycling of debris) and COS-17.1 (recycling of solid waste materials) and mitigation measure CC-1.17 to develop a County operated recycling program and CC-1.19 to revise the County Zoning Ordinance to facilitate recycling salvage construction waste materials.

E. Alternatives should be compared in terms of overall energy consumption and in terms of reducing wasteful, inefficient and unnecessary consumption of energy.

Response: The comparison of alternatives in terms of energy consumption is shown in the FCI Lands GPA SEIR Chapter 4 and Appendix F.

- SEIR Chapter 4 includes the tables that compare Project alternatives for buildout by lands uses in acres (Tables 4-2 and 4-3) and the number of dwelling units (Table 4-4) and average daily traffic (Table 4-12). These tables facilitate an overall comparison of energy consumption.
- SEIR Appendix F, GHG Calculations, compares the proposed Project, existing General Plan (No Project alternative) and 2011 General Plan based on buildout of the land use maps in the following:
 - Table 4 (page F-3) - vehicle miles traveled;
 - Table 7 (page F-6) – housing units and population data; and
 - Attachment A (pages F-15 through F-19) – buildout of commercial and industrial land uses).

A more specific comparison of overall energy consumption in terms of reducing wasteful, inefficient and unnecessary consumption of energy is not feasible because the FCI Lands GPA proposes changes to existing General Plan designations that establish

allowable land uses and intensities of development and cannot predict when and how any future development will occur. This PSEIR analyzes the maximum potential development on a programmatic scale according to the intensities allowed by the land use designations assigned (refer to the first two paragraphs at the beginning of this Response to Comment).

F. Unavoidable Adverse Effects may include wasteful, inefficient and unnecessary consumption of energy during the project construction, operation, maintenance and/or removal that cannot be feasibly mitigated.

Response: This is not applicable as the FCI Lands GPA proposes changes to existing General Plan designations that establish allowable land uses and intensities of development and cannot predict when and how any future development will occur. This PSEIR analyzes the maximum potential development on a programmatic scale according to the intensities allowed by the land use designations assigned (refer to the first two paragraphs at the beginning of this Response to Comment).

However, SEIR subsection 2.14.3.8 determined that direct and cumulative impacts would occur with future development of the Project areas because development of land uses as designated by the proposed Project would require energy for construction and operation, thereby increasing energy demand in the County. This section further determined that “to accommodate the projected increase in energy demand, energy facilities would need to be constructed or expanded, which would have the potential to cause significant environmental effects.”

G. Irreversible Commitment of Resources may include a discussion of how the project preempts future energy development or future energy conservation.

Response: As discussed in the Response provided in “F” above, SEIR subsection 2.14.3.8 determined that direct and cumulative impacts would occur with future development of the Project areas and that energy facilities would need to be constructed or expanded, which would have the potential to cause significant environmental effects.

H. Short-Term Gains versus Long-Term Impacts can be compared by calculating the project’s energy costs over the project’s lifetime.

Response: This criterion does not apply to the FCI Lands GPA because Short-Term Gains versus Long-Term impacts cannot be identified at this time. This Project is not a development project, rather this GPA proposes changes to existing General Plan designations that establish allowable land uses and intensities of development and

cannot predict when and how any future development will occur (refer to the first two paragraphs at the beginning of this Response to Comment).

However, SEIR Appendix F, GHG Calculations, includes an energy forecast comparing existing (2013) demand with forecast demand of the proposed Project in 2020, 2030 and 2050 (see pages F-23 and F-24). In addition, growth in number of housing units, commercial and industrial acres are forecast for the proposed Project; comparing 2013 with 2020, 2030 and 2050 forecast (page F-25).

I. Growth Inducing Effects may include the estimated energy consumption of growth induced by the project.

Response: Growth inducing impacts of the FCI Lands GPA are analyzed in SEIR subsection 3.1. This subsection determines that “growth inducement has the potential to result in an adverse impact if the growth is not consistent with or accommodated by the land use plans and growth management plans and policies for the area affected.” This subsection further determines that the proposed Project land use designations would allow for construction of new housing and other uses in the Alpine CPA at intensities that would require extension of water and sewer services. This subsection further determines that, based on CEQA Guidelines, these environmental effects of induced growth are considered indirect impacts and are considered significant, adverse environmental impacts.

A-1	We are the owners of Windfall Ranch, encompassing 475 acres on Japatul Valley Road in the Alpine area. While our main endeavor on this property is to operate an equestrian boarding facility, it has been our dream to someday facilitate development of part of the property into home sites.	This comment describes the Windfall Ranch property and is an introduction to comments that follow. No further response is required.
A-2	We initially requested 20 acre minimum over the entirety of the property. That did not seem unreasonable to us because our immediate neighbors to the north (Japatul Estates, an extensive development on Larry Lane) are developed on 8 acres and less; and the same is true of our immediate neighbors touching our westernmost boundary across Japatul Valley Road.	This comment expresses the property owner's preference for the Project to assign a 20-acre minimum lot size to his property based on the rationale that development to the north and west is even denser. The County of San Diego acknowledges and appreciates this comment. The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis, but instead comments on the merits of the project. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
A-3	We greatly appreciate the fact that the Alpine Community Planning Group has always supported our request for this classification with unanimity which is unusual, to say the least. The Japatul Valley is a fertile area with plenty of water.	The commenter notes that the Alpine Community Planning Group unanimously recommended a Rural Lands 20 (RL-20) designation for the two referenced two parcels (APNs 524-040-02-00 and 524-040-03-00) which total 120 acres (SANGIS), not 475 acres indicated by the commenter. Both the proposed Project and Alpine Land Use Map Alternatives assign a RL-20 designation for these parcels. The County of San Diego acknowledges and appreciates this comment. The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
A-4	However, the San Diego County Planning Commission did not entirely agree. They recommended that only 120 acres of our holding be allowed the 20 acre minimum classification of RL-20. This recommendation is shown in Figure 4-3A of the Alpine Land Use Map Alternative.	The comment correctly states that the County Planning Commission recommended RL-20 for the two parcels referenced in this letter (APNs 524-040-02-00 and 524-040-03-00) and that these parcels total approximately 120 acres. The County of San Diego acknowledges and appreciates this comment. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.

A-5	<p>While we would prefer the recommendation of the Alpine Planning Group, we can accept the recommendation shown in Figure 4-3A, so long as we can "cluster" lots in our preferred areas near other developments of similar size, and realize a potential of at least 14 lots</p>	<p>While this comment states a preference for a RL-20 designation for all 475 acres of the commenter's property, the commenter shows willingness to support a combination of RL-20 and RL-40 as assigned on the Alpine Land Use Map Alternative. Subdivision under both the RL-20 and RL-40 designations would require development to be clustered in accordance with the County Conservation Subdivision Program.</p> <p>The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis, but instead comments on the merits of the project. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.</p>
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B-1	<p>After reading the draft of the Supplementary Environmental Impact Report, my husband and I are very impressed with the scope and depth of the report and the consistent and coherent vision and analysis of possible regional growth based on 10 fundamental principals intended to guide future growth within the County.</p> <p>We appreciate the leadership of the APG in ensuring that the study for this project has moved forward over recent months.</p>	<p>This comment is an introduction to comments that follow. No further response is required.</p>
B-2	<p>As property owners of a 5-acre parcel on Alpine Blvd near East Willows Road, we want to indicate our support for the "Proposed Project" in the SEIR and our rejection of both the "Mid-density Alternative" and the "Alpine Alternative Land Use Map." We believe that the "Proposed Plan" is the only plan that ensures that the area where our property is located is included in the benefits of development.</p>	<p>This comment expresses the property owners' preference for the Draft SEIR proposed Project, which would assign a Semi-Rural 1 (one dwelling unit per acre) designation to their property. The County of San Diego acknowledges and appreciates this comment. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR, but instead indicates the commenter's preference for the proposed Project. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.</p>
B-3	<p>The "Alpine Alternative" would propose to maintain the current or existing General Plan densities of 1 dwelling unit per 4 acres. This would ensure that the existing inadequate roadway widths, dead-end roads, one-way roads, and gated communities would continue to impair emergency access in this area. In the absence of the benefits of "Proposed Plan" by the County, we will continue to be unsafe when faced with an emergency.</p>	<p>This comment implies that a higher density than the current density of one dwelling unit per four acres is necessary to resolve existing issues for the area, such as "inadequate roadway widths, dead-end roads, one-way roads, and gated communities". The County of San Diego acknowledges this concern; however, the comment does not raise an issue concerning the sufficiency of the analysis in the Draft EIR. As discussed in SEIR Chapter 4 subsection 4.4.2.13, with implementation of mitigation measures identified in subsection 2.13.4, buildout of the Alpine Alternative would result in existing inadequate roadway widths, dead-end roads, and one-way roads, and gated communities continuing to occur in the unincorporated County, all of which have the potential to impair emergency access. However, these potentially significant direct and cumulative impacts to emergency access would be reduced to below a level of significance with implementation of the mitigation measures identified in SEIR subsection 2.13.4, in addition to compliance with applicable regulations. Therefore, mitigation measures Tra-1.4, Tra-4.2 and Tra-4.4, in addition to compliance with applicable regulations, would reduce impacts with respect to</p>

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		road conditions and emergency access to a less than significant level. Mitigation measure Tra-1.4 will ensure that appropriate site design and mitigating measures are applied to prevent road hazards associated with future development. Mitigation measure Tra-4.2 would require new development meet Building and Fire Codes, including secondary access requirements and construction of fire apparatus access roads that are designed and maintained to support the imposed loads of fire apparatus. Mitigation measure Tra-4.4 would require subdivisions meet design and accessibility standards. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
B-4	The second major concern about the alternative plans is that our parcel and those around us are not included in the improvement of water quality standards as planned in the "Proposed Plan." As the report indicated, "Violation of ground water quality standards by designating land uses that would be ground water dependent in areas currently exposed to ground water contamination."	This comment expresses opposition to retaining the current one dwelling unit per 4 acre density because the property would not benefit from "the improvement of water quality standards as planned in the 'Proposed Plan'". This comment addresses the policies behind the Project and does not raise an issue with respect to the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
B-5	In conclusion, the "Proposed Plan" for East Alpine is the only plan that ensures that the benefits of development will be based on the 10 guiding principals for future development of Alpine. Ensuring the safety of all through well planned roads and emergency access is critical to us, and access to quality water is essential in any plan for the future.	Similar to Comment B-2, this comment expresses the property owners' preference for the Draft SEIR proposed Project and does not raise an issue with respect to the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
B-6	We believe that those who support the "Mid-density Plan" or the "Alpine Alternative Land Use Map" are not guided by the 10 sound principals underlying the proposed future development of Alpine. Self interest of a few cannot prevail over the consistent and coherent vision of regional growth.	Please refer to the Response to Comments for Comments B-2 and B-5.

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C-1	For the following reasons we again request RL20 in the Japatul lane area of Alpine, and object to the RL40 designation as recommended by the County Planning and Development department.	This commenter requests a RL-20 (Rural Lands 20 or one dwelling unit per 20 acres) designation for her property and raises an objection to a RL-40 designation (Rural Lands 40 or one dwelling unit per 40 acres). The Draft SEIR proposed Project assigns a RL-20 designation to the commenter's property; the comment does not raise an issue concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
C-2	There is no significant impact in the SEIR, and the draft recirculated SEIR with an RL20 designation.	The County does not agree that that the Draft SEIR does not raise a significant impact with assigning a RL-20 designation for the commenter's property. While the Draft SEIR does not identify impacts specific to the commenter's property, the Draft SEIR evaluates potential environmental impacts resulting from this proposed Project. Table SEIR S-2 provides a summary of Project impacts and SEIR Chapter 7 identifies policies and mitigation measures that would minimize potentially significant environmental impacts resulting from implementation of the proposed Project.
C-3	The RL20 designation has consistently been upheld and approved by the Alpine Community Planning Group throughout many meetings over the past several years, as well as recommended to the county in the draft SEIR and Recirculated SEIR.	The commenter notes that the Alpine Community Planning Group consistently approved a RL-20 designation. The comment does not raise an issue concerning the sufficiency of the Draft SEIR's analysis, but concerns the commenter's preference for the RL-20 designation. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Refer to Response C-1.
C-4	The Japatul area is part of the Alpine community, and not remote or removed back country area.	This comment indicates that the "Japatul area is part of the Alpine community, and not remote or removed back country area". The County agrees that the subject property is within the Alpine Community Planning Area, which is generally not considered in the back country area of San Diego County. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.

C-5	The downsizing to the RL40 designation would create hardship, reduce property value, and degradation of the area insuring future blight. Almost all the petitioning owners of properties on Japatul are seniors over the age of 65. Directly and cumulatively the RL40 designation would impact the quality, character and vitality of the Japatul lane area. RL 20 would allow the ability to retain and enhance the rural character and economy of the Japatul and Alpine area.	This comment asserts that a lower density RL-40 designation would create hardship, reduce property value and cause degradation to the area. The comment expresses the commenter's opinion that impacts will occur and will be included in the administrative record that is considered by the decision-makers in evaluating the Project.
C-6	We respectfully ask your favorable consideration and grant us the deserved RL20 designation.	This comment asks for favorable consideration of a RL-20 designation. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
C-7	I did not address concerns of the Forest Service as we are tax paying private property owners and not indentured buffers of the National Forest. And though not as financially lucrative, we are perhaps the better stewards of the land and neighbors, than SRPL	This comment contends that the private property owners are better stewards of the land than "SRPL"; however, the comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
C-8	As to the concern of wildfires, we are in a high fire area, as is most of the county now, not just Japatul and not just Alpine. But during the last big fire, prior to staging at Viejas, the Fire Fighters staged at the end of Japatul Lane as the topography and geography allow it. RL20 is the deserved designation for our area.	The County does not concur that the wildfire risk should not be considered when assigning a land use designation. Wildfire risk is considered in conjunction with other General Plan planning principles when assigning land use designations, such as the General Plan Community Development Model, physical constraints and natural hazards of the lands and community and stakeholder interests and was done so when the land use designations were developed for the proposed Project and Project alternatives. In addition, SEIR Section 2.6.3.7 analyzed wildland fire impacts and concluded that implementation of the proposed Project would result in significant and unavoidable direct and cumulative impacts related to wildland fires.

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D-1	We request RL20 land use designation for our home and property. The affected property owners who live on Japatul Lane and the Japatul Valley have repeatedly asked for the RL-20 designation, and have had the consistent support and recommendation to the County on this designation.	This commenter requests a RL-20 (Rural Lands 20 or one dwelling unit per 20 acres) designation for his property. The Draft SEIR proposed Project assigns a RL-20 designation to the commenter's property. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
D-2	We have lived on Japatul Lane for generations and are very much invested in the character and vitality of the land and our home. We would like to be able to continue to enjoy living in the Japatul Valley with, and for, our adult children, adult grandchildren, and future great grandchildren.	The commenter states that they have "lived on the Japatul Lane for generations" and want to continue to enjoy living in the Japatul Valley for generations. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.

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E-1	We have lived in the Japatul Valley for generations and request RL-20 designation for our property.	The comment requests a RL-20 (Rural Lands 20 or one dwelling unit per 20 acres) designation for their property. The Draft SEIR proposed Project assigns a RL-20 designation to the commenter's property. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
E-2	Our immediate neighbors to the West have one residence on 5 acres, the immediate neighbor to the North has one residence on 8 acres, and our neighbors to the East and North have larger parcels.	This comment identifies the relative parcel sizes of the neighboring properties. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
E-3	We affected property owners in the Japatul Valley area have requested RL-20 designation, and oppose the Planning and Development Services blanket RL-40 proposed designation. The Alpine Community Planning Group has consistently supported our RL-20 request throughout the many meetings over the last several years on the FCI lands General Plan Amendment. We respectfully request you grant us RL-20 designation for our property and home.	<p>The comment reiterates support for a RL-20 designation and opposition to a RL-40 designation (one dwelling unit per 40 acres), as assigned by the Alpine Alternative Land Use Map, Mid-density and Modified FCI Condition alternatives.</p> <p>The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine whether to approve the proposed Project or one of the alternatives analyzed in the Draft SEIR.</p>

F-1	In July 2012, The Alpine Community Planning Group voted decisively for the lands in the Japatul Valley requesting RL-20 to receive that classification in the new plan. They have never wavered in that position, despite taking several votes on the overall plan since that time. In fact, this is the only vote taken on the plan which received the unanimous vote of all present.	The commenter notes that the Alpine Community Planning Group consistently approved a Rural Lands 20 (RL-20) designation with a density of one dwelling unit per 20 acres. The Draft SEIR proposed Project assigns a RL-20 designation to the lands in the Japatul Valley. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
F-2	Dortheia Hinkle's 237 acre holding (APN 523-150-10 and 524-031-19) shown in the "Project Map", Figure 4-2.1A Mid Density Alternative for Alpine, and in Figure 4-3A of the Alpine Land Use Alternative Map, is one of these properties. It is located immediately adjacent to the Japatul Spur, and is in close proximity to sites developed at eight acre minimum and less. She had requested 20 acre minimum over her entire site.	The commenter requests a RL-20 designation to the referenced property (APNs 523-150-10, 524-031-19), which is consistent with the designation assigned by the proposed Project. The commenter provides her opinion that the proposed Project should be adopted and does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
F-3	In November of 2013, the SD County Planning Commission heard the Alpine Community Plan. They reviewed the Plan supported by the Alpine Community Planning Group, as well as the Staff Recommendation. In the case of Mrs. Hinkle's property, they recommended that the portion of her property, closest to the Japatul Spur (approximately 60 acres), be designated RL-20. Subsequently, in June 2014, the Board of Supervisors heard the various plan alternatives and was unable to make a decision at that time on this area. It was sent back to staff for more review.	<p>This comment correctly notes the action taken by the County Planning Commission in November 2013 when recommending land use designations and that the Board of Supervisors was unable to make a decision on the property during the June 2014 hearing when they considered revisions to the land use map for this project (FCI Lands GPA). The Draft SEIR considered three separate land use scenarios for the two parcels identified in Comment F-2, as identified below.</p> <ul style="list-style-type: none"> a. Proposed Project – RL-20 for both parcels, APNs: 523-150-10 and 524-031-19. b. Alpine Alternative Land Use Map alternative – RL-20 for APN 524-031-19 and RL-40 for APN 523-150-10. c. Mid-density and Modified FCI Condition alternatives – RL-40 for both parcels. <p>The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.</p>
F-4	Mrs. Hinkle is willing to accept the Planning Commission recommendation as shown in figure 4-3A as a compromise to	This comment notes that the designations assigned by the Alpine Alternative Land Use Map alternative (see Response to Comment

	<p>her original request. She recognizes that the terrain above the recommended 60 acres is rougher and less developable. She personally believes that there are several landmarks on the property that would be more protected if the upper area was to remain largely undeveloped. She hopes to be able to cluster her allowable lots on the lower portion of her land. That area is without steep slope, and is without significant preservable habitat.</p>	<p>F-3) for the commenter's property would be acceptable. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR.</p> <p>The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine whether to adopt the proposed Project or a Project alternative.</p>
F-5	<p>The Japatul Valley is an area that needs more development to remain viable. The Sunrise Powerlink devastated much of the Valley, and has left its definable mark. Areas such as Mrs. Hinkle's, with close proximity to a major circulation road and ample water, need to have the ability to expand the base of the Valley population and provide home sites that are of manageable size.</p>	<p>This comment notes that additional development is necessary in the Japatul Valley to counteract the impacts of the Sunrise Powerlink and further contends that increased development in this area is warranted because the area is located in "proximity to a major circulation road and ample water". Mitigation Measure LAN-1.1 requires coordination of land use planning and the Sunrise Powerlink. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.</p>
F-6	<p>We support the Planning Commission recommendation as shown in the "Alternative Alpine Plan".</p>	<p>This comment reiterates support for the Alpine Alternative Land Use Map alternative, as addressed in Response to Comment F-4. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.</p>

G-1	I represent Terry and David How in the matter of securing appropriate land use classifications for their property known as WINDFALL RANCH on Japatul Road. Ms Howe appeared before the Alpine Community Planning Group along with other land owners in mid 2012 to ask that their land be considered for 20 acre minimum. The Planning Group was extremely supportive, and in subsequent votes never wavered in nearly unanimous approval for that classification in that area.	The commenter notes that the property owner of Windfall Ranch is requesting a Rural Lands 20 (RL-20) designation with a density of one dwelling unit per 20 acres, which was also supported by the Alpine Community Planning Group in mid-2012. The Draft SEIR proposed Project assigns a RL-20 designation to the subject property. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR, but concerns the commenter's preference for the proposed Project. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
G-2	The Howe property, in particular, is deserving of this classification because it is located on both sides of Japatul Road, providing more than adequate circulation with several opportunities to improve such circulation for the area in general. . On its northernmost boundary, Larry Road, it is neighbored by the 8 acre and smaller subdivision of Japatul Estates, while its western boundary is bordered by more small lots. There are no "dead end road" issues, and there is a positive effect to be gained for the area as a whole by allowing the 20 acre minimum classification over the entire property.	This comment notes that a RL-20 designation is warranted because the property has adequate circulation and neighboring properties with even greater densities. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
G-3	In November of 2013, the Planning Commission recommended approval for 20 acre minimum over 120 acres of the Howe holding, In June of 2014, the Alpine FCI lands were heard before the Board of Supervisors, and they were unable to make a final decision on this issue,	This comment notes the action taken by the County Planning Commission in November 2013 when recommending land use designations and that the Board of Supervisors was unable to make a decision on the property during the June 2014 hearing when they considered revisions to the land use map for this project (FCI Lands GPA). The action taken by the Planning Commission is represented by the Alpine Alternative Land Use Map alternative. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. See Response to Comment A-4.
G-4	Although they still believe their land suitable for RL-20 overall, the Howes are will to accept the Planning Commission recommendation of 20 acre minimum on 120	This comment notes that the designations assigned by the Alpine Alternative Land Use Map alternative would be acceptable to the property owner.

	acres of their land - - with the understanding that they qualify to cluster that density in appropriate areas of their parcel most suitable for development. This recommendation is demonstrated in the "Alpine Land Use map Alternative": Figure 4-3A.	The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine the final land use designations for the Project. Also see Response to Comment A-5.
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H-1	I have been working with the property owners, Staff, and the Alpine Community Planning Group on the reclassification of this land holding for several years. The immediate neighbors to the north (which this property wraps around) are in full agreement with the changes in classification. The property touches a very dense mobile home park on its' western side, and is immediately adjacent to the site of the proposed Alpine High School. Its eastern boundary is tangent to the West Willows off ramp.	This comment provides the context for where the subject two parcels (APNs 404-231-03 and 404-240-18) are located. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
H-2	The classification of VR-2 is entirely appropriate for the residential sector of this property. The recommendation of staff for 2.4 acres of Rural Commercial is also completely reasonable given the site's proximity to freeway ingress and egress.	This comment provides support for the land use designation assigned by the Draft SEIR proposed Project and also by the Alpine Alternative Land Use Map, Mid-density and Modified FCI Condition alternatives. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
H-3	The Alpine Mid Density Map and the Alpine Land Use Map Alternative both reflect the wishes of not only the property owner, but multiple positive votes from the Alpine Community Planning Group and the vote of the SD County Planning Commission. The property is within the Water Service Availability Area, and the owner has been paying property taxes for years because that benefit is available to them, though not presently in use. Sewer access is a reasonable distance away.	The comment expresses support for the designations assigned by the Mid-density and Alpine Alternative Land Use Map alternatives. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
H-4	On behalf of the property owners, I support the findings of the SEIR on this property.	This comment reiterates the support for the Draft SEIR proposed Project discussed in Comments H-1 through H-3. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.

I-1	The above referenced APNs describe the property known as the Campbell Creek Ranch. It is located across Alpine Boulevard from property designated for Rural Commercial. It is immediately adjacent to densely developed mobile home property on its' western boundary, proposed Rural Commercial on its' eastern boundary, and proposed VR-2 on its' southern boundary.	This comment provides the context for where the subject four parcels (APNs 404-042-05; 404-050-55; 404-231-02 and 404-240-13) are located and that the parcels are adjacent to parcels to the south, which are designated a similar density of two dwelling units per acre or Village Residential 2 (VR-2). The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
I-2	It is within a few hundred feet of the property proposed for the new high school in Alpine. It is within the Water Service Area, and within a reasonable distance of prospective sewer service.	Further context is provided for the subject property with this comment and, as with Comment I-1, does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
I-3	The Alpine Community Planning Group and the San Diego County Planning Commission have approved this property for exactly this classification. The Board of Supervisors reviewed these uses for this and other properties and voiced no disapproval at their July 25, 2014 meeting.	The commenter correctly notes that both the Alpine Community Planning Group and the County Planning Commission recommended VR-2 for the subject property, which is consistent with how this property is designated by the Draft SEIR proposed Project and the Alpine Alternative Land Use Map, Mid-density and Modified FCI Condition alternatives. Likewise the Board of Supervisors endorsed the VR-2 designation for this property. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
I-4	I support the Alpine Mid Density Map and the Alpine Land Use Map Alternative which show the above designations for this property.	This comment expresses support for the Mid-density and Alpine Alternative Land Use Map alternatives, which assign the same designations for the subject property as the proposed Project. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine whether to approve the Proposed Project or an alternative to the Project.

J-1	CCR is immediately adjacent to an intensely developed mobile home park and a few hundred feet from the anticipated site of our new High School, 4040420100, 4042310500. CCR is within the "Village Core" of Alpine and within the Water Service Area of the Padre Dam Municipal Water District. When the High School is constructed, sewer will also be within a reasonable distance of our site.	This comment letter addresses the same property (Campbell Creek Ranch) as Comment Letter I, with APNs 404-042-05; 404-050-55; 404-231-02 and 404-240-13. The comment provides context for where this property is located, including adjacent properties, and that the property is within the service area for the Padre Dam Municipal Water District and the site for a proposed new high school for Alpine. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
J-2	We also support the proposed Rural Commercial designations for our northern neighbors across from us along Alpine Boulevard and the Augustyne-Kaderabek family near the West Willows off-ramp.	The commenter indicates further support for the Rural Commercial designation assigned to the adjacent property by the Draft SEIR proposed Project and also by the Alpine Alternative Land Use Map, Mid-density and Modified FCI Condition alternatives. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine the final land use designations for the Project.
J-3	CCR could be a perfect site for future multi-family residential growth. We have a deep love and appreciation for this property and want to see it evolve in a manner that is appropriate to Alpine community needs while maintaining much of its wild, natural beauty. We fully approve the recommended SEIR VR-2 reclassification which has been consistently supported by the Alpine Planning Group, the San Diego Planning Commission and your PDS department over the past several years providing for responsible development and growth while preserving open space consistent with the San Diego County GPA.	This comment also indicates support for a Village Residential 2 (VR-2) designation, or two dwelling units per acres, which was also supported by the Alpine CPG and County Planning Commission. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine the final land use designations for the Project.
J-4	We support the recommendation of PDS Staff as seen in both the Alpine Mid Density Map and the Alpine Land Use Map Alternative of the SEIR.	This comment expresses support for the Mid-density and Alpine Alternative Land Use Map Alternatives, which assign the same designations for the subject property as the Draft SEIR proposed Project. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be

RESPONSES TO COMMENTS

		included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine the final land use designations for the Project.
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RESPONSES TO COMMENTS

	Comment	Response to Comment
K-1	After reading the draft of the Supplementary Environmental Impact Report regarding the land use and zoning designations for the former FCI lands, my husband and I want to express our appreciation of the scope and depth of the report and the consistent and coherent vision and goals of the future regional growth of the county, based on the 10 guiding fundamental principles in the report. Over the past few years, we have attended many meetings of the Alpine Planning Group regarding land use designations for this area as well as the June 2014 meeting of the Board of Supervisors. We greatly appreciate the work of the BOS, Robert Citrano, and the current leadership of Travis Lyon of the APG in ensuring that the study for the General Plan Amendment based on land use designations has moved forward over recent months resulting in the SEIR draft.	This comment is an introduction to comments that follow. This comment letter addresses the same property as Comment Letter B. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision makers in evaluating the project.
K-2	As property owners of a 5-acre parcel on Alpine Blvd between Montecito Road and East Willows Road, we want to indicate our support for the SD County's "Proposed Project" in the SEIR and our rejection of both the "Mid-density Alternative" and the "Alpine Alternative Land Use Map." We believe that the "Proposed Plan" is the only plan that ensures a coherent and consistent plan for development of the area where our property is located. The County proposal for the land use designation here would increase population density by changing from the current SR-4 to SR-1. This would ensure that our property would be included in the expansion of water and sewer service areas required to serve the increased densities proposed.	The comment generally expresses a preference for the Draft SEIR proposed Project, which would assign a Semi-Rural 1 (one dwelling unit per acre) designation to their property, rather than the Mid-density and Alpine Alternative Land Use Map alternatives, which would retain the property's current density of one dwelling unit per four acres. See Responses B-2, K-4 and K-5. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine whether to approve the proposed Project or an alternative to the Project.
K-3	The "Alpine Alternative" would propose to maintain the current or existing General Plan zoning with densities of 1 dwelling unit per 4 acres, and to exclude our parcel and those around us from the benefits of development and the improvement of water quality standards as planned in the "Proposed Plan." As the report indicated, the alternative plan would be a "Violation of ground water quality standards by	This comment generally expresses opposition to retaining the current one dwelling unit per acre density because the property would not benefit from "the improvement of water quality standards as planned in the 'Proposed Plan'". The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR, but concerns the commenter's preference for the proposed Project. The comment will be included in the administrative record that will be

	designating land uses that would be ground water dependent in areas currently exposed to ground water contamination." The County's proposed plan ensures access to quality water for all, which is essential in a consistent and coherent plan for the future development of this area.	considered by the decision-makers in evaluating the Project.
K-4	A second observation and grave concern of ours is that, over the years, the current zoning here has resulted in a very unsafe environment. Due to inadequate roadway widths, many dead-end roads, many one-way roads, and gated communities, there is no emergency access in this area. There are junkyards, trash and other fire hazards up behind Montecito Road which epitomize the lack of safety here with no emergency access. In the absence of the benefits of the County's "Proposed Plan," we would continue to be unsafe when faced with a true emergency. Without the well planned roads and emergency access throughout San Marcos and Carlsbad, the 2014 & 2015 fires would have caused much greater damage and would have been much more challenging to contain. Ensuring the safety of all Alpine residents through well planned roads and emergency access is critical to us all.	<p>This comment generally implies that the current density of one dwelling unit per four acres has resulted in "a very unsafe environment," such as: inadequate roadway widths, dead-end roads, one-way roads, gated communities, fire hazards and a lack of emergency access. Future development will be subject to the policies and mitigation measures identified in the Draft SEIR that will address many of these conditions, whether constructed at a density of one dwelling unit per four acres or higher. SEIR Section 2.13 Transportation and Traffic identifies the mitigation measures that future development would be required to implement, they include but are not limited to:</p> <ul style="list-style-type: none"> • SEIR Section 2.13.4.1 includes Mitigation Tra-1.3 which requires new development implement County Road Standards. • SEIR Section 2.13.4.3 includes Policy M-4.4 which will ensure new and improved roads are constructed with adequate widths and can accommodate emergency vehicles. • SEIR Section 2.13.4.3 includes Policy M-3.3, which requires development provide multiple ingress/egress routes. • Gated communities — This comment does not raise an issue related to an environmental issue pursuant to CEQA; therefore, no further response is required. <p>SEIR Section 2.6.3.3 concludes that impacts associated with emergency access as a result of the proposed Project would be reduced to below a level of significance with implementation of the applicable mitigation measures. SEIR Section 4.3.2.13 concludes that the other alternatives with less intensive development, such as the Mid-density alternative, would result in less vehicle trips generated on local roadways, which would translate to fewer conflicts with emergency access; however, impacts would still be considered potentially significant and the applicable policies and mitigation measures identified in this SEIR would be required.</p>

		<p>Wildland fire impacts are addressed in SEIR Section 2.6.3.7 and the SEIR determines that while potentially significant impacts resulting from implementation of the proposed Project would be reduced by the regulations, policies and mitigation measures identified in the SEIR, the impacts would not be reduced to below a level of significance. As such, implementation of the proposed Project would result in significant and unavoidable direct and cumulative impacts related to wildland fires. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine whether to approve the proposed Project or an alternative to the Project.</p>
K-5	<p>After a thorough review of the SEIR Report, we want to express that we whole heartedly disagree with and reject the new alternative referred to in the draft as the "Mid-density alternative," where a few of our more vocal neighbors in the Montecito Road area propose "reduced densities on specific parcels to further reduce Project impacts associated with biological resources, fire hazards, increased urban unauthorized access, improvement to infrastructure, etc." Under the County's Proposed Plan, our neighbors' properties would be part of the larger plan, yet the owners would not have to subdivide and increase density on their land if they choose not to. The "Mid-density alternative, however, would exclude our properties from the benefit of the future development of all of Alpine and have a negative impact on the value of the land here. We believe that those who support the "Mid-density Plan" or the "Alpine Alternative Land Use Map" are not guided by the 10 sound principles and goals of the proposed future development of Alpine Blvd east of Viejas and south of interstate 8. This land must be included in the consistent and coherent vision for the future regional growth of San Diego County.</p>	<p>The County appreciates the comments' concern to resolve issues such as fire hazards and a lack of infrastructure, and the opposition to Draft SEIR alternatives that retain a density of one dwelling unit per four acres on the subject property. Land use designations in and of themselves do not create unsafe conditions. The impacts identified in this comment predate the 2011 General Plan Update. This comment conveys the commenters' disagreement with the Mid-density alternative, which assigns a density of one dwelling per four acres to their property, whereas the proposed Project assigns a density of one dwelling unit per acre. A comparison of the Mid-density alternative to the proposed Project for biological impacts can be found in SEIR Section 4.3.2.4. This section concludes that, as with the proposed Project, impacts to special status plant and wildlife species, riparian habitat and wildlife corridors associated with buildout of the Mid-density alternative would remain significant and unavoidable after implementation of the applicable policies and mitigation measures. SEIR subsection 4.3.2.6 compares the wildland fire impacts of the Mid-density alternative with the proposed Project. The SEIR concludes that, as with the proposed Project, impacts from wildland fires would not be reduced to below a level of significance; thus, the impact would remain significant and unavoidable. The comment provides the commenter's opinion and will be included in the administrative record that will be considered by the decision-</p>

RESPONSES TO COMMENTS

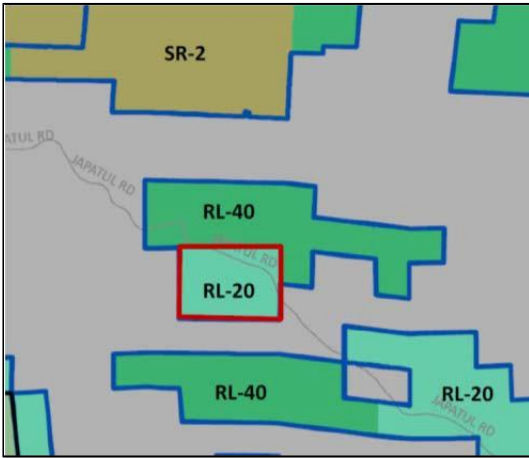
		makers in evaluating the Project. Ultimately, the Board of Supervisors will determine the final land use designations for the Project.
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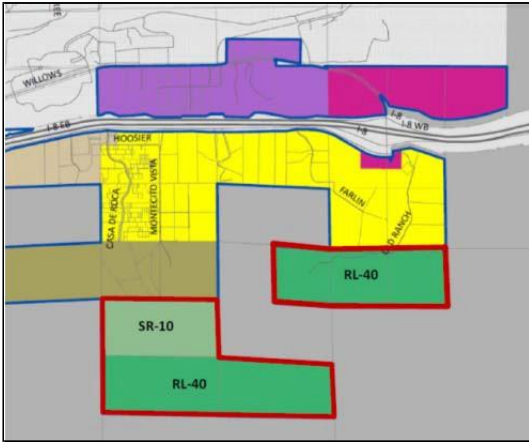
	Comment	Response to Comment
L-1	The Endangered Habitats League (EHL) appreciates the opportunity to comment on the Draft Supplemental Environmental Impact Report (SEIR) that was prepared for the County's proposed General Plan Amendment on about 72,000 acres of backcountry land previously zoned under the Forest Conservation Initiative (FCI). For your reference, EHL is Southern California's only regional conservation group. For over a dozen years, EHL worked collaboratively with the County and other stakeholders to develop a truly sustainable General Plan that accommodates growth while reducing public infrastructure costs and increasing conservation of San Diego's world-class biodiversity and scenic landscapes.	This comment is an introduction to comments that follow. No further response is required.
L-2	EHL submits that the proposed Project would create numerous significant adverse impacts that could be substantially lessened or avoided by adoption of the environmentally superior, Modified FCI Condition Alternative ("Modified Project").	This comment states that the Modified FCI Condition alternative would result in "substantially lessened or avoided" impacts than the Draft SEIR proposed Project. This statement is consistent with the content and results of the analysis of the Draft SEIR and does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine whether to approve the Proposed Project or an alternative to the Project.
L-3	As is explained in detail below, the California Environmental Quality Act (CEQA) contains a substantive mandate precluding adoption of a Project where feasible alternatives that achieve most project purposes and which avoid or substantially lessen significant environmental impacts exist. Because the environmentally superior Modified Project meets these tests, the County has no substantial evidence that no such alternative exists. It therefore cannot make the necessary findings that are a predicate to approve a Project with significant impacts via a finding of overriding considerations.	The comment correctly identifies the Modified FCI Condition alternative as the Environmentally Superior alternative, as disclosed in the Draft SEIR. As noted by the commenter, CEQA Guidelines Section 15126.6(c) provides that the bases for rejecting alternatives include: "(i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts." The SEIR discloses that the significant and unavoidable impacts associated with the proposed Project remain significant and unavoidable for the Modified FCI Condition alternative and all of the other Project alternatives, except the No Project alternative, as no additional feasible mitigation or avoidance measures have been identified to reduce impacts associated with the alternatives to achieve a less than significant impact determination.

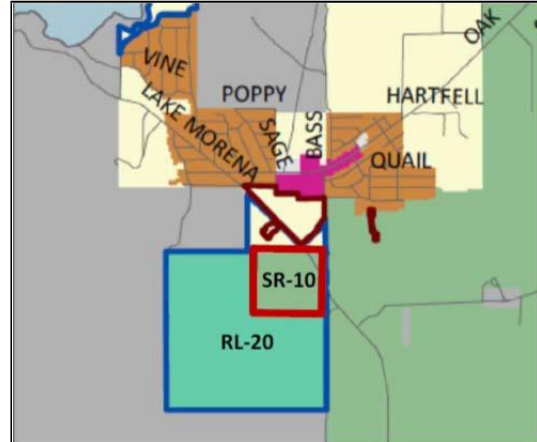
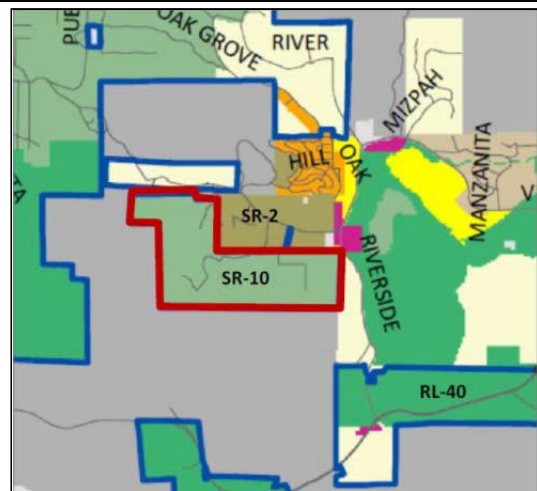
		In making the findings required by CEQA Guidelines Section 15091, the Board of Supervisors will consider this and all other information included in the SEIR and the administrative record for the project. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine whether to approve the Proposed Project or an alternative to the Project.
L-4	Indeed, the SEIR acknowledges that the Modified Project's reduced development intensity results in less modification of the landscape, "thus decreasing environmental impacts in <i>all</i> issue areas evaluated."(SEIR at p. S-7, emphasis added.) Moreover, because this alternative fully meets all Project objectives and in most cases better than the proposed Project and no substantial evidence exists to support a contrary conclusion-CEQA requires its adoption in lieu of the proposed Project.	The County agrees that the Modified FCI Condition alternative reduces the severity of potential impacts when compared to the Draft SEIR proposed Project. However, the significant and unavoidable impacts of the project are not avoided with this alternative. See Global Response 1 (GR-1). In addition to this factor, the Board of Supervisors will also consider whether the alternative meets the basic objectives of the project and will make the findings required by CEQA Guidelines Section 15091. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
L-5	In the discussion below, we briefly summarize the stated Project objectives, the Project and environmentally superior Modified Project, the comparative impacts, and finally an evaluation of the uncontroverted evidence showing the Modified Project's superior ability to meet the Project objectives as compared with the Proposed Project.	This comment is an introduction to comments that follow. See Global Response 1 (GR-1). No further response is required.
L-6	The Project objectives are the same as those of the County of San Diego General Plan: <ul style="list-style-type: none"> • Support a reasonable share of projected regional population growth; • 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 	The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. .

<p>recreational opportunities;</p> <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; • 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 • Recognize community and stakeholder interests while striving for consensus. <p>In addition, the following two Project-specific objectives are added:</p> <ul style="list-style-type: none"> • Assign land use designations in a manner consistent with the Guiding Principles, Goals, and Policies of the adopted County General Plan. • Assign land use designations that minimize conflicts with the U.S. Forest Cleveland National Forest Management Plan. <p>As is explained in detail below, every single one of these objectives is better or equally met by the Modified Project alternative.</p>	
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L-7	Nearly 2,000 additional dwelling units over the development quantity assumed in the 2011 General Plan Update would be added by the Project. (Table 1-1A.) Virtually all of these units would be spread out over the landscape in remote locations including in the Alpine, Central Mountain, Jamul/Dulzura, North Mountain, and Mountain Empire subregions. All of the affected 71,715 acres are located east of the County Water Authority line, and distant from infrastructure, services, public safety resources, and jobs. Indeed, FCI lands represent some of the most rugged, inaccessible areas in the County.	The County appreciates the comment. The information in this comment is not at variance with the existing content in the Draft SEIR.
L-8	According to the SEIR, the Project would produce numerous significant unavoidable impacts. These include on Visual Character or Quality, Light or Glare, Direct Conversion of Agricultural Resources, Indirect Conversion of Agricultural Resources, Direct and Indirect Loss or Conversion of Forestry Resources, Air Quality Violations, Non-Attainment Criteria Pollutants, Sensitive Receptors, Special Status Species, Riparian Habitat and Other Sensitive Natural Communities, Wildlife Movement Corridors and Nursery Sites, Wildland Fires, Water Quality Standards and Requirements, Groundwater Supplies and Recharge, Mineral Resources Recovery Sites, Permanent Increase in Ambient Noise Level, Schools, Traffic and LOS Standards, Rural Road Safety, Adequate Water Supplies, Sufficient Landfill Capacity, Compliance with AB 32, and Effects of Global Climate Change on the Proposed Project. Only if no feasible alternatives meeting most Project objectives exist may the Project be approved consistent with CEQA.	The comment correctly lists the resources that are found to have significant and unavoidable impacts. The County does not agree with the commenter's interpretation of CEQA's findings requirements. These requirements do not remove the discretionary authority of the County Board of Supervisors in evaluating and deciding upon project alternatives. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine whether to approve the Proposed Project or an alternative to the Project.
L-9	Notable among the proposed changes is an expansion of the village in Alpine with urban densities around the Viejas reservation. This change is profound because it will involve the expansion of urban infrastructure further into the backcountry. The draft amended Community Plan for Alpine states: "Expansion of imported water and sanitary sewer services are	The comment is correct in identifying urban densities are proposed to the east of the Viejas casino, outlet mall and hotel. These densities will require an expansion of water and sewer infrastructure. The County does not agree with the characterization of the Community of Alpine as being "in the backcountry" of unincorporated San Diego County. Much of this community is within the County Water Authority boundary and

	necessary to accommodate the increased land use intensities identified on the Alpine General Plan land use map. More specifically, both imported water and sewer services are necessary to fully realize the land use intensities allowed by the Village land use designated areas along Willows Road east of Viejas and residential densities south of Alpine Boulevard between the Interstate 8 interchanges at West Willows Road and at the eastern end of Willows Road.” (DEIR at p. 1-23.)	is bisected by Interstate 8. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine whether to approve the Proposed Project or an alternative to the Project.
L-10	In addition, much the rugged former FCI lands would go from lower to higher density Rural and various Semi-Rural densities. There are some locations where the Semi-Rural designations make sense due to existing parcelization. In other areas, however, intact parcels of 40 and 80 acres and larger are being designated at higher Rural and even Semi-Rural densities (for example in Alpine). In comments on the NOP for the Project, EHL articulated several examples of such density increases:	The comment is not referencing the correct baseline for its comparative analysis. See Global Response 2 (GR-2). The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
L-11	Alpine: The area of 1:10 south of Abrams Ridge should change to 1:20.	<p>The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine the final land use designations for the Project. It appears that this comment is referring to 17 parcels (outlined in red on Figure L-11, which is an excerpt from Draft SEIR Figure 1-2A) located along Japatul Road south of the Rancho Palos Verde area in the</p>  <p style="text-align: center;">Figure L-11</p>

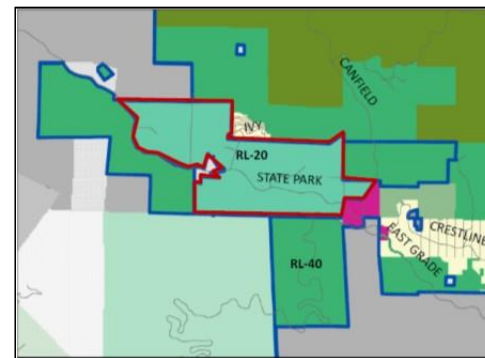
		Alpine Community Planning Area (CPA). These properties are designated Rural Lands 20 (RL-20) under the proposed Project. This is consistent with the recommendations of the commenter.
L-12	South of the Commercial district and south of Old Ranch are three large blocks of unparcelized land that should be 1:40 or 1:80 rather than 1:10.	<p>The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine the final land use designations for the Project. This comment appears to be referring to six 40- or 80-acre parcels designated Rural Lands 40 (RL-40 or one dwelling unit per 40 acres), under the proposed Project, consistent with the commenter's recommendation, and one parcel designated SR-10 (one dwelling unit per 10 acres). The area in question is shown outlined in red on Figure L-12, which is an excerpt from Draft SEIR Figure 1-2B.</p>  <p style="text-align: center;">Figure L-12</p>
L-13	In the area of Fusco, Burdoaks, Old Ranch and Granite Vista there should be a 1:20 density rather than 1:10. Note: This last area may be in Descanso. Note: There are two "Old Ranch" roads in different parts of the map.	This comment is referencing an area in the vicinity of the Old Ranch Road that is located in Descanso. The commenter's recommendations for this area are addressed in Response to Comment L-16.
L-14	Lake Moreno/Campo: The "square" immediately south of the town center, labeled SR-10, should be RL-20.	This comment, which recommends a RL-20 (one dwelling unit per 20 acres) designation, appears to be referring to the two parcels outlined in red on Figure L-14, which is an excerpt from Draft SEIR Figure 1-9. No specific rationale is provided for the commenter's recommended designation. The proposed Project and all Project alternatives assign a SR-10 (one dwelling unit per 10 acres) land use designation. One parcel is 23 acres and could subdivide into two lots. The other parcel is four acres and does not have the ability to subdivide at that density.

		<p>The parcels are located on Lake Morena Road just south of the Lake Morena Village adjacent to an area with a Semi-rural 4 (one dwelling unit per four acres) designation.</p> <p>The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine the final land use designations for the Project.</p>	 <p>Figure L-14</p>
L-15	<p>Descanso: The area around Verna Road should be 1:20 rather than 1:10.</p>	<p>The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine the final land use designations for the Project. This comment appears to be referring to 16 parcels ranging in size from five to 25 acres and recommends a Rural Lands 20 designation without providing</p>	 <p>Figure L-15</p>

		<p>any specific rationale. These parcels are shown outlined in red on Figure L-15, which is an excerpt from Draft SEIR Figure 1-5. These parcels are assigned a Semi-Rural 10 (SR-10) designation by the proposed Project and all Project alternatives, consistent with the parcel sizes of the surrounding area. This designation is also consistent with the Descanso Community Sponsor Group and Planning Commission recommendations.</p> <p>The SR-10 designation is slope-dependent; therefore, areas with slope greater than 25% have a lower density of one dwelling unit per 20 acres. Due to the amount of area with slopes greater than 25%, the subject parcels would not be able to further subdivide under the SR-10 designation. Therefore, the impacts would be the same under both the SR-10 and RL-20 designations.</p>
L-16	<p>The area around Old Ranch, South Forty, Campbell Ranch, and Granite Vista should be 1:20 rather than 1:10.</p>	<p>The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine the final land use designations for the Project. This comment is referring to 37 parcels ranging in size from approximately one to 49 acres located in the southeastern portion of the Descanso Planning Area adjacent to the Interstate 8 on-ramp at Japatul Valley Road and recommends a RL-20 designation, but does not provide any specific rationale. These parcels are designated SR-10 under the proposed Project and all Project alternatives, as shown outlined in red on Figure L-16, which is an excerpt from Draft SEIR Figure 1-5, consistent with the parcel sizes of the surrounding area. This designation is also consistent with the recommendations of</p>



Figure L-16

		the Descanso Community Sponsor Group and County Planning Commission. Under the SR-10 designation, only three of these parcels would have further subdivision potential and under the Rural Lands 20 (RL-20) designation, only the 49-acre parcel would be able to subdivide. Based on County staff's analysis as reflected in the SEIR, the RL-20 designation would not substantially reduce potential impacts beyond the SR-10 designation.
L-17	South of the Commercial district and south of Old Ranch are three large blocks of unparcelized land that should be 1:40 or 1:80. (Note: This last area may be in Alpine.)	This comment appears to be addressing the Old Ranch Road, located in Alpine. The commenter's recommendations for this area are addressed in Response to Comment L-12.
L-18	North Mountain: On the inset map, lands northeast of the village should be RL- 20 or RL-40 rather than SR-10.	<p>The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine the final land use designations for the Project.</p>  <p>Figure L-18</p> <p>This comment appears to be referring to the area outlined in red on Figure L-18, which is an excerpt from Draft SEIR Figure 1-11. The area is designated RL-20 (one dwelling unit per 20 acres) under the proposed Project, which is consistent with the designation recommended by the commenter.</p>
L-19	Notably, neither the SEIR nor Origins of the Forest Conservation Initiative Lands GPA Project Alternatives articulates <i>any</i> planning rationale or rationale based on the Guiding Principles for these shifts to Semi-Rural in the backcountry.	<p>This comment states there is no planning rationale or General Plan Guiding Principles derived rationale to support a change to semi-rural designations for those Project areas discussed in Comments L-11 through L-18. The County does not agree that these Project areas are “changing” to a semi-rural density as discussed in the rationale below.</p> <ol style="list-style-type: none"> 1. Semi-rural densities are not being proposed within the Project areas referenced in Comments L-11 and L-18; 2. The comment is not referencing the correct baseline for its

		<p>comparative analysis. See Global Response 2 (GR-2). Existing land use designations are shown on the No Project alternative land use maps as shown on Draft SEIR Figures 4-4.1B (Comment L-12), 4-4.8 (Comment L-14) and 4-4.4 (Comments L-15 and L-16). The existing densities shown on these maps are higher semi-rural densities being proposed by these comments.</p> <p>The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.</p>
L-20	<p>Nor is there any response in the SEIR to the compelling planning rationales EHL articulated in its comments on the NOP for maintaining low rural densities in these remote, rugged areas. For this reason, EHL repeats it here: "Forest inholdings are generally remote locations, removed from urban services and urban infrastructure, with high ecological integrity and high fire risk, Therefore, intensities of use (as reflected in assigned densities) should be at the <i>lowest</i> levels the Land Use Element allows, consistent with underlying parcelization. In other words, the number of potential new parcels should rarely increase above the baseline number of parcels, and then only in locations already substantially committed to such parcelization, so as to avoid "spot zoning." Mere adjacency to areas of existing higher density, or proximity to a roadway, is <i>not</i> sufficient rationale for up-planning. The needs to reduce fire hazard, preserve the environmental, and reduce service costs remain paramount. The current General Plan's limits of estate, semi-rural, and village development should be respected. Absent a demonstrable objective need to increase the housing capacity of the General Plan, there should be <i>no</i> expansion of Village or Semi-Rural densities into the former FCI lands. A density of 1:40 or less dense should be the default <i>unless unique circumstances compel otherwise.</i>" (EHL NOP Comments, Appendix B.)</p>	<p>This comment infers that lands within the Project area are "generally remote locations, removed from urban services and urban infrastructure" and should be assigned the lowest densities. Chapter 1, Project Description, Section 1.5.2.1.a of the Draft SEIR provides a general description of land use map changes based on the proposed Project. This section describes how remote areas have been designated the lowest densities (RL-40 or RL-80). Rationale is generally provided for circumstances where an RL-40 or RL-80 designation is not assigned, as discussed below.</p> <ul style="list-style-type: none"> Alpine – An extension of the Alpine Village densities, along with the provisions of urban services, is proposed along Interstate 8 to meet the community objective for a population base that can more fully support a wider range of services within CPA boundaries. Jamul and Julian – Areas are designated as Semi-rural 10 (SR-10) based on existing parcel sizes. Lake Morena – Areas are designated as Semi-rural 4 (SR-4), SR-10 or RL-20 based on existing parcel sizes and proximity to the existing Rural Village. Ramona – Areas are designated as Village Residential 2 (VR-2) or SR-10 based on existing parcel sizes. <p>The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.</p>
L-21	<p>The flaws in the Project are most clearly seen in Alpine 5, 6, 7, and 8. Indeed, Alpine can be fairly described as a planning</p>	<p>This comment is an introduction to comments that follow. No further response is required.</p>

	disaster.	
L-22	Semi-Rural densities of SR-1, SR-2, SR-4, and SR-10 are shown over large portions of 696 acres. These lands are constrained by prime agriculture, National Forest adjacency, high fire risk, lack of water and access, high biological value, and adjacency to National Forest. Existing parcelization does not justify Semi-Rural categories, and similarly unparcelized lands just to the east (and indeed, throughout the County) are designated Rural, creating inequities.	<p>The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR, but concerns the commenter's opinion regarding the designations. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.</p> <p>The comment is correct that the majority of the Project area known as AL-5 is assigned semi-rural land use designations (527 of the 695 acres are assigned semi-rural designations). The comment lists many site constraints found throughout the Project areas. Per Draft SEIR Figure 2.2.1B, there are no prime agriculture lands in this area. Existing parcelization is one consideration among many used to determine the appropriate land use designations for Project areas, but is not the sole justification. For instance the area is directly east of the County Water Authority boundary and adjacent to Village-designated parcels.</p>
L-23	Numerous General Plan Guiding Principles and Land Use Policies are violated.	The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
L-24	Land designated in the Project as Semi-Rural actually contains existing lots of 40 to 80 acres in size. <i>The proper designation is RL-20 or RL- 40.</i> Subdivision of intact, relatively remote land into dispersed estate lots would place more residences at fire risk, fragment habitat, increase service costs, and increase GHG emissions for the resulting long-distance commuters.	<p>The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine the final land use designations for the Project.</p> <p>The County agrees that in this area semi-rural land use densities are assigned on large parcels (40 to 80 acres). Future development would need to minimize risks from wildfire in accordance with the County Building and Consolidated Fire Codes (see mitigation measure Haz-4.3, identified in SEIR subsection 2.6.4.7) and minimize impacts to sensitive biological resources in accordance with the County Resource Protection and Biological Mitigation Ordinances (see mitigation measure Bio-1.6, identified in SEIR subsection 2.4.4.1) and to accommodate expansion of services into this area. Consistent with the determinations of the SEIR, the proposed Project would result in significant and unavoidable impacts from wildland fires and</p>

		greenhouse gas emissions (Climate Change). However, the fragmentation of habitats was determined to be less than significant after mitigation. There are no significance criteria for 'service costs' due to the cost of services not being related to physical impacts on the environment.
L-25	<i>b) Consistency with existing parcel size – Outside of villages and the County Water Authority boundary, Semi-Rural 10 or Rural Lands 20 land use designations are assigned only when the predominant parcel size is similar (10 to 20 acres) and would result in little to no additional subdivision potential. To the contrary, the proposed SR-1, SR-2, SR-4, and SR-10 are not similar in size to the predominant parcels in these outside-Village and outside-CWA locations.</i>	The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine the final land use designations for the Project. Please see Global Response 4 (GR-4). The County does not agree with the commenter's opinion that the proposed Project and Project alternatives are inconsistent with the planning criteria for the proposed land use designations relative to existing parcel size.
L-26	<i>c) Reduced development adjacent to CNF lands – Lower land use designations are assigned adjacent to the CNF lands to reduce density in the Wildland/Urban Interface. Additional development in this area increases the likelihood of human caused wildland fires, requires a greater commitment of resources to manage buffers between the CNF and developed areas, and increases the need for additional infrastructure and services in CNF lands. The proposed SR-1, SR-2, SR-4, and SR-10 place Semi-Rural adjacent to the CNF across a broad interface, where fire history shows repeated conflagrations.</i>	The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine the final land use designations for the Project. Please see Global Response 4 (GR-4). The County does not agree with the comment that lower densities are not assigned adjacent to the CNF lands. The densities in this area range from VR-2 (two dwelling units per acre) adjacent to Alpine Boulevard to SR-2, 4 and 10 (one dwelling unit per two, four or ten acres) adjacent to the CNF. These lower densities would allow for buffers between the CNF and dwelling units to minimize fire risk.
L-27	<i>d) Reduced development in areas with sensitive biological resources – Lower density residential designations are assigned in areas with high value biological resources to avoid these sensitive resources. Significant portions of the proposed SR-2, SR-4, and SR-10 and even some SR-1 have "high" biological value.</i>	The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine the final land use designations for the Project. Please see Global Response 4 (GR-4). The County does not agree with the comment that the land use densities assigned would not allow the sensitive resources to be avoided. Much of the areas with high value biological resources have a proposed density of one dwelling unit per

		ten acres, where conservation subdivisions would be required for future development. In other areas, smaller minimum lot sizes would allow sensitive resources to be avoided.
L-28	<i>e) Reduced development in areas without adequate access – Lower densities are assigned in areas that are one-half mile or more from public roads.</i> Except for a portion of SR-1, virtually all the SR-2, SR-4, and SR-10 in the Project is more than one-half mile from public roads.	The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine the final land use designations for the Project. Please see Global Response 4 (GR-4). The County agrees with the comment that portions of this area lack adequate emergency access; however, County development regulations require access improvements prior to approving development applications.
L-29	<i>f) Reduced development in areas with physical constraints – Lower densities are assigned in areas dominated with slopes greater than 25%.</i> Portions of the proposed SR-1 and proposed SR-2 are slope constrained.	The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine the final land use designations for the Project. Please see Global Response 4 (GR-4). Each of the semi-rural designations is slope dependent where the allowable density is reduced in areas where slopes are greater than 25%. In addition, other factors are relevant when considering the land use designation, such as the AL-5's proximity to Interstate 8 and the Alpine Village. All the Project alternatives assign semi-rural designations in this area, primarily due to proximity to Interstate 8 and the Alpine Village and Alpine CPG and Planning Commission recommendations. In comparison to the proposed Project, land use densities are reduced in the Alpine Alternative Land Use Map (SEIR Figure 4-3B), Mid-density (SEIR Figure 4-2.1B) and Modified FCI Condition alternatives (SEIR Figure 4-1.1B).
L-30	Lands designated SR-1 and SR-2 over portions of 427 acres are constrained by very high fire risk, biology, wetlands, slope, and adjacency to public lands. Rural densities here are appropriate unless already parcelized. However, the Project errs in designating unparcelized land for estate subdivision when it should be RL-20 or RL-40. Planning Criteria b, c, d, e, and f are	Please see Global Response 4 (GR-4). The County does not agree that semi-rural densities are inappropriate in this area due to the areas biology, wetlands and slope, and does not agree that some owners are getting special treatment. The area referenced by this comment is adjacent to Alpine Boulevard and Interstate 8. Lower densities are proposed in areas that are a greater distance from these

	<p>all violated to various extents, such as in placing Semi-Rural adjacent to the Cleveland National Forest and in placing even SR-1 more than a half mile from a public road. Such special treatment for these property owners would create inequities. Subdivision of intact land into estate lots would place more residences at fire risk, fragment habitat, increase service costs, and increase GHG emissions for the resulting long-distance commuters.</p>	<p>transportation corridors. The higher densities are proposed due to the proximity to the Interstate.</p> <p>SEIR Figure 2.4-1B shows that the area referenced by the comment is generally composed of scrub and chaparral; however, it also includes areas with riparian and bottomland habitat and disturbed or developed areas. SEIR subsection 4.2.2.4 determined that, as with the proposed Project, the Modified FCI Condition alternative would also result in significant and unavoidable impacts to Special Status Plant and Wildlife Species, Riparian Habitat and Other Sensitive Natural Communities and Wildlife Movement Corridors and Nursery Sites.</p> <p>SEIR Figure 2.2.4-3B of the SEIR shows areas with wetlands constraints. SEIR subsection 2.6.4.3 identifies mitigation that would reduce the proposed Project impacts to federally protected wetlands to below a level of significance.</p> <p>The comment is correct that portions of this area lack adequate access and are adjacent to CNF lands; however, County development regulations, such as the County Consolidated Fire Code and the County Public and Private Road Standards, require access improvements and adequate buffers from the CNF lands prior to approving development applications. Secondary access requirements in the Consolidated Fire Code would need to be met for any discretionary projects to subdivide. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine the final land use designations for the Project.</p>
L-31	<p>While part of AL-7 is properly designated as Rural, SR-10 improperly appears over portions of 360 acres. Consistent with the Planning Criteria, and due to numerous constraints including high fire risk, slope, biology, wetlands, water, and limited access, these properties should be RL-40.</p>	<p>Please see Global Response 4 (GR-4). The County does not agree that a SR-10 designation (one dwelling unit per ten acres) is inappropriate in this area due to constraints. This designation requires a conservation subdivision, which would require future development to avoid sensitive resources by clustering development to the least sensitive portions of the development area. See also Response to Comment L-30.</p>

L-32	<p>The RL-20 in the Project is improperly placed over large expanses of unparcelized and highly remote land with high fire risk, National Forest adjacency, biological value, agriculture value, and slope, water, and access constraints. These unparcelized properties should given densities at the bottom of the range, namely, RL-40 or RL-80. Dead-end road lengths for fire safety are also exceeded. Planning Criteria b, c, d, e, and f are all violated.</p>	<p>Please see Global Response 4 (GR-4). The commenter asserts that RL-20 is “improperly placed” in the area of Alpine referred to as AL-8 (see Response to Comment L-62, Figure L-62A) and this area should be designated either RL-40 or RL-80. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine the final land use designations for the Project.</p>
L-33	<p>No “unique circumstances” grounded in the Guiding Principles have been articulated in the Project or the accompanying SEIR to justify Alpine’s gross departures. The high degree of inconsistency with the Planning Criteria – which in turn simply embody General Plan Guiding Principles, Goals, and Policies – is truly astounding.</p>	<p>The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine the final land use designations for the Project. Please see Global Response 4 (GR-4) and Response to Comment L-32. The comment asserts that “unique circumstances” are necessary to deviate from the RL-40 or RL-80 designations that Comment L-33 asserts are more appropriate.</p>
L-34	<p>The density increases in the Project and indeed all the alternatives (much less so for the Modified Project) are contrary to the 2011 General Plan’s goal of reducing development in more remote, GHG-intensive locations. A major expansion of the Alpine Village is highly adverse for GHG emissions, as this new development will create long distance commutes to jobs and activity centers absent any sort of transit capacity.</p>	<p>The comment is not referencing the correct baseline for its comparative analysis. See Global Response 2 (GR-2). Existing land use designations are shown on the No Project alternative land use maps as shown on Draft SEIR Figures 4-4.1A through 4-4.13.</p> <p>In addition, the comment seeks to paraphrase Goals of the General Plan in stating that the proposed Project land use map is “contrary to the 2011 General Plan’s goal of reducing development in more remote, GHG-intensive locations”. There are numerous land use goals in the General Plan that speak to the appropriate location of the various land use designations. The phrase “GHG-intensive location” is not within the General Plan.</p> <p>As shown in the Draft SEIR Project Description, Table 1-1B (page 1-12), Rural Lands densities are assigned to 60,500 acres of the Project’s 71,700 acres, or 84% of the Project area.</p> <p>Contrary to the assertion that village expansion generates GHG emissions, fully functional villages can reduce emissions by providing for mixed-use, walkable urban settings that do not require auto-trips to</p>

		access common commercial and civil amenities. The comment contends that village expansion will require long distance commutes to jobs and activities centers; however, no information is presented in support.
L-35	Besides this inconsistency with the General Plan, the Project is inconsistent with the SANDAG RTP/SCS. This is because the latter relies on the “smart growth” land use designations of the 2011 General Plan for all of its assumptions and outcomes and does not contemplate additional rural residential density or major Village expansion <i>a la</i> Alpine. The County should not undermine the RTP/SCS through the FCI and, in the SEIR, all such impacts on regional planning should be properly analyzed. In doing so, the DEIR should follow recent court guidance regarding use of a “business as usual” comparison approach (<i>Ctr. for Biological Diversity v. Dept. Fish & Wildlife</i> , 62 Cal. 4 th 204 (2015)) as well as evaluate consistency with gubernatorial Executive Orders on climate change.	<p>The County does not agree with the comment that the proposed Project is inconsistent with the SANDAG Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS); see page 26 at: http://www.sdforward.com/pdfs/RP_final/The%20Plan%20-%20combined.pdf.</p> <p>The following strategy in the SANDAG RTP/SCS would be applicable to the unincorporated county:</p> <p style="padding-left: 40px;"><i>A land use pattern that accommodates our region’s future employment and housing needs, and protects sensitive habitats, cultural resources, and resource areas.</i></p> <p>The proposed Project is consistent with this strategy because the proposed Project would protect sensitive habitats, cultural resources and resource areas by assigning Rural Lands densities over 84% of the Project area. Density increases are primarily proposed along the Interstate 8 corridor as an extension of the Alpine Village where impacts to sensitive habitat, cultural resources and farmland would be minimal.</p> <p>Further, the County does not agree that the proposed Project would undermine the RTP/SCS strategy because of the proposed linear expansion of the Alpine Village. The current Alpine Village is part of the RTP/SCS as it is identified as an existing/planned Rural Village on the SANDAG Smart Growth Concept Map (refer to Smart Growth in the San Diego Region brochure at: http://www.sandag.org/uploads/projectid/projectid_296_13993.pdf)</p> <p>As discussed in this brochure the San Diego Forward: The Regional Plan calls for better coordination between land use and transportation. The “Smart Growth Concept Map” identifies locations in the region that can support smart growth, transit, walking, and biking.</p> <p>Further, the comment is not specific regarding which “impacts on regional planning” are being referred to. Within each resource chapter, where applicable, applicable regional planning documents are</p>

		discussed, including their purpose and relation to the FCI Lands GPA. Within the Global Climate Change Section 2.15, Executive Orders S-3-05 and B-30-15 are both addressed; refer to subsection 2.15.2.2 and 2.15.3.1. See also Global Response 3 (GR-3)
L-36	The County's Climate Action Plan (CAP) was invalidated due to the absence of enforceable mechanisms to reduce GHG emissions. Yet, the CAP was an integral part of the General Plan. It is difficult to understand how or why the County would amend its General Plan via the GHG-intensive Project absent first knowing where it is going in terms of addressing climate change. Indeed, absent a valid CAP, it may not be legally permissible to amend the plan in such a major way.	The County acknowledges that its CAP was invalidated; however, overall, the proposed Project land use map has lower land use intensities than existing land use designations. While the comment asserts that the proposed Project is "GHG intensive", in fact, the existing land use designations allow for far more development as shown on Table 1-1A in Chapter 1 of the SEIR. The lower intensity of the proposed Project would reduce the subdivision capacity within the Project area by 8,849 lots, when compared to the existing land use designations (No Project alternative), [see <i>Draft SEIR, Chapter 1, Table 1-1C</i>]. The commenter refers to "the GHG-intensive Project"; however, no such Project alternative employs this nomenclature. A CAP is not required for the County to process discretionary or ministerial project applications. Further, the reference to illegality of processing general plan amendments due to the lack of an adopted CAP is unsubstantiated and the County is unaware of any law, policy or practice that precludes discretionary actions by the Board of Supervisors in the absence of a CAP.
L-37	EHL therefore urges the County should adopt a legally valid revised CAP <i>prior to</i> the FCI Amendment. Otherwise, this GPA will face the twin burdens of 1) General Plan consistency when an important component of that plan – the CAP – is no longer valid and 2) providing alternative enforceable mechanisms for GHG reduction, as the invalidated CAP did not.	The County does not agree with delaying this Project until a CAP is adopted, as discussed in response to Comment L-36.
L-38	The Modified Project alternative is less intensive than the proposed Project and would result in less environmental impacts. This alternative would support build-out of approximately 4,521 residential dwelling units, or	The County agrees with the comment, which is not inconsistent with the analysis in the Draft SEIR. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be

	<p>approximately 1,724 less than the proposed Project. (Table 4-4) When compared to the proposed Project, this alternative would primarily involve the re-designation of Semi-Rural lands (SR-10) and Rural lands (SR-20) to the lowest density rural land use designations allowed by the General Plan (SR-40 and SR-80), thereby increasing the amount of Rural lands by 2,952 acres as compared to the proposed Project. (Table 4-2)</p>	<p>considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine whether to approve the Proposed Project or an alternative to the Project.</p>
L-39	<p>CEQA outright prohibits the City from approving projects with significant environmental effects if there are feasible alternatives or mitigation measures that can “avoid or substantially lessen” those effects. (Pub. Resources Code § 21002.) This substantive mandate operates through a series of required findings that <i>must</i> be made and supported with credible, substantial evidence. Specifically, before the County may approve a project with significant environmental impacts, a lead agency must make two sets of findings under CEQA. The first must address how the agency responds to significant effects identified in the environmental review process, either by finding that these effects will be mitigated, or that “[s]pecific economic, legal, technological, or other considerations . . . make <i>infeasible</i> the mitigation measures or <i>project alternatives</i> identified in the final EIR.” (CEQA Guidelines § 15091, subd. (a)(3).) The second set concerns any statement of overriding considerations, permitting an agency to approve a project despite the existence of significant environmental impacts. (CEQA Guidelines, § 15093.) Because the findings requirements implement CEQA’s substantive mandate that public agencies refrain from approving projects with significant environmental impacts when there are feasible alternatives or mitigation measures that can lessen or avoid these impacts, an agency is prohibited from reaching the second set until it has properly addressed the first. (See CEQA Guidelines, § 15091, subd. (f), subd. (c); <i>Mountain Lion Foundation v. Fish & Game Commission</i> (1997) 16 Cal. 4th 105, 134.)¹</p>	<p>This comment quotes specific provisions of the CEQA Guidelines, but is augmented with the commenter’s interpretation of the cited guidelines; the County does not agree with all of these interpretations. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.</p>

	<p>These findings must be supported by substantial evidence in the record. (Pub. Res. Code § 21081.5; CEQA Guidelines, § 15091, subd. (b).) Any finding that an alternative is infeasible must not only reflect a reasoned analysis, but must be based on specific and concrete evidence. For example, in <i>Citizens of Goleta Valley v. Board of Supervisors</i> (1988) 197 Cal.App.3d 1167, the court rejected a finding of infeasibility of alternatives based on conclusory assertions of unacceptable cost, noting that: “The fact that an alternative may be more expensive or less profitable is not sufficient to show that the alternative is financially infeasible. What is required is <i>evidence</i> that the additional costs or lost profitability are sufficiently severe as to render it impractical to proceed with the project.” (Id. at p. 1181.)</p> <p>Only if this finding of infeasibility can properly be made may a lead agency rely on a statement of overriding considerations.</p>	
L-40 and L-41	<p>Here, as explained below, the Modified Project outperforms or is equal to the proposed Project or any of the other project alternatives considered in meeting every stated project objective, and no substantial evidence exists to support a finding of its infeasibility. Pub. Res. Code §21082.2(c) (Substantial evidence excludes “[a]rgument, speculation, unsubstantiated opinion or narrative, [and] evidence which is clearly inaccurate or erroneous...”); <i>see also Californians for Alternatives to Toxics v. Dept. of Food & Agric.</i> (2005) 136 Cal.App.4th 1, 17 (“[C]onclusory statements do not fit the CEQA bill.”). As is demonstrated below, the only alternative for which these required findings may be made is the environmentally superior, Modified Project alternative.</p>	<p>These comments references a “Modified Project” alternative, which is the environmentally superior alternative for the Draft SEIR circulated for public review in 2013. There is not a Modified Project alternative in the Draft SEIR recirculated for public review in 2016. It is reasonable to assume the commenter is actually referencing the “Modified FCI Condition” alternative, which is the environmentally superior alternative for the Draft SEIR circulated for public review in 2016. These comments are an introduction to comments that follow. No further response is required.</p>
L-42	<p>The County in the SEIR has already acknowledged that the Modified Alternative would “decreas[e] environmental impacts in <i>all</i> issue areas evaluated.” (SEIR at p. S-7, emphasis added.) It therefore cannot be subject to reasonable dispute that adoption of the Modified Project alternative would “substantially lessen” those impacts within the meaning of</p>	<p>The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine whether to approve the Proposed Project or an alternative to the Project. See Responses to Comments L-3, L-4, L-40 and L-41. The</p>

	CEQA's substantive mandate. (See Pub. Resources Code § 21002; Guidelines §§ 15021(a)(2), 15126.6(b); (<i>City of Marina v. Bd. of Trustees of the California State Univ.</i> (2006) 39 Cal. 4th 341, 350.)	Modified FCI Condition alternative was identified as the environmentally superior alternative, consistent with CEQA Guideline 15126.6. The SEIR is not intended to dispute adoption of the proposed Project or any of the alternatives. The SEIR has evaluated and disclosed the potential significant impacts of the proposed Project and alternatives, identified feasible mitigation and discloses those resources for which impacts would be considered significant and unavoidable. While the Modified FCI Condition alternative does reduce the severity of impacts when compared to the proposed Project, the resources for which an impact has been determined to be significant and unavoidable remains the same for each alternative, except for the No Project alternative which would result in additional resource areas having significant and immitigable impacts. See also, Global Response 1 (GR-1).
L-43	The Modified Project alternative would also more fully meet every stated Project objective and therefore more faithfully implement the adopted General Plan's Guiding Principles. The following discussion addresses each objective:	The determination of how an alternative satisfies or "more fully meets" a Project objective is at the discretion of the local agency; for the FCI Lands GPA the Board of Supervisors will make the determination of meeting Project objectives. See also, Global Response 1 (GR-1) and Responses to Comment L-3, L-4, L-40 through L-42.
L-44	The Project would contain 6,245 units at build-out. (Table 4-4) The Modified Project has 4,521 units. The reality is, however, that <i>none</i> of this growth is needed to accommodate regional population growth, because the Draft Map analyzed during the 2011 General Plan Update, which contains significantly less growth than the adopted general plan, <i>already</i> accommodated anticipated regional growth. Adding growth on top of this actually <i>undermines</i> General Plan objectives. EHL made this point persuasively in its comments on the PEIR for the Update. ² For this reason, the Modified Project actually outperforms the Project on this objective.	The FCI lands were not included (provided land use designations) in the 2011 General Plan Update, although densities associated with the FCI lands were assumed (generally at 1:40 or 1:80) for overall General Plan implementation impact determination. The primary purpose of this Project (FCI Lands GPA) is to assign land use designations to the FCI lands that were not included in the General Plan Update, consistent with the Project objectives and General Plan Guiding Principles. The comment correctly identifies the potential dwelling units at buildout of the proposed Project and the Modified FCI Condition alternative. The determination of whether or not an alternative satisfies, or outperforms another in fulfilling a Project objective is at the discretion of the local agency; for the FCI Lands GPA the Board of Supervisors will make the determination of meeting project objectives. The comment does not raise an issue concerning the sufficiency of the analysis in the

		Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine whether to approve the Proposed Project or an alternative to the Project. See also, Global Response 1 (GR-1) and Responses to Comments L-40 and L-42.
L-45	<p>"In a DPLU staff analysis of the ability of the Draft and Referral Maps to meet Plan Update objectives, planners concluded that the Draft Map fully met regional growth objectives, coming in slightly over the target population. (See <i>Land Use Scenario Comparison</i>, May 2004.) Maps significantly exceeding the population target, i.e., by 2 to 3%, were deemed inferior, since the additional growth in unincorporated areas was inconsistent with other planning objectives: "Scenarios within 2 to 3 percent of the County's target population are evaluated as "meeting" [the population] objective. Higher populations were not because additional capacity increases costs for both infrastructure and essential services." (See <i>Land Use Scenario Comparison</i>, May 2004, p. G-2, footnote.)</p>	<p>The comment is a footnote to Comment L-44, and is text taken from the General Plan Update FEIR, Volume III, Responses to Comments and represents EHL's comment G5-32. In the 2011 GPU FEIR, the County responded to this comment as follows:</p> <p><i>The commenter refers to past staff analysis from a 2004 Board report. Fulfillment of the objective of "supporting a reasonable share of population growth" will be determined by the Board of Supervisors. Additionally, it should be noted that the outcome of that 2004 Board hearing was the initial creation of the Referral Map (then referred to as the Consensus Alternative Map).</i></p> <p>See also, Global Response 1 (GR-1).</p>
L-46	<p>According to County staff, "All Board Referrals scenarios [i.e., the proposed project] add unnecessary population capacity" and thus do <i>not</i> meet the goal of accommodating a <i>reasonable share</i> of growth. (See <i>Land Use Scenario Comparison</i>, May 2004, p. G-3.) For this reason, staff concluded in a May 2004 analysis that the "April 2004 Working Copy Map [precursor to the Draft Map] best meets GP2020 [Update] project objectives and the Board-endorsed planning concepts, Land Use Framework, and Draft Goals and Policies." (See <i>Land Use Scenario Comparison</i>, May 2004, p. G-3) Staff further noted that: "[a]ll Board referrals scenarios contain some residential designations that do not fit the proposed GP2020 planning principles. Including these exceptions could jeopardize the planning principles used to develop the GP2020 maps." (See <i>Land Use Scenario Comparison</i>, May 2004, p. G-2, footnote.)</p>	<p>The comment is an additional footnote to Comment L-44, and is text taken from the General Plan Update FEIR, Volume III, Responses to Comments and represents EHL's comment G5-33. In the 2011 GPU FEIR, the County responded to this comment as follows:</p> <p><i>The commenter again quotes past staff analysis. However, the Board of Supervisors will ultimately determine how the County can best meet its project objectives and will judge the adequacy of the project.</i></p> <p>See also, Global Response 1 (GR-1). No further response is required.</p>
L-47	The SEIR acknowledges that by increasing densities (relative to	See Response to Comment L-40 in regards to the "Modified Project"

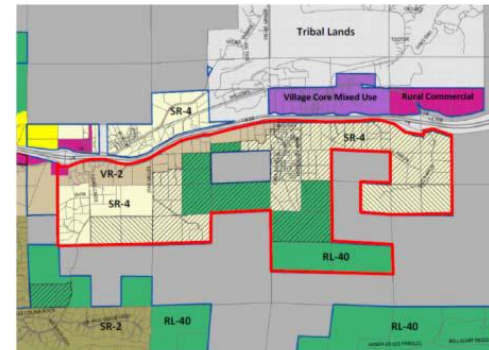
	the Modified Project) in remote forest in-holdings, the Project undermines this objective relative to the Modified Project.	<p>alternative. The County agrees that Project objectives strive to minimize development potential in remote forest in-holdings. However, in the Draft SEIR Chapter 4, Section 4.1.1 Alternatives Considered but Rejected, the County rejected the FCI Condition alternative because it assigned a rural density of one dwelling unit per 40 acres uniformly based on the assumption that all lands are remote forest in-holdings. In Section 4.1.1, FCI Density alternative, the analysis shows that this alternative would not be consistent with the Project objective to reinforce the vitality, local economy, and individual character of existing communities while balancing housing, employment, and recreational opportunities. The Board of Supervisors will consider the ability of the alternatives to meet the project's basic objectives and will make the required findings. The comment will be included in the administrative record that will be considered by the Board.</p> <p>See also, Global Response 1 (GR-1).</p>
L-48	Both the Project and the Modified Project will increase the number of local residents who use local businesses. However, by adding excessive Village residential development in the community of Alpine, the Project will create mobility issues and thereby adversely impact the character and vitality of this local community. While the Modified Alternative that EHL supports does not have the expanded Village Residential and Commercial component of the Project, there is no showing that this addition will provide a net benefit to the existing community of Alpine. Even if it did, less impactful alternatives that would impede attainment of project objectives to some degree should not be rejected as infeasible. (Guidelines § 15126.6(b).)	<p>See Response to Comment L-40 in regards to the "Modified Project" alternative. The FCI Lands GPA intends to establish land use designations consistent with the Guiding Principles of the General Plan. Subsequent development consistent with the eventually adopted land use designations may generate additional residents in the future. The County does not agree that the proposed Project or alternatives represent excessive residential development potential and no rationale is presented to substantiate the claim. CEQA requires the disclosure of potential impacts and feasible means to lessen the severity of those impacts. CEQA does not require the determination of project benefits from proposed projects or alternatives. Moreover, the Modified FCI Condition alternative was not rejected as infeasible as the comment suggests, and was presented as a Project alternative and analyzed as such within Chapter 4. See also, Global Response 1 (GR-1).</p>
L-49	The SEIR acknowledges that the Project will further fragment and degrade the high habitat values of these remote and biologically intact in-holdings. The designations denser than 1:40 du/acre are particularly fragmenting to habitat, and the Project contains a much higher proportion of these land use	<p>See Response to Comment L-40 in regards to the "Modified Project" alternative. The County agrees that densities of RL-40 or lower have less potential to fragment and degrade high habitat values of remote biologically intact in-holdings. As shown on Draft SEIR Chapter 4, Table 4-9, Biological Resources Impacts Comparison, the Modified FCI</p>

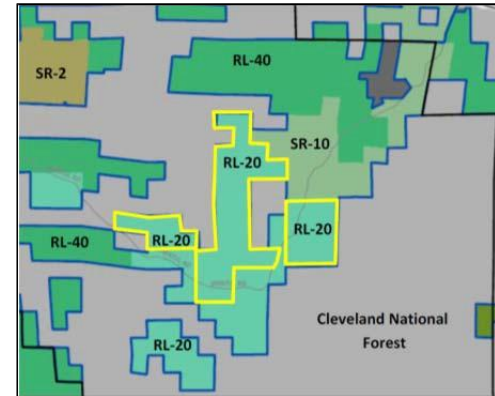
	designations in sensitive, remote areas relative to the Modified Project.	Condition alternative would potentially impact 10,432 acres of sensitive vegetation, which is 1,824 fewer acres than the proposed Project. Also see Global Response 1 (GR-1).
L-50	The critical natural hazard in the FCI areas is fire risk. By increasing the densities and number of units in these remote and rugged high-fuel areas relative to the Modified Project, the Project strongly undermines this goal on a relative basis.	See Response to Comment L-40 in regards to the “Modified Project” alternative. . See Global Response 1 (GR-1). Also, see Global Response 2 (GR-2), the proposed Project and the alternatives do not propose an increase in density from the current land use designations.
L-51	While neither the Project nor the Modified Project provide land use configurations that support multi-modal transportation, the lower unit count of the Modified Project reduces the overall number of units in locations inaccessible to transit relative to the Project.	See Response to Comment L-40 in regards to the “Modified Project” alternative. The County agrees with this comment that the densities proposed by Modified FCI Condition alternative would not support multi-modal transportation. Both the proposed Project and Modified FCI Condition alternative reduce overall number of units in remote areas inaccessible to transit as compared to the existing condition (see Global Response 2 (GR-2)).
L-52	Neither the Project nor the Modified Project provides land use configurations that reduce automobile trips. Both permit additional housing in far-flung locations distant from jobs and services. However, the lower unit count of the Modified Project compared to the Project reduces the overall number of units in locations that would generate long commutes and trip to distant services, thereby causing less GHG emissions on a relative basis. Largely but not exclusively due to Alpine, there are huge increases in VMT and resulting GHG emissions in the Project compared to the Modified Project. According to Tables 4-8 and 4-12, there are about 5 <i>times</i> as much mobile source emissions in the Project versus the Modified Project, and about 5 <i>times</i> the amount of new average daily traffic generation (114,264 compared to 21,674).	See Response to Comment L-40 in regards to the “Modified Project” alternative. The County does not agree with the commenter’s editorial characterizations that both alternatives “permit additional housing in far-flung locations distant from jobs and services” (see also Global Response 2 (GR-2)). However, the recital of information in Tables 4-8 and 4-12 is generally accurate. See Global Response 1 (GR-1). The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR.
L-53	The former FCI lands contain little agricultural activity. To the extent that it does, however, the lower overall densities of the Modified Project relative to the Project will better preserve existing and future agricultural development opportunities.	See Response to Comment L-40 in regards to the “Modified Project” alternative. The County does not agree with this comment that the Modified FCI Condition alternative “will better preserve existing and future agriculture development opportunities.” As shown in Draft SEIR Table 4-6, Comparison of Alternatives – County Identified Agricultural Lands and Impact Estimates, the number of acres of agricultural lands

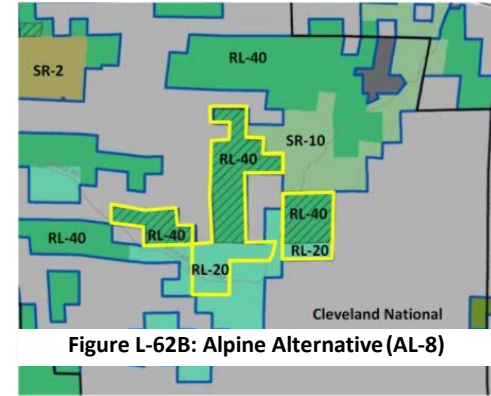
		impacted by the Modified FCI Condition alternative is the same as those impacted by the proposed Project. See also Global Response 1 (GR-1).
L-54	Both the Project and the Modified Project would designate development in highly remote locations that are highly expensive to provide with infrastructure and emergency and other public services. However, the lower unit count of the Modified Project compared to the Project reduces the overall number of units requiring service and infrastructure in remote locations.	<p>The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine whether to approve the Proposed Project or an alternative to the Project.</p> <p>See Response to Comment L-40 in regards to the “Modified Project” alternative. The County does not agree that both the Draft SEIR proposed Project and Modified FCI Condition alternative would designate development in highly remote locations. The proposed Project assigns 84% and the Modified FCI Condition assigns 89% of the acres associated with the Project areas with Rural Lands land use designations. This is substantially more than the 4% Rural Lands designations of the No Project alternative (see also, Global Response 2 (GR-2). In addition, new development at the Rural Lands densities allowed by the proposed Project for these remote locations would be scattered low density development that would not require the expansion of public infrastructure as the majority of residential units anticipated to be constructed within the Project areas are single-family homes capable of supplying their own potable water via private wells and addressing water needs on-site via alternative water treatment systems, i.e. septic.</p>
L-55	The FCI GPA process is a continuation of the extensive public outreach process that resulted in the Update. While there are elements of the community and stakeholders in support of all the alternatives, it is important to remember that key stakeholders (including EHL and the Forest Service) as well as members of the community throughout the County firmly believe in the Project objectives incorporated in the General Plan and wish to see them followed.	The County agrees that the Project objectives of the General Plan, which are also the same for the FCI Lands GPA, are important to stakeholders and should guide the development of the FCI Lands GPA Project and alternatives. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
L-56	While it is impossible to say definitively what the relevant community is, much less poll its feelings on the various	The County agrees that determining the public interest is a never ending endeavor for all public agencies, but that is the mission of

	alternatives, neither local landholders nor even a specific local community can conclusively represent the broader county public interest that should guide the County-wide General Plan process. The community and stakeholders are best served by even-handed and objective application of the General Plan Guiding Principles to specific areas and problems presented. For this reason, and because the Modified Alternative most closely adheres to the vast majority of these Principles, the Modified Alternative is the best expression of community and stakeholder interests considered as a whole.	governance. The County appreciates the commenter's opinion regarding the Modified FCI Alternative. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. See also Response to Comments L-40 through L-42.
L-57	The 2011 General Plan assigned Rural densities in locations with high fire hazard, high habitat values, and/or lack of infrastructure and services. Exceptions to these Guiding Principles, Goals, and Policies occurred where existing parcelization precluded such Rural designations. Inconsistent with the practices of the 2011 General Plan, the Project – particularly but not exclusively in the hillsides of Alpine in AL5, 6, 7, and 8 – assigns Semi-Rural or R-20 densities absent existing parcelization. Such mis-assignment treats parcels elsewhere in the County but with similar characteristics differently, creating inequities among property owners. The Modified Project is markedly superior in assigning Rural densities in a manner consistent with the Guiding Principles, Goals, and Policies of the adopted General Plan.	See Response to Comment L-40 in regards to the “Modified Project” alternative. The County agrees that the GPU generally assigned Rural Lands designations in areas with large parcel sizes that lack infrastructure and services, have a high habitat value and are located in a very high or high fire hazard area. Correspondingly, the Draft SEIR proposed Project assigns Rural Lands designations to portions of AL 7 and to all of AL 8. However, the Project objective derived from the Guiding Principles to avoid site constraints is not the only planning objective considered during the GPU or the FCI Lands GPA. All of the Project objectives found in Chapter 1 of the SEIR were considered when assigning land use designations in AL 5 and AL 6 under the proposed Project. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine whether to approve the Proposed Project or an alternative to the Project.
L-58	To take one specific policy example, reducing fire hazard was a prime determinant of general plan densities. LU-6.11 states, “Protection from Wildfires and Unmitigable Hazards. Assign land uses and densities in a manner that minimizes development in extreme, very high and high fire threat areas or other unmitigable hazardous areas.” The carpeting of extremely fire prone hillsides in Alpine – <i>with histories of</i>	The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine whether to approve the Proposed Project or an alternative to the Project. See Response to Comment L-40 in regards to the “Modified Project”

	<p><i>multiple burns</i> – with Semi-Rural densities is a flagrant and inexcusable violation of the policy to minimize such inherently dangerous development. To the contrary, the Modified Alternative places appropriate Rural densities in these locations. Throughout the rest of the County, Rural densities were applied to high fire risk lands. The Project would create glaring and, indeed irresponsible, exceptions.</p>	<p>alternative. The County acknowledges that, as shown on Draft SEIR Figure 2.6-3, most of the Project area within the Alpine CPA is located within a very high fire hazard severity zone, as are the currently developed portions of Alpine (both Village and Semi-rural densities). The proposed Project attempts to balance the environmental issues noted in this comment with the need for future development in the Alpine community based on public comments received in response to the environmental analysis in the Draft SEIR circulated in 2013 and at public hearings.</p>
L-59	<p>The United States Forest Service, in its comment letters, clearly identifies densities higher than the lowest Rural categories as creating conflicts with Forest management. Higher densities of human use and associated roadways are directly related to fire starts, a grave threat to the Cleveland National Forest. Greater adjacent density causes more human intrusion with adverse effects on wildlife and greater management costs. Landscaping leads to invasive plant and animal species. The Modified Project follows Forest Service recommendations – particularly but not exclusively in Alpine – far more closely and minimizes conflicts relative to the Project and the other alternatives.</p>	<p>The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine whether to approve the Proposed Project or an alternative to the Project.</p> <p>See Response to Comment L-40 in regards to the “Modified Project” alternative. The County acknowledges these general concerns of the U.S. Forest Service about potential conflicts when increasing density adjacent to the Cleveland National Forest (CNF) lands. The County is not proposing to construct housing units in any Project area. Rather, the County is proposing to designate the former FCI lands consistent with the County’s General Plan land use designations. Currently, the FCI lands have pre-FCI densities (1978 General Plan), which are considered too intense based on the County’s 2011 General Plan Guiding Principles (see Global Response 2 (GR-2)). The County is proposing land use designations and densities based on existing land uses, environmental constraints and surrounding conditions.</p>
L-60	<p>The Alpine Alternative Is Similarly Flawed</p> <p>In the Alpine Alternative, the linear Village is extended eastward as in the Project, but otherwise the Study Area of Alpine 5, 6, and 7 retains “existing General Plan” densities (Semi-Rural and Rural). Ultimate planning would await economic studies, although such economic factors should not be determinative. Also, for Alpine 8, a split designation of RL-40 and RL-20 is applied rather</p>	<p>See Response to Comment L-40 in regards to the “Modified Project” alternative. This comment generally characterizes the Alpine Land Use Map alternative in Project areas east (AL-5,6,7) and south of the Alpine Village (AL-8). The Alpine Alternative Land Use Map alternative for AL-5,6,7) is shown outlined in red on Figure L-60, which is an excerpt from Draft SEIR Figure 4-3B. The Alpine Alternative Land Use Map alternative for AL-8) is shown outlined in red on Figure L-62B, which is an excerpt from Draft SEIR Figure 4-3A. (Please note that hatched</p>

	<p>than the Project's uniform RL-20. For the same reasons described above, the lower densities of the Modified Project are both superior and feasible compared to the higher densities of the Alpine Alternative. Indeed, staff's own description of the constraints and hazards of these locations in its 2014 report to the Board of Supervisors – quoted below with emphasis added – paints a grim picture, particularly in terms of repeated wildfire conflagrations. Development at other than rural densities is the height of irresponsibility.</p>	<p>areas on these figures show areas of difference with the proposed Project.) The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine whether to approve the Proposed Project or an alternative to the Project.</p>	 <p>The map displays various land use designations. A legend at the top right identifies 'Tribal Lands' (grey), 'Village Core Mixed Use' (purple), and 'Rural Commercial' (pink). The map area includes several labeled zones: 'SR-4' (yellow), 'VR-2' (green), 'RL-40' (green), and 'SR-2' (yellow). A red outline highlights a specific area within the SR-4 and VR-2 zones.</p>
L-61	<p><i>The southeastern parcels (AL-7) contain steep slopes that exceed 25% (refer to Figure 1 above). Very High and High Sensitivity Biological Habitat associated with wetlands and oak woodlands are located primarily in the southern portions of the area (refer to yellow and pink areas in Figure 3 above). The entire area is located within the Very High Fire Hazard Severity Zone and contains some areas that have burned five or more times in the past 90 years (refer to Figure 4 above). In addition, the entire area is groundwater dependent with a five-acre minimum lot size per the County Groundwater Ordinance. Alpine AL-8 contains 23 parcels that range in size from 4.7 to 355 acres for a total of 1,748 acres. Currently, this area of consideration is sparsely developed with some agriculture and support structures. The area is located approximately 2.3 miles east of Loveland Reservoir along Japatul Valley Road and Japatul Road approximately 3.7 miles southwest of Interstate 8. AL-8 is outside of the County Water Authority boundary and surrounded by the Cleveland National Forest (CNF) in a federally-designated wilderness area. Portions of the area are constrained by steep slopes (refer to Figure-1). Also, approximately one-third of AL-8 is more than one-half</i></p>	<p>The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine whether to approve the Proposed Project or an alternative to the Project.</p> <p>The comment quotes text taken directly from the staff report for the June 25, 2014 Board of Supervisors hearing where the Board of Supervisors considered land use alternatives, which can be found on the Project web site (see page 3) at: http://www.sandiegocounty.gov/content/dam/sdc/dplu/advance/docs/FCI/bos/c.al0567analysis.pdf. With a few exceptions, the land use map endorsed by the Board of Supervisors at this hearing became the proposed Project for the Draft SEIR. The staff report will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.</p>	

	<p><i>mile from the nearest County maintained road (refer to Figure- 2). This area contains approximately 131 acres of High Value Biological Habitat (refer to Figure-3). Some properties contain farmland of local importance, grazing land and prime agricultural land. Nearly all of the parcels are located within the Very High Fire Hazard Severity Zone with some areas of AL-8 burning up to four times in the past 90 years (see Figure-4).</i></p>	
L-62	<p>Regarding Alpine 8, due to fire hazard and other constraints, and consistent with the way similar areas in the 2011 Update were treated, these remote lands should all be designated at RL 40 or 80. The split designation in the Alpine Alternative, with 49 units, is a compromise only preferable by virtue of comparison with the Project, which contains 14 fully <i>double</i> the build-out units of the Modified Project (80 vs 40) in this area of extreme fire hazard.</p>	<p>This comment addresses the area in Alpine referred to as AL 8 in Attachment C of the June 25, 2014 Board of Supervisors staff report. This area is shown outlined in yellow on the Figures L-62A and L-62B taken from excerpts from the Draft SEIR Figure 1-2A (Proposed Project) and the Draft SEIR Figure 4-3A (Alpine Alternative Land Use Map alternative). The proposed Project assigns a RL-20 designation (one dwelling unit per 20 acres) to the entire area, which would result in a potential buildout of 81 dwelling units. The comment is correct that the Alpine Alternative Land Use Map alternative, which proposes a RL-40 designation (one dwelling unit per 40 acres) to the larger parcels and RL-20 to the smaller parcels accessible or in the close vicinity to Japatul Valley Road, would result in a potential buildout of 49 dwelling units.</p>  <p>Figure L-62A: Proposed Project (AL-8)</p>

		<p>The Draft SEIR does not differentiate this area with a separate analysis; all Project areas are evaluated but do not have their own individual impact determination. The comment concerns the commenter's opinion on the merits of the Alpine Alternative and does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment, along with the June 25, 2014 staff report will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine whether to approve the Proposed Project or an alternative to the Project.</p>	 <p>Figure L-62B: Alpine Alternative (AL-8)</p>
L-63	<p>For Alpine 5, 6, and 7, there are two practical ways to reconcile, or significantly reconcile, environmental concerns that should be analyzed as alternatives in the SEIR:</p> <p>1) Transfer of development rights: The enormous up-planning of the Village creates a unique and obvious opportunity for a <i>transfer of development rights program</i> within this finite and circumscribed area. Units outside of the Village in excess of Rural densities would be purchased by those obtaining the windfall of up-planning. The baseline for assigning transferable units would be the existing General Plan corrected for slope constraints.</p>	<p>This comment proposes the creation of a transfer of development rights (TDR) program which is not proposed within the FCI Lands GPA and is not an adopted program of the County. A TDR program was considered during the 2011 General Plan Update, but ultimately rejected by the County Board of Supervisors. The County provided the rationale why a transfer of development program was not feasible as part of the General Plan Update in Response to GPU EIR Comment G8-8. The County's response is available at: http://www.sandiegocounty.gov/content/dam/sdc/pds/gpupdate/doc/s/BOS_Aug2011/EIR/G3.04_Section_G_Interest_Group.pdf</p> <p>The comment also refers to "the existing General Plan" however, it is unclear which General Plan (2011 General Plan vs. the pre-FCI General Plan) is being referenced given the misinterpretation of the controlling land uses previously advanced within the comment letter. Please see Global Response 2 (GR-2). Consistent with the County's position on which land use designations currently apply to the FCI Lands GPA Project areas, land use designations consistent with the 2011 General Plan would first be established and subsequently a TDR program developed and implemented. However, as discussed above, the County</p>	

		Board of Supervisors recently rejected the concept of a TDR program for the County as infeasible. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project; however, offers no new information which would compel the Board to reconsider their determination.
L-64	2) Study Area boundary modification: <i>Shrinking</i> the proposed Study Area could minimize its most egregious flaws. Specifically, the Village and immediately adjacent areas would be retained for future study. However, the more remote, southerly portions – those most threatened by fire and those most important for National Forest land use compatibility – would be properly designated as Rural <i>at this time</i> . This option – called the Modified Alpine Alternative and further described below – is both superior and feasible from a CEQA perspective.	<p>The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.</p> <p>The comment attempts to address an as yet funded study in the community of Alpine to further analyze the potential for increased development balanced with the costs of necessary infrastructure improvements and expansion, and site constraints such as slopes, fire hazards and biological resources. The Comment begins to formulate an alternative that was not considered and was not offered at the time (August 30 to September 28, 2012) the County provided the Notice of Preparation for this SEIR. The Minute Order within which the special study is directed the Board of Supervisors on June 25, 2014, can be viewed at: http://www.sandiegocounty.gov/content/dam/sdc/dplu/advance/docs/FCI/bos/fciminuteorder062514.pdf</p> <p>In this Minute Order, under Action 1.8, the Board: <i>Directed the Chief Administrative Officer to work with the Community Planning Group, U.S. Forest Service, and the property owners to develop boundaries for a special study area to determine the appropriate land use densities;</i></p> <p>The Minute Order did not direct staff to analyze the special study</p>
L-65	Modified Alpine Alternative The great majority of the Project's defects arise in Alpine, particularly in Alpine 5, 6, 7, and 8 where Semi-Rural densities are wrongly applied and where a Village expansion greatly increases vehicle trips and GHG emissions. The "Alpine Alternative" would "white hole" the non-Village part of Alpine 5, 6 and 7, retaining old General Plan densities pending	This comment contends that "Semi-Rural densities are wrongly applied" in Alpine, particularly in the areas referred to as AL-5,6,7 (see Response to Comment L-60) and AL-8 (see Response to Comment L-62) resulting in "Project's defects." The County does not agree with the comment's characterization of the proposed Project semi-rural densities in the Alpine Project areas because as shown in Figure L-62B, Rural Lands designations of RL-20 and RL-40 are assigned rather than

	infrastructure and service studies. Alpine 8 would revert to a “compromise” of densities advanced by the Planning Commission.	Semi-Rural densities as the commenter asserts. It is unclear what “white hole” in the non-Village parts of Alpine means. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR, but provides the commenter’s opinion on the merits of the Project. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
L-66	<p>EHL suggests also considering a <i>variation</i> on the Alpine Alternative which corrects the worst mis-applications of Semi-Rural designations while, logically, leaving study options open for the Village and immediately adjacent locations. Lower Rural densities would be applied in the more southerly tiers of parcels, corresponding to those with greatest impacts on the Forest and those most distant from the Village. The Study Area would be retained for the Village location, immediately adjacent lands, and for already parcelized locations. In this way, the most severe Guiding Principles, Goals, and Policies inconsistencies would be remedied at this time, improving fire safety, Forest compatibility, and habitat values. Simultaneously, the areas most appropriate for Village expansion, and potentially for immediately adjacent Semi-Rural use, would remain for future study per prior Board direction. This option would retain the Alpine 8 compromise. An example of this variation is shown on the accompanying <i>Modified Alpine Alternative</i> exhibit, where the retained and reduced Study Area is hatched and appropriate Rural designations are applied to the southerly tiers of the original Study Area.</p>	<p>This comment proposes a variation on the Alpine Alternative Land Use Map alternative where a RL-40 designation would be assigned to the area outlined in red on Figure L-66, which is an excerpt from Draft SEIR Figure 4-3B. As shown on figure L-66, the Alpine Alternative Land Use Map alternative assigns a combination of RL-40 and SR-4, which reflect existing densities (No Project alternative). As shown on Draft SEIR Figure 1-2B, the proposed Project assigns a range of designations from Semi-Rural 2 (SR-2) through RL-40. Under CEQA Guidelines Section 15126.6(a), (c), an EIR need discuss only a range of reasonable alternatives. An EIR is not required to discuss every possible variation or proposal.</p> <p>The proposal also does not explain how it meets Project Objectives or reduce potential impacts identified by the proposed Project. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine the final land use designations for the Project.</p>
L-67	While not as environmentally beneficial as the Modified Project, the Modified Alpine Alternative is nevertheless a pragmatic option that would allow the County to pursue	The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in

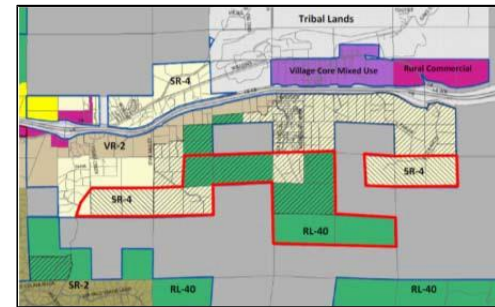


Figure L-66

	planned future studies along a far more responsible – and CEQA-compliant – course than the original Alpine Alternative.	evaluating the Project. Ultimately, the Board of Supervisors will determine the final land use designations for the Project. The comment characterizes its proposed alternative as a “pragmatic approach”; however, CEQA requires project alternatives to lessen the severity of identified impacts while also meeting the majority of project objectives.
L-68	<p>Conclusion</p> <p>The above discussion demonstrates that the Modified Alternative not only substantially lessens virtually all the significant impacts of the Project and it better satisfies the overwhelming majority of Project objectives. It is well settled that “[i]f there are feasible alternatives or feasible mitigation measures that would accomplish <i>most</i> of the objectives of a project and substantially lessen the significant environmental effects of a project subject to CEQA, <i>the project may not be approved without incorporating those measures.</i>” (<i>Center for Biological Diversity, Inc. v. FPL Group, Inc.</i> (2008) 166 Cal.App.4th 1349, 1371 fn 19, emphasis added, [citation to Pub. Resources Code §§ 21000(g), 21002, Guidelines § 15091].) For this reason, CEQA requires adoption of the Modified alternative or something very closely resembling it.</p>	See Responses to Comments L-1 through L-67. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine whether to approve the Proposed Project or an alternative to the Project.

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	Comment	Response to Comment
M-1	I have been working with Ms. McCall for several years to find an avenue that would allow her to develop the historic cottages on her 4+ acre parcel into an Artist's Colony.	The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the record and will be considered by the decision maker. This comment is an introduction to comments that follow. The subject property, located in the Alpine Community Planning Area, is assessor parcel number 404-073-09.
M-2	She has owned the property since the late 70's, and her only recourse until now has been to rent them as residential units. The noise study she commissioned in 2013, done by Rick Tavares of ISE stated that "future noise would completely inundate the site and, in some cases, would exceed the 75-dBA "no residential build" standard. Given this, it is not unreasonable from an acoustical perspective to develop the site...as a commercial use, since uses of this type are typically classified as insensitive, or non sensitive to noise."	<p>The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR, but concerns the commenter's preference for the proposed Project. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.</p> <p>The County agrees that noise levels of 75 community noise equivalent level (CNEL) or higher are not suitable for residential uses (refer to General Plan Noise Element, Table N-1). The SEIR also identifies mitigation to reduce noise impacts, as shown below.</p> <ul style="list-style-type: none"> • Section 2.10.4.1 — General Plan Policies M-2.4: Roadway Noise Buffers, N-4.2: Traffic Calming, and mitigation Noi-1.4. • Section 2.10.4.3 — N-4.6: Road Improvement Projects and mitigation Noi-3.1.
M-3	Mrs. McCall would have greatly preferred the classification of Rural Commercial. However, she has been persuaded that the county will stand by its commitment to support the "special zoning designation" in SR-4 that will allow her to proceed with the development of her Colony. It is, and has always been, her intent to pass on the management of this unique piece of Willows history to her many nieces, who also testified at the Planning Commission as to the family interest in pursuing her dream.	<p>This comment expresses the preference of the property owner for a Rural Commercial General Plan designation; however, the property owner has also indicated that zoning that would allow commercial uses in the existing buildings on the property would also be acceptable. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR, but concerns the commenter's preference for a specific zoning use regulation.</p> <p>The proposed Project and all Project alternatives assign a Semi-rural 4 (SR-4, one dwelling unit per four acres) to the subject property. In accordance with the Compatibility Matrix in Section 2050 of the County Zoning Ordinance, a Residential Commercial use regulation is compatible with the SR-4 designation under "special circumstances". Section 2072 of the Zoning Ordinance identifies findings that must be met in order to find that a use regulation is consistent under Special Circumstances.</p> <p>In November 2013, the Planning Commission recommended a</p>

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		Residential Commercial use regulation for this property, based on recommendations by staff that findings can be made to find the use consistent with the compatibility matrix. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
M-4	To the extent that the SEIR does not extend to the “special designation” zoning, I can only say that we look forward to hearing that that is a definite part of the presentation to the Board of Supervisors.	This comment reiterates that the “special designation” (Residential Commercial) be included when the Project is presented for consideration by the Board of Supervisors. The Form of Ordinance proposing zoning changes to the Board of Supervisors will include a Residential Commercial zoning use regulation for the subject parcel. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine the final zoning use regulations for the Project.

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	Comment	Response to Comment
N-1	I must oppose the SEIR recommendation of RL-40 on these particular Japatul Valley lands. The property owners are not asking for anything outside the boundaries of the county's own regulations	This letter addresses the same area as Letters C, D and E where the proposed Project land use map assigns a RL-40 designation or one dwelling unit per 40 acres. The commenter is opposed to this designation. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine the final land use designations for the Project.
N-2	Criteria approved in the recent General Plan Update regarding "dead end roads" specifically allow 20 acre minimum to a distance of a mile from a county maintained road. All of these properties qualify under that ruling.	The comment that the General Plan Update "allows" a 20-acre minimum lot size when one mile from a County-maintained road is not correct. The General Plan does not include specific minimum dead-end road requirements. However, the County Consolidated Fire Code (see page 24) includes a table addressing zoning for parcels served by dead-end road roads. According to this table, for parcels zoned 20 acres or larger, the cumulative length of the allowable dead-end road is one mile. The County Consolidated Fire Code is available on the County web site at: http://www.sandiegocounty.gov/content/dam/sdc/dplu/docs/cosd-fire-code.pdf The 2014 Consolidated Fire Code is based upon the County's 2014 Fire Code as currently amended and adopted in Title 9, Division 6, Chapter 1 of the County Code, subject to the modifications of each fire protection district to the Building Standards Code based upon their respective determinations as to what modifications are reasonably necessary because of local climatic, geological and topographical conditions within the district. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR, but concerns the commenter's preference for a density for the area of one dwelling unit per 20 acres. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
N-3	In addition, they are in close proximity, and in many cases adjacent to, homes on eight acres and less. The topography is gently rolling. There is plenty of water.	This comment identifies the vicinity of the area with parcels eight acres or less in size, the gentle topography and the abundance of water. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluate

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		ng the Project. Ultimately, the Board of Supervisors will determine the final land use designations for the Project.
N-4	Most importantly, we are not talking about a lot of homes. Mary Kay Borchard's property, under this scenario, would have a maximum of 2 more homes. The other owners would cumulatively gain no more than 6 homes over the span of nearly 200 acres.	The County agrees with the dwelling unit calculations in this comment. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine the final land use designations for the Project.
N-5	The impact to this area from the Sunrise Powerlink was devastating. Even now, its' towers loom over the top of the Borchard property. Rural blight in situations such as this is a significant problem. The inability to sell one's property for value adds to this situation.	The comment expresses concern over impacts from the Sunrise Powerlink, which traverses this area. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The Sunrise Powerlink project is not part of this Project and so is not analyzed in the SEIR. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
N-6	I strongly hope that you will reconsider your recommendation. I know that the property owners stand ready to entertain any suggestions you might have, even including restrictive measures and clustering to preserve more open space.	This comment requests consideration of a higher density than the one dwelling unit per 40 acres assigned by the proposed Project. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine whether to approve the Proposed Project or an alternative to the Project.

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O-1	<p>The California Department of Fish and Wildlife (Department) has reviewed the above referenced draft Supplemental Environmental impact Report (SEIR) for the Forest Conservation Initiative Lands General Plan Amendment (Proposed Project). The County requested comments on the SEIR by February 29, 2016. The following statements and comments have been prepared pursuant to the Department's authority as Trustee Agency with jurisdiction over natural resources affected by the project (California Environmental Quality Act, [CEQA) Guidelines § 15386) and pursuant to our authority as a Responsible Agency under CEQA Guidelines section 15381 over those aspects of the proposed project that come under the purview of the California Endangered Species Act (Fish and Game Code § 2050 <i>et seq.</i>) and Fish and Game Code section 1600 <i>et seq.</i> The Department also administers the Natural Community Conservation Planning (NCCP) program (Fish and Game Code§ 2800 <i>et seq.</i>). The County of San Diego (County) participates in the NCCP program by implementing its approved Multiple Species Conservation Program (MSCP) Subarea Plan (SAP), herein referred to as the South County MSCP (SCMSCP).</p>	<p>This comment is an introduction to comments that follow. No further response is required.</p>
O-2	<p>Many of the former Forest Conservation Initiative (FCI) lands are located within the County's draft North County and East County MSCP (NCMSCP and ECMSCP, respectively) planning areas, which are at various level of development and not yet adopted. According to the FCI lands General Plan Amendment (GPA) documentation provided, some lands within the Alpine Community Planning Area occur in the County's existing permitted SCMSCP planning area.</p>	<p>The comment correctly identifies that many of the Project areas are within the County's Draft North and East County MSCP planning areas, but these plans are not yet adopted. The comment further correctly identifies areas within the Project areas located in the community of Alpine as being with the Adopted South County MSCP. The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.</p>
O-3	<p>The Proposed Project involves a GPA to the current San Diego County General Plan, based on the General Plan Update that was adopted on August 3, 2011 . The proposed GPA would change the land use designations for approximately 71,700 acres of former FCI lands, which expired on December 31, 2010. The affected lands are comprised of privately-owned lands in and around the Cleveland National Forest within County unincorporated community planning</p>	<p>This comment reiterates information in the Draft SEIR Chapter 1 Project Description. The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.</p>

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	<p>areas and subregional planning areas (e.g., Alpine, Central Mountain, Desert, Jamul/Dulzura, Julian, Mountain Empire, North Mountain, Pendleton/De Luz, and Ramona). Additionally, the Proposed Project involves changes in land use designations for approximately 400 acres of private lands adjacent to former FCI lands to ensure that the uses anticipated for these lands are consistent with the changes proposed for the former FCI lands. The GPA would include removing the FCI Appendix from the General Plan; amending the Alpine Community Plan; amending the Central Mountain, Jamul/Dulzura, and North Mountain Subregional Plans; and amending the County Zoning Ordinance with new zoning designations to ensure consistency with the GPA.</p>	
O-4	<p>The Department appreciates the County's draft responses to our prior March 18, 2013, draft SEIR comment letter which incorporated many of our recommendations for the Forest Conservation Initiative Lands General Plan Amendment. Revisions to the Proposed Project (as originally circulated in 2013) have prompted the County to recirculate the current SEIR document including revised land use designations, Community/Subregional Plan revisions, a revised General Plan Mobility Element, and cumulative effects analysis. According to the project description "t[T]he proposed Project tiers from the San Diego County General Plan and the General Plan Update Program EIR (PEIR) adopted on August 3, 2011 "</p>	<p>This comment reiterates information in the Project Description. The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.</p>
O-5	<p>We offer the following comments and recommendations to assist the County in avoiding, minimizing, and adequately mitigating project-related impacts to biological resources, and ensure that the Proposed Project is consistent with the County's adopted South County MSCP and ongoing regional habitat conservation planning efforts:</p>	<p>This comment is an introduction to comments that follow. No further response is required.</p>
O-6	<p>1 . The Department is concerned with aspects of the Proposed Project that may affect implementation and coverage of species under the adopted SCMSCP, and affect the ability to cover species in the future NCMSCP and ECMSCP.</p>	<p>The County appreciates this comment. No evidence, rationale or example is provided to support the concern about the ability of the County to process discretionary permit applications consistent with the provisions of the General Plan, Zoning Ordinance or the adopted South County MSCP. The County is not legally able to impose mitigation or</p>

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		conditions of approval on discretionary permit applications derived from draft, as yet adopted planning programs, such as the North County and East County MSCP. Regarding the South County MSCP, no evidence, rationale or example of projects previously approved that are inconsistent with the South County MSCP have been provided to substantiate the concern or indicate an inability of the County to process discretionary permit applications consistent with applicable planning documents and regulatory stipulations as is assumed within the analysis of biological impacts as discussed throughout section 2.4, Biological Resources of the Draft SEIR. See Response to Comment O-7.
O-7	Specifically, we are concerned with the potential for project-related increases in development densities to affect lands within the SCMSCP Pre-approved Mitigation Areas (PAMA), draft NCMSCP PAMA and in-progress ECMSCP Focused Conservation Areas (FCA).	The County does not agree with this comment, which specifically expresses concerns with Project-related increases in densities that affect lands within the SCMSCP Pre-approved Mitigation Areas (PAMA), Draft NCMSCP PAMA and in-progress ECMSCP Focused Conservation Areas (FCAs). As discussed in GR-2, the current land use designations on the FCI lands GPA allow for higher densities than the proposed Project. Also, Figures 2.4-2A and 2.4-2B have been amended to show in-progress ECMSCP FCAs and the estimated impact to vegetation. In addition, Table 2.4-3 has been added to the SEIR to identify the number of parcels and acreage for areas with further subdivision potential, as compared to parcels with no subdivision potential. As shown in this table, a total of 1,631 parcels (41,371 acres) within the Project areas are located within PAMA (SCMSCP or Draft NCMSCP) and FCA (in-process ECMSCP); however, only 67 parcels (12,547 acres) have additional subdivision potential. The table further shows that the parcels with additional subdivision potential would result in a potential level of impact ranging from 6.3% to 25.0%. As discussed above, the 25% level of impact reflects areas proposed for a RL-20 designation (one dwelling unit per 20 acres), the 12.5% level a RL-40 designation (one dwelling unit per 40 areas) and the 6.3% level a RL-80 designation (one dwelling unit per 80 acres). Therefore, only four parcels (836 acres) within the Project areas located within PAMA (SCMSCP or Draft NCMSCP) and FCA (in-process ECMSCP) would both be able to subdivide and have a higher density (RL-20) than the one dwelling unit per 40 acres analyzed in the 2011 General Plan FEIR.

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		<p>SEIR subsection 2.4.4.2 determined that the impacts from the Project to riparian habitat and other sensitive communities would be minimized by implementation of mitigation measures, but would remain significant and unavoidable. Likewise, SEIR subsection 2.4.4.4 determined that the impacts from the Project to wildlife corridors would also be significant and unavoidable. However, SEIR subsection 2.4.4.3 determined that impacts to federally-protected wetlands would be reduced to below a level of significance with implementation of applicable General Plan Policies and mitigation measures.</p> <p>See also Response to Comment O-6. The additional information is presented to address the comment's concern that the analysis was not sufficient to reveal potential impacts. However, the information above and provided in the referenced tables has not change the significance of identified potential impacts nor caused the creation of additional mitigation.</p>
O-8	<p>We are also concerned with project-related increases in densities that would occur adjacent to lands that have been conserved for MSCP or other biological purposes. According to the SEIR, "w[h]ile the General Plan EIR did not evaluate or consider the impact of adopting the General Plan land use element on the former FCI lands, it was prepared as a Program EIR." Therefore, the SCMSCP consistency analysis provided in the General Plan EIR evaluated FCI lands at a density of one dwelling per 40 acres, whereas the current SEIR appears to include some changes to the development densities within and adjacent to select SCMSCP open space and PAMA cases compared to the prior General Plan EIR. In areas where increased development is now proposed, it can potentially add strain on open space and conserved lands through direct and indirect impacts associated with various edge effects, including recreation use, trespass, and illegal dumping, and additional land management actions among other constraints.</p>	<p>The County appreciates the concerns expressed in this comment. Draft SEIR Figures 2.4-2A and 2.4-2B have been modified to show conserved lands. In addition, Table 2.4-4 has been added to the SEIR to identify the number and acreage of parcels that are adjacent to conserved lands, including Cleveland National Forest lands. This table segregates parcels that would allow subdivision from those where there is no further subdivision potential, based on the proposed land use designation. As shown in this table, there are 523 parcels (10,364 acres) within the Project areas that are located adjacent to conserved lands; however, only 35 parcels (2,628 acres) have additional subdivision potential. Table 2.4-4 further shows that these parcels with additional subdivision potential would result in a potential level of impact ranging from 6.3% to 100%. As discussed above, the 12.5% level of impact reflects areas proposed for a RL-40 designation and the 6.3% level a RL-80 designation. Therefore, only 22 parcels (298 acres) within the Project area are adjacent to conserved lands that would both be able to subdivide and would have a higher density than the one dwelling unit per 40 acres analyzed in the 2011 General Plan FEIR.</p> <p>The comment correctly identifies the difference between analysis of the 2011 General Plan EIR and the FCI Lands GPA SEIR; the proposed Project</p>

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		<p>alternatives of the respective CEQA analysis do differ, hence the FCI SEIR supplements the information of the 2011 General Plan EIR to ensure the specifics of the FCI Lands GPA proposed Project is adequately analyzed. The potential for direct and indirect effects associated with 'edge effects' is analyzed within SEIR subsection 2.4.3.2 regarding riparian and other sensitive natural communities. Subsection 2.4.4.1 discusses how the General Plan land use policies and conservation policies address the potential impacts to biological resources caused by edge effects; mitigation measure Bio 1.7 specifically addresses potential impacts to biological resources caused by edge effects.</p>
O-9	<p>The final SEIR should clearly identify where the proposed project would change land use density or designations (either increase or decrease) within the adopted SCMSCP PAMA, draft NCMSCP PAMA, in-progress ECMSCP FCA and where it would occur adjacent to lands that have been conserved for MSCP or other biological purposes.</p>	<p>As discussed in Responses to Comments O-7 and O-8, SEIR Figures 2.4-2A and 2.4-2B identify estimated levels of impact to vegetation. A 12.5% impact level category has been added to these figures to more clearly show areas with a RL-40 or lower designation. Therefore, all areas with a 25% or higher level of impact would have a higher land use intensity than the RL-40 designation analyzed under the 2011 General Plan EIR. In addition, as discussed in Responses to Comments O-07 and O-08, SEIR Tables 2.4-3 and 2.4-4 have been added to further distinguish the number of parcels and acreage within the Project areas without additional subdivision potential, based on the land use designation. However, the existing densities analyzed in the Draft SEIR reflect the land use designations of the previous General Plan (1978) in effect before the FCI was enacted (see Global Response 2 (GR-2)). Current land use designations are reflected by the No Project alternative and are shown on SEIR Figures 4-3.1 through 4-3.13. SEIR Table 4-2 provides a comparison of land use distribution in acres showing that existing land use designations are predominately Semi-rural Residential (67,868 of 71,715 acres), as compared to the proposed Project, which is predominately designated Rural Lands (60,544 of 71,715 acres). The additional detail however, does not represent new information that would result in new or substantially increased significant impacts. This information further clarifies the existing analysis. The SEIR concluded that impacts from the Project to riparian habitat and other sensitive communities would be minimized by implementation of mitigation measures, but would remain significant and unavoidable (SEIR</p>

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		subsection 2.4.4.2); impacts from the Project to wildlife corridors would also be significant and unavoidable (SEIR subsection 2.4.4.4); and impacts from the Project to federally-protected wetlands would be reduced to below a level of significance with implementation of applicable General Plan Policies and mitigation measures (SEIR subsection 2.4.4.3).
O-10	Figure 2.4-A depicts the boundaries of the adopted SCMSCP SAP planning area, draft NCMSCP, and in-progress ECMSCP plan areas in relationship to the FCI lands. However, this figure does not depict the locations of PAMA, Biological Resource Core Areas and designated wildlife corridors and linkage areas defined within the adopted SCMSCP.	Figures 2.5-1 through 2.5-13 have been added to the Final SEIR to show the information provided in Figures 2.4-2A and 2.4-2B in greater detail. In addition, these new figures also show the locations of Biological Resource Core areas, designated wildlife corridors and linkage areas, as well as PAMA. The additional detail however, does not represent new information that would change the results of the analysis which concluded that impacts from the Project to riparian habitat and other sensitive communities would be minimized by implementation of mitigation measures, but would remain significant and unavoidable (SEIR subsection 2.4.4.2); impacts from the Project to wildlife corridors would also be significant and unavoidable (SEIR subsection 2.4.4.4); impacts from the Project to federally-protected wetlands would be reduced to below a level of significance with implementation of applicable General Plan Policies and mitigation measures (SEIR subsection 2.4.4.3). Further, there is no need to require additional mitigation because the refined detail does not lead to new information that would change the significance or severity of the impacts than was previously identified and disclosed in the Draft SEIR, Section 2.4, subsections 2.4.3.1 through 2.4.3.6 and 2.4.4.1 through 2.4.4.6.
O-11	Additionally, the Department requests that the smaller-scale maps (e.g. Figure 1-2A and Figure 1-28) provide a similar comprehensive approach.	Refer to Response to Comment O-10.
O-12	The final SEIR should include the above MSCPrelated information on Figure 2.4-A to support the analysis of where and to what degree the proposed FCI GPA changes to land use density (especially increases) would result in direct or indirect impacts in the existing SCMSCP, draft NCMSCP, in-progress ECMSCP and to lands that have been conserved for MSCP or other biological purposes (see comment No. 1).	Refer to Response to Comment O-9, which discusses how Figures 2.4-2A and 2.4-2B have been amended to show an additional impact category to distinguish Project areas with higher intensity land uses than the RL-40 designation analyzed by the 2011 General Plan EIR. Refer also, to Response to Comment O-7 that discusses SEIR Table 2.4-3, which shows that only four parcels (836 acres) within the Project areas located within PAMA (SCMSCP or Draft NCMSCP) and FCA (in-process ECMSCP) would

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		<p>both be able to subdivide and have a higher density (RL-20) than the one dwelling unit per 40 acres analyzed in the 2011 General Plan FEIR. However, plans and regulations of draft documents cannot be specifically evaluated for potential impacts to implementation as they have not been adopted and do not have official status. The mitigation and polices that are proposed to address potential impacts of projects on adopted plans and regulations can be found within SEIR subsections 2.4.4.1 through 2.4.4.6.</p>
O-13	<p>In response to our request to identify the ongoing NCMSP and ECMSP planning efforts, the SEIR references the October 29, 2008 Planning Agreement (PA) which establishes a process to review interim development within the planning areas to achieve the preliminary conservation objectives and preserve options for establishing a viable reserve system or equivalent long-term conservation measures. The October 29, 2008 PA described in the draft SEIR expired and was renewed on May 16, 2014. The final SEIR should use the latest 2014 reference when discussing the NSCMSCP and ECMSCP PA.</p>	<p>As a result of this comment, the last paragraph of Draft SEIR Section 2.4.3.4, Wildlife Movement Corridors and Nursery Sites, has been revised to reflect the correct date of the Planning Agreement and to clarify the extent of the South County MSCP, as follows:</p> <p style="padding-left: 40px;">The proposed Project's direct, indirect and cumulative impacts would be reduced by the same regulations, implementation programs (2011 General Plan goals/policies) and mitigation measures from the General Plan Update PEIR and repeated in Section 2.4.4.4 below. However, implementation of the mitigation measures listed in Section 2.4.4.4 would not reduce these impacts to below a level of significance. <u>Implementation of the SCMSCP, County of San Diego</u> While the direct and cumulative impacts within the South County MSCP will be mitigated below a level of significance through implementation of the Subarea Plan and the Biological Mitigation Ordinance will provide for mitigation of the direct and cumulative impacts within the Subarea Plan area (southwestern portion of the county). For the northwestern and eastern portions of the county, the North County and East County MSCP Plans have <u>are</u> not yet been adopted. As such, any contribution to the cumulative loss of wildlife corridors in the draft North and East County Plan areas would be cumulatively considerable, even after mitigation has been implemented for individual projects. It should be noted; however, that an interim North and East County MSCP Planning Agreement (dated October 29, 2008 <u>May 16, 2014</u>) is in place between the County, the CDFW, and the USFWS. Among other things, this agreement establishes a</p>

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		<p>process to review interim development within the Planning Areas that will help achieve the preliminary conservation objectives and preserve options for establishing a viable reserve system or equivalent long-term conservation measures, but until those MSCP Plans are completed and approved, the proposed Project would result in significant and unavoidable direct, indirect and cumulative impacts on wildlife corridors and nursery sites.</p> <p>This correction does not alter the results of the impact analysis nor identify the need for new or additional mitigation.</p>
O-14	We appreciate the opportunity to comment on the SEIR for the Proposed Project and to assist the County in further minimizing and mitigating project impacts to biological resources.	The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
O-15	The Department requests an opportunity to review and comment on any response that the County has to our comments and to receive notification to the forthcoming hearing date for this project (CEQA Guideline; §15073[e]).	The Draft Response to Comments from this letter will be provided to the California Department of Fish and Wildlife at least 10 days prior to certification of the SEIR, consistent with CEQA Guideline 15088 (b). The comment references CEQA Guideline 15073 (e) which pertains to the lead agency providing notice to public agencies that comment on a Negative Declaration or mitigated negative declaration of public hearings for the project. The document for which this comment was provided is an SEIR, not a negative or mitigated negative declaration; the cite is in error and does not apply to this circumstance. Also, Mr. Weiss's name has been added to the Project's outreach list for notification prior to Planning Commission and Board of Supervisor hearings.

	Comment	Response to Comment
P-1	Thank you for the opportunity to comment on the County SEIR amendment addressing Forest Conservation Initiative lands.	This comment is an introduction to comments that follow. This comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision makers in evaluating the project.
P-2	The greater US Forest boundary which contains inholdings, is critical for the health of the forest which in turn is critical to the plants, animals, and health of the entire community of San Diegans.	The County of San Diego acknowledges and appreciates the comment. The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
P-3	Lands in the US Forest as well as actions that would impact the forest fall under the National Environmental Policy Act, (NEPA) as well as those private inholdings that additionally fall under the California Environmental Quality Act, (CEQA). These environmental laws require project planers to "take a hard look" at the information to make an informed decision.	The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
P-4	The county is required to base its decision using criteria from a viable climate action plan; but the county does not currently have a climate action plan in place.	The County does not agree with this comment that the decision for the Project cannot be made without a Climate Action Plan (CAP) in place. SEIR Section 2.15.3.2 provides the guidelines for determining significance for the purposes of evaluating the proposed Project for the County Board of Supervisors to use as a basis for decision making. Please see Global Response 3 (GR-3). The CAP is a program that establishes policies and quantifiable implementation measures to reduce local GHG emissions, improve air quality, and enhance livability, sustainability and resiliency. Once adopted, the County will implement the policies and measures contained in the CAP. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
P-5	I would like to present the following points taking these issues into consideration: Because this is a US Forest Service boundary and this action applies to activities within that boundary; decisions there do	This comment appears to be a comment on the merits of the project but does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. It will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.

	not represent a weighted consideration upon community action; but must necessarily represent an action to preserve and protect the last remaining wild expanses of undisturbed <i>forest</i> that we have.	
P-6	The most critical place where this action must focus its efforts, is not at the center of a wilderness, miles into the interior; but <i>at</i> the forest boundary. Protection <i>must start</i> there if we are to insure that the wilderness within does not fall to more splintering and sprawl.	The comment advocates for “protection” at the forest boundary. The comment does not raise any issues concerning the sufficiency of the Draft SEIR’s analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
P-7	Currently the County does not have Climate Action Plan criteria upon which to gage their determination. This is a crucial factor. In 1993 the FCI was first established with overwhelming voter support. During the subsequent twenty-three <i>successful</i> years of operation, consideration of climate stabilization criteria has become both critical and required. Nevertheless the County has not incorporated this requirement into their decision.	This comment asserts that the “County does not have Climate Action Plan criteria” to make a determination on the Project. Refer to Response to Comment P-4, and Global Response 3 (GR-3).
P-8	In reviewing the video from the June 25, 2014 San Diego Board of Supervisors meeting we observed considerable meaningful testimony about the crucial role our forest plays in “providing a safe haven for species diversity, wilderness, solitude, <i>primitive</i> recreation, species refuge, and preserving the wild character of these lands.” Specifically we observe very clear testimony from the US Forest Supervisor, William Metz, about these items and the critical role they additionally play in lands designated and recommended for full Congressional Wilderness status. Supervisor Metz specifically points out, that further subdividing these inholdings in the forest “puts the full viability of these wild and wilderness lands in jeopardy.” I agree as did the overwhelming majority of voters in 1993.	The comment, which discusses public testimony at the June 2014 Board of Supervisor’s hearing on this project, does not raise any issues concerning the sufficiency of the Draft SEIR’s analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
P-9	The community observed considerable testimony as to the value in limiting the urban to wild interface in its role in fire starts and the increased risk as well as expense, to life and	The County agrees with this comment concerning the testimony at the June 2014 Board of Supervisors hearing. The comment does not raise any issues concerning the sufficiency of the Draft SEIR’s

	property in placing more humans in these areas.	analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
P-10	I emphasis as many others have the critical role our forests play in the health of the community, their role in the integrity of our watersheds, and the ecology of the lands, and in the stabilization of our climate, a goal required by state and federal law.	The comment, concerning the role a forest plays in the health of a community, does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
P-11	While NEPA requires a decision maker to take a hard look at the issues considering and disclosing all relevant information; when I review the live testimony on the Central Mountain areas by out Forest Supervisor, Mr. Metz literally did not make it back to his chair before a motion was on the floor to return the status of the CU-1 areas to RL40.	This comment is referring to an area in the Cuyamaca Sponsor Group Area (SGA) shown on Draft SEIR Figure 1-4 where, on June 25, 2014, the Board of Supervisors endorsed the Planning Commission recommendation (proposed Project and Alpine Alternative Land Use Map alternative) for combined RL-40 and RL-80 designation (one dwelling unit per 40 and 80 acres, respectively), which is either the same (RL-40) or a lower (RL-80) than the density allowed for this area under the Forest Conservation Initiative. However, the Mid-density and Modified FCI Condition alternatives propose for a RL-80 designation (one dwelling unit per 80 acres). The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis under CEQA. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
P-12	There followed a blissful attempt to have us believe that these areas were less remote and critical than the RL-80 designations to the immediate south. I beg to differ.	Refer to Response to Comment P-11. The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis, but instead offers the commenter's opinion concerning the merits of the project. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
P-13	While the county has not field checked these areas, I have, over the last twenty years both for myself and for numerous successful projects while representing the San Diego Sierra Club. This includes our support for the recent unprecedented decision to establish over 30,000 acres in recommended wilderness status. In this capacity I and consequently the	Refer to Response to Comment P-11. The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.

	Sierra Club San Diego has enjoyed one of the rare few, if not the most thorough field presences in the last two decades in these remaining remote, unspoiled corners of the Cleveland, photographing and videoing in these recommended wilderness areas, visiting them every month if not almost weekly. I support Mr. Metz's decision as one of the most courageous and even noted by Ryan Henson of CalWild, as one of the most unprecedented land mark wilderness decisions nationwide, for the sustained future of our wild lands in this region.	
P-14	This particular section of the forest, the county labels Central Mountain, laying adjacent to over 30,000 acres of recommended wilderness, within the boundary of the Cleveland National Forest, is one of the most critical, remote, least inhabited, and most threatened, of the entire forest, most sensitive to water issues as well as the most biodiverse. In fact it may well be the most uniquely biodiverse region in the county. Indeed the Kumeyaay word "Cuyamaca" means <i>"where the water comes from"</i> .	This comment is referring to the Project areas shown on DRAFT SEIR Figure 1-3. The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
P-15	Clearly the apparent dismissal at the end of testimony for this area, was uncommon for this body as we have seen incredible and much appreciated support in the past. Just last spring Supervisor Jacob put a stop and facilitated a miraculous turnaround to severely damaging dirt dumping practices in the same area. Within two weeks four years and thousands of cubic yards of dirt washing into the watershed was finally halted on a proverbial dime thanks to her attentiveness to the issues.	The comment, which is again discussing occurrences at the June 25, 2014 hearing (refer to Response to P-11), does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Refer also to Response to Comment P-14.
P-16	Unfortunately this time by contrast, the reaction at the supervisor's meeting was shockingly devoid of the NEPA "hard look" at these issues, as well as general thoughtfulness to our Forest Supervisor's testimony. Obviously there could not have been time to even consider the very clear facts that were just presented by the Forest Supervisor himself in that meeting, over the validity of the emotional testimony of the	This comment, which is referring to testimony by property owners or their representatives of lands within the Central Mountain/Cuyamaca SGA, does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.

	land holders. They did not have time to verify the relationship of these speakers to the property as stated, moreover, while the only person in residence in the McCoy CU-1 section for the last decade and most in a thoughtful position to speak about these lands and 150 year history, was not present. Why did the other family members not ensure his testimony? Were they afraid that the one member that has known and cultivated a relationship with the land and 150 year history around him may want to see that legacy remain intact?	
P-17	I don't know but I see no clear reason or verification that this has been given sufficient review or consideration. Everyone wants a clear, easy, and final, swift answer. This is none of these. This one requires insight beyond math, physics, and economics of a physical world to at least some reasonable depth at the human ecumenical condition, courage, objectivity and foresight, -not selfishness.	<p>The County does not agree that the area has not received sufficient review for the Board of Supervisors to make an informed decision. The Board has the analysis included in the SEIR to consider before making a final decision for the land use map for the Cuyamaca area. SEIR Chapter 1, Section 1.5.1 provides the Project area environmental setting and concludes the baseline conditions for the proposed Project are the same as those discussed in the General Plan Update PEIR. In addition, potential environmental effects are provided for resources identified in SEIR Section 1.1.3. Using one of these resources as an example, Section 2.4, Biology identifies the estimated impacts to vegetation (Figures 2.4-2A & B) and wetland impacts (Table 2.4-2 and Figures 2.4-3A & B). Also, SEIR Chapter 4 compares the impacts of each Project alternative to the proposed Project. Tables are included to compare these alternatives, such as Tables 4-1 Environmental Impacts; 4-2 and 4-3 Land Use Distribution in Acres; 4-4 Dwelling Units at Buildout; 4-5 Dwelling Units within Palomar and Mount Laguna Observatory Zone A at Buildout; 4-6 County Identified Agricultural Lands and Impact Estimates; 4-7 Proposed Land Uses in Forest Resources; 4-8 Area-Wide and Mobile Source Emissions Alternatives Comparison; 4-9 Biological Resources Impacts Comparison; 4-10 Proposed Land Use within Flood Areas; 4-11 Proposed Land Uses in Designated MRZ Area; and 4-12 Community-Level Forecast Average Daily Traffic (ADT) Generation.</p> <p>On June 25, 2014, the Board considered the land use map for the Project area lands within the Central Mountain Subregion, including</p>

		<p>the Cuyamaca Community Sponsor Group area. The Board-endorsed land use designations that were incorporated as part of the proposed Project land use map. At that hearing, the Board was provided with a staff report containing analysis of this area, along with public testimony from stakeholders. This analysis, identified as CU-1 in Attachment C to the staff report for the June 25, 2015 Board hearing is available on the Project web site at the address below. This staff report is included as part of the administrative report for this project. http://www.sandiegocounty.gov/content/dam/sdc/dplu/advance/docs/FCL/bos/c.cu1analysis.pdf</p>
P-18	<p>I diverge for a moment to say what should have been said long ago.</p> <p>Could the remaining heir and resident and his trusted colleagues living in the area, his wisdom and depth in understanding the components from the day by day facing them extend well beyond dollars and physical infrastructure? In my opinion, clearly and absolutely. From a 12 year history knowing him, Robert McCoy, his insight has been heartwarming, and enlightening, if not shockingly on point. He and his late and wonderful brother, David do not define life in terms that we could fully understand but to our historical record of our local society, they are invaluable and intrinsic. When I have looked at them and assured them that they are indeed the most important people in the forest, they looked back in humble, almost suspicious disbelief. But I've been there more than most and I can state categorically they are, and were. If nothing else they could use some time and elbow room. Not this outside malarkey, a contrived part of a contrived world reaching at them from down town, thrust upon theirs, living just next door to one of the most <i>UN-contrived</i> places in all of Southern California. They are disrespected via ignorance alone, so ignorant we think we are the ones in the know, in being pulled into a question using variables that were defined solely by the aggressor. We could only hope to speak their language. We have the same</p>	<p>The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.</p>

	words; but I can assure you, we can't. Not only is the answers demanded where and when, not wanted nor appreciated, not even relevant to this remote world, I suspect there is no love for even defining this world by the <i>question</i> on outsider terms. Their genuiness and generousness did not recognize boundaries at all until recently, necessarily required to do so, with the sudden onslaught of hundreds of visitors into the area without warning or understanding.	
P-19	I feel for what the truly legacy old timers, tied too closely to the stereotype of "Duck Dynasty's" , Si Robinson, Si, himself a victim of the same in another part of the country, and with a heart and depth underneath, of William Faulkner for what truly matters when rarely allowed, without bias, to express themselves, what they have had to reconcile with the thousands descending upon a waterfall recently and discovering natural beauty for the first time. What a paradox! You cannot address this question fairly or accurately until you take the time, diligence and courage, if not your own vulnerability lain upon the ground before you, to understand its components. No one in government is doing this, but to date I have my bets that when and if it comes; it will be the diligence of individuals within the USFS that go the distance. In many, many ways our legacy locals from the McCoy Ranch have been far more patient with the rest of us over the years, and more patient than many of us in the middle have been with the masses, suddenly showing up at their door step, far more respectful for far longer than clearly we have been with prejudging and demanding of them. They are far set apart than the average land investor, or even the modern guy, well meaning, and wanting to get a little piece of land away from it all. They ARE history in the live, and one of the last remaining links we have to an accurate view of the past. Careful what you seek... In my opinion the best you could do is suspend the question permanently for the foreseeable future and leave them alone. We gain volumes in the long	This comment is a personal assessment of property within an area referred to as CU-1 which is within the proposed Project areas, and does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.

	run. They are a long lost treasure.	
P-20	We look in horror at the legacy of our past upon the Native American Indian but then we fail to see our last remaining legacy ranches for the living history that remains and become as despicable in assuming we know beyond our old timers today as we were in severing all ties to the Native wisdom of the past. WE are the real losers in lost knowledge, in perpetuity, for it. We have so fallen out of scale in seeing this phenomenon for what it is and for what it represents it is mind blowing. The human condition is its own worst enemy once again. It's not too late to reconsider. This is a place where the question itself needs some very serious realigning, it is way too presumptuous in the context of this geographical apex.	The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
P-21	To assume and proclaim on a dime without inspection or some time there, that it is the lessor end of the Central Mountain section you define, is almost shocking. This IS the CENTRAL Mountain, it is THE apex of the San Diego backcountry physically <i>and ecumenically</i> . It lies geographically in the center nestled up under Cuyamaca the 2nd highest mountain in the county escaping the top honors at Hot Springs by only 60 feet; but clearly far more known every day from every sky line in the county. I feel for the people but I feel even more for the endurance of the integrity of the land. We should think long and hard, and carefully, before we decide we should, or are even entitled, to divide and conquer. After all we only dished up two deserts: subdivide by 40 or 80? What if we don't want desert?	<p>The County appreciates the environmental significance of the lands within the Cuyamaca Sponsor Group Area and adjacent Central Mountain Subregion. As shown on SEIR Figures 1-3 and 1-4, in recognition of these remote lands, the proposed Project assigns Rural Lands land use designations of either RL-40 (one dwelling unit per 40 acres) or RL-80 (one dwelling unit per 80 acres), which allow the lowest potential development available for privately-owned lands. Table 1-1C has been added to SEIR Section 1.2.1 to show the potential number of new lots that would result under both the existing land use designations (No Project alternative) and the proposed Project designations. As shown in this Table, the proposed Project would substantially reduce the number of potential new lots, when compared to the existing land use designations. Below is a summary showing the potential number of new lots from Table 1-1C for Cuyamaca and Central Mountain.</p> <ul style="list-style-type: none"> • Cuyamaca – 28 (proposed Project) and 210 (No Project alternative) • Central Mountain – 12 (proposed Project) and 1,034 (No Project alternative) <p>While Table 1-1C provides additional details regarding the proposed land use designations, the information does not change the impact</p>

		determinations or require additional mitigation.
P-22	<p>What is the answer? I'm not sure; but I am sure we did not take a "hard look" and we do not have a good one yet. The numbers attempting to descend and force action by their own terms often even without checking in with the US Forest Service, here for any number of projects, is shocking; and the manner in which they attempted to do it, appalling. I've watched them all every step of it. Thanks to our Forest Supervisor it still has a chance to be spared heart break. But sorry, not the family members you saw give testimony, not the county, not even I, nor the Forest Service has the answers; but I think the latter two has at least acknowledged that much that we need to provide this particular corner a lot more grace and time until WE mature to a point that we act appropriately.</p>	<p>The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.</p>
P-23	<p>You have not begun to try to understand this area and that is what I object to more than anything. Because a place is not forest it suddenly becomes your jurisdiction and you suddenly know everything. You don't. When the residence of the Central Mountain area needed medical care who came, the County? Nope. It was members who cared and acted withing the US Forest Service. Who is at least paying attention? It wasn't the county. I caught red handed the county trying to turn the whole region into a giant wind farm and worse I caught them trying to NOT tell the Forest Supervisor. That alone gives me great pause about the county credentials to be making decisions here. I caught the county roads lying about their dirt dumping and storage and grading practices, --all too easily proven in the internet era with Google Earth's history function.</p>	<p>This comment calls to question the County's capacity to appropriately evaluate this area but does not present information that was not analyzed, considered and used in developing the proposed Project or Project alternatives. The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.</p>
P-24	<p>Again, I do appreciate that there are a few like Ms. Jacobs that step up and mean well, but the integration to the county government as a whole and my faith in them to take the extra mile for the intrinsic and ecumenically "San Diego" for perpetuity, is just not there, yet. This is within the bounds of</p>	<p>The comment suggests the County work together with the U.S. Forest Service (USFS). The County has coordinated with USFS staff throughout the entire planning process for this Project. Examples of this coordination are provided below.</p> <ul style="list-style-type: none"> • County staff met with or participated in conference calls with

	the US Forest Service and that interface needs to demonstrate far more agility in working together.	<p>USFS staff in September 2012, September 2013 and August 2015.</p> <ul style="list-style-type: none"> USFS staff provided comments on the SEIR Notice of Preparation in September 2012 and then on the 2013 Draft SEIR in March 2013. These comments were considered by County staff when developing the staff recommendation to both the Planning Commission in October 2013 and Board of Supervisors in June 2014. USFS staff sent a letter to the County Board of Supervisors prior to the June 2014 hearing.
P-25	I think we should impose nothing until we think about what we could lose for a lack of not getting out of our own way and that impact to all of time to come and to losing all of time that has come. This is, at its core a philosophical question. –and those can be messy until clarity is at last earned and achieved. It will come, but it takes time and we should not destroy all in the process.	The comment does not raise any issues concerning the sufficiency of the Draft SEIR’s analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
P-26	That would go as well for other pressures upon that living legacy that merely want to demand their right to divide it up for profit. I cannot stand in the shoes of one that has ties so clearly to what I’ve read only in history books; but I have spent enough time in and around the area to know that we have not accurately defined this situation and a rash decision on things we don’t understand would separate us from valuable truths from the past forever at the demise of our own ignorance and arrogance to think we know it all without ever going there, much less living it.	The County does not agree with this comment, which asserts that the issues in this area have not been sufficiently defined. Refer to Response to Comment P-17. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
P-27	I’m afraid to admit it but I will. I would not divide these properties at all. They are a living history. That perspective crumbles the moment it is divided --Compensate the losses of those that must have their family share and be done with it. We created this situation a hundred years ago and that much still comes at a huge bargain for the rest of us. If we are to evolve appropriately we must do that much. Pay the trust their gold but leave the legacy alone. It is a drop in the	<p>This comment advocates for compensating property owners in exchange for their ability to subdivide their property. A similar program for agricultural lands is already in place—see Purchase of Agricultural Conservation Easements Program at: http://www.sandiegocounty.gov/content/sdc/pds/advance/PACE.html</p> <p>The comment does not raise any issues concerning the sufficiency of the Draft SEIR’s analysis. The comment will be included in the</p>

	bucket compared to the resource and the cost of losing it.	administrative record that will be considered by the decision-makers in evaluating the Project.
P-28	We certainly have for good reason to the American Indian, why would these not carry a similar responsibility? Accommodate the family ability to be there, generationally; but to remove it without acknowledging its place both historically and environmentally would be a big mistake.	The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
P-29	At the end of the day, that is what subdividing does, does it not? I know it; you know it, and at least some of our living legacy knows it, those that think in deep and broad terms about the land and its connections, all too painfully well. Some in these families know exactly what I mean, some won't.	The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
P-30	So don't subdivide at all , it was our mistake as a society in allowing without insight in the first place, but do compensate the fringe on the trust; and be done with it and let the land live on.	This comment advocates the County compensate property owners for a loss in their ability to subdivide their property. Refer to Response to Comment P-27. The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
P-31	These are difficult questions but those in residence do not gaff off the sanctity of the natural history over their living conditions. They've given up plenty in the modern world to ensure the integrity of their birthright. They deserve recognition and acknowledgment certainly at least by contrived modern day planners. Forcing the divide and conquer plan is hardly fair. This needs something else; yet so far, no one has a good idea. That does not mean replace no plan with a bad one. IN the interim, leave it alone. Their depth if one actually takes the time to listen rivals William Faulkner. Their focus is a totally different league of banking where their sense of currency lies well outside the nuts and bolts of this decision trust upon them by an outside modern government.	The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.

	These ranches were in place before California was even a state, nor were there local or state taxes demanded of them to pay for things they never asked for, but little by little the land shrivels for thrusting monetary tribute in property taxes upon them.	
P-32	I doubt seriously they had the benefit of fair accounting or effective legal counsel in the process. It is something to consider many times over.	The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
P-33	If it weren't for their hanging on, rich in beauty, poor in dollars, for being one of the few to discern and choose the difference accordingly, our back country would be a series of tasteless, emotionless, type converted grasslands, timeshares, and industrial energy projects with freeways connecting them. Instead they are some of the richest in diversity and unspoiled beauty and habitat we have. However if you want a 'black and white' answer to the upper Central Mountain section I'll provide a hefty place to start...In my opinion this is in the direction of the right thing to do: My plan costs money; but that is all. It could be much worse and much more expensive.	This comment is an introduction to comments that follow. The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
P-34	I would entitle the entire 160 acre McCoy Ranch to Robert Allen McCoy, the last "real McCoy", so to speak, to manage in full and to designate in legacy as he defines. He is the one that selflessly understands it, lives and nurtures it, studies its history, savors it day by day and preserves its legacy and still finds ample love for his family to share and learn from its history. It was clear from the testimony of his brother the late David McCoy that his only desire and real intention in life was to share this beauty with his family. David was poor beyond comprehension in dollars but rich more than most San Diegans know in the beauty he knew every day from the "real" San Diego. That was the unrelenting and uncommon choice he made, as has his brother. They deserve the respect of the community for the respect they have given the land. I	This comment is in regard to an individual property owner and their affinity for the property discussed. The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.

	quote even Supervisor Jacob in her comment, “thanks to the McCoys for all they have given San Diego” at the last meeting on this issue.	
P-35	Dividing and conquering this apex of the geography and historical crossroads of the county is not going to preserve this dream. Therefore the solution is to NOT divide at all, keep the real and proven trustee of the land, Robert McCoy in the dream that is his birthright, then for the others on the trust, pay them the fair market share of their inheritance now without further talk of subdividing and be done with it. Provide the family with a continued ability to be present on the family ranch as their late father had wanted, without its subdivision within the forest boundary. The county created this controversy and pushed it upon the oldest ranch in the area, the county could pay and it would be a bargain to lay this to rest once and for all. Mr. McCoy is not going to disallow his family’s presence upon their family ranch; but he will and does treasure and recognize that legacy in its whole.	The comment asserts a solution to the dissolution of a family trust in order to prevent the property’s subdivision. The County does not agree that it “created this controversy and pushed it upon the oldest ranch in the area”. The proposed Project would retain the current density of one dwelling unit per 40 acres, the density allowed under the FCI. Therefore, there is no new or additional ability to subdivide the property under current or proposed conditions. The comment does not raise an issue concerning the sufficiency of the analysis in the SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
P-36	If it were possible I would include the full worth of the Green property, -- if Green could be adequately compensated, and rejoin to include all 300 acres of the original McCoy Ranch. That is the right thing to do, ecumenically. It is a unique situation underscores its existence before statehood. It deserves a thoughtful resolution, if possible without our barbaric intrusion further upon a private property and the county taking the responsibility to provide it. This solution endures the legacy and satisfies the financial woes of its inheritors, while preserving the integrity of its juxtaposition in the forest. That would answer once and for all the question of subdivision for this ranch and this issue.	See Response to Comment P-30. The comment does not raise any issues concerning the sufficiency of the Draft SEIR’s analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
P-37	The only other property in like kind to this issue is the Marston Ranch to the immediate north east of the McCoy Ranch, which should be granted similar solution if and when the time comes. However its owners are not the legacy locals that have the unique issues of the McCoy Ranch. The county,	See Response to Comment P-30. The comment does not raise any issues concerning the sufficiency of the Draft SEIR’s analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.

	essentially the public can pay for the course of history in putting things right. Otherwise we can spend another 20 years coming up with a better one that will be far more expensive in the long run. How much have we spent already on this? Fair? Much fairer than the debate before us now. It is a win-win. A similar solution should prevail for any other large legacy ranch inside the forest boundary. They should not be subdivided at all at the demise of forest and history; but their heirs should be compensated and allowed to have a presence on an undivided family owned parcel without further pawing at their property.	
P-38	Just what does intact mean from the outside looking in and where are our boundaries to intrude? We may not be in a position to answer but I think that clearly these variables need more time and they need to be put into the context of the bigger picture. That picture now includes required CAP criteria as well as a long long voter recognized validity of our National Forest Boundary and autonomy of the US Forest Service to manage its lands under NEPA.	The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
P-39	While we too cherish the living historical legacy of these hundred and fifty year old ranches I fail to grasp how that cherished living legacy 10 would be favored by subdividing and redevelopment over this historical living legend in its current juxtaposition to the Forest in keeping it whole. That rare living legacy, remains a valuable resource in of itself, and unique and precious living glimpse of the past, also threatened side by side with natural resources there and in the adjacent Federal Forest.	The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
P-40	Therefore I resolve that the County of San Diego: 1. MUST NOT evaluate the conditions of this region until they have legally acceptable Climate Action Plan criteria with which to do so. 2. Additionally these criteria must protect our Forest Wilderness and watershed as critical components of a valid climate action plan as well as critical to the health of the	The proposed Project and alternatives are evaluated for impacts to global climate change consistent with the significance criteria described in SEIR Section 2.15, specifically subsections 2.15.3.1 and 2.15.3.2. A Climate Action Plan is not necessary to evaluate and disclose potential impacts of the proposed Project and Project alternatives on global climate change. Refer to Global Response 3 (GR-3).

	forest ecology, and of our community.	
P-41	3. This decision should not be based on grandfathering old habits and political visibility; but on solid and scientific information that preserves our forests and the forest boundary in perpetuity.	The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
P-42	4. The county MUST respect the concerns of the US Forest Service in restricting further subdivisions, development, and management within the Cleveland National Forest, particularly next to wilderness, recommended wilderness, and anywhere within the US Forest greater boundary, where Forest resources, especially those protected by wilderness, such as water, habitat, critical species, critical and unique ecologies such as those in all of those the critical Central Mountain region, <i>quiet</i> untrammelled character and scenic integrity, could be compromised by more human activities such as a reduction in the protections by the FCI and <i>any OTHER</i> upcoming county proposals within the Forest Boundary.	The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
P-43	5. I would like to reference the concurrent comments by the Cleveland National Forest Foundation (CNFF) on this issue and recognize their suggestions to create a "forest" designator overlay district that would apply to all lands regardless of parcel size within the FCI planning area. I quote "New development can and should be accommodated inside the Village designated areas so that open space and forest land values can be preserved." I agree.	See Response to CNFF Comment T-6. The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
P-44	IN Conclusion: -Please do not accept less than the most environmentally stringent options for this effort. – Please DO respect the guidance of the US Forest Service within the greater Forest Boundary.	This comment provides concluding remarks. The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.

	Comment	Response to Comment
Q-1	The League of Women Voters supports principles of compact growth, enforcement of fire-safe development, and identifying and safeguarding valuable agricultural land, a limited but renewable resource. We promote conservation and preservation of critical natural resources, including habitat, open space and farmland. Our Land Use position supports minimizing urban sprawl and maintaining established patterns of growth and community identity within an area by allowing self-determination in community planning and decision making. We review major development projects which have regional impacts, including environmental analysis, for consistency with the comprehensive plan and regional infrastructure plan. Land use decisions should relate to and protect the overall quality of the environment while minimizing additional motor vehicle traffic.	This comment identifies the general planning principles supported by the commenter. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
Q-2	When the 2003 Cedar fire and the 2007 fires ravaged San Diego County, we knew that the back country would never be the same in our lifetime. Now, we are faced with another looming disaster—a man-made disaster. If the County allows increased density and leapfrog development in our last remaining wilderness area, then the diversity of wildlife in the county will be in jeopardy. Key wildlife corridors will be fragmented. At least 20 plant and animal species will be at risk of extinction.	<p>This comment expresses opposition to increased density and leapfrog development in the remaining wilderness areas. The County does not agree that the Project would allow increased density and leapfrog development in wilderness areas. The wilderness areas of the Cleveland National Forest are managed by the U.S. Forest Service, are outside the Project area and the County's land use authority and are not available for development.</p> <p>In addition, Table 1-1C has been added to the SEIR to compare, in addition to full buildout, the number of additional lots that could be created through subdivision of both the proposed Project and existing land use designations. As shown in this table, 2,470 additional lots could be created with buildout of the proposed Project, as compared to 11,287 net lots that could be created under existing land use designations. See also Global Response 2 (GR-2). The addition of this table does not change the analysis of the Draft SEIR, merely provides additional clarification of the development potential of the proposed Project when compared to existing land use designations.</p> <p>The comment provides the commenter's opinion about the impacts of the project and will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.</p>

Q-3	<p>We need zoning regulations that prevent a substantial increase in density. Based on our LWV principles, the proposed auto-based sprawl development consisting of thousands of new housing units in our national forest is unacceptable. Areas, such as Alpine, would suffer from inappropriate subdivision into residential estates rather than preserving its rural characteristics and qualities.</p>	<p>This comment expresses opposition to “proposed auto-based sprawl development” in the Alpine Community Planning Area (CPA). The County disagrees with the characterization in this comment as the proposed land use designations would expand an existing village and include an area allowing for mixed use development patterns. In addition, the proposed Project and alternatives do not include subdivisions within the Cleveland National Forest.</p> <p>As detailed in Section 2.1, Aesthetics, the construction of future buildings, infrastructure, or other improvements within the Project areas addressed in this SEIR would have the potential to adversely affect the unique character in some of the County’s CPAs and Subregions. As the types and character of these visual resources vary throughout the unincorporated County, some proposed land use designations would result in increased development densities in certain rural areas that could in turn adversely affect or degrade the existing visual character or quality of a community due to: incompatibility, substantial change to community character, or alteration or loss of a community’s visual resources. As such, implementation of the proposed Project would result in significant and unavoidable direct and cumulative impacts related to visual character or quality.</p> <p>The Board of Supervisors will consider this significant and unavoidable impact when considering whether to approve or deny the project. The project would also include a Statement of Overriding Considerations.</p> <p>The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.</p>
Q-4	<p>Please retain the integrity of the General Plan by preventing the subdivision of intact habitat, farmland and our watershed. These subdivisions would burden taxpayers with the costs of providing services and roads to distant areas while endangering more properties and citizens with limited water supplies, inevitable wildfires, and greenhouse gas emissions.</p>	<p>This comment expressed an opposition to the subdivision of intact habitat, farmland and watershed and new development that burdens taxpayers with the cost of providing services; however, does not propose alternative land use designations. As discussed in Response to Comment Q-2, the proposed Project would substantially reduce development potential when compared to existing land use designations. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of</p>

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		Supervisors will determine whether to approve the proposed Project or an alternative to the Project.
Q-5	Your draft SEIR identifies significant environmental impacts associated with wildfire hazards, biological resources, air quality, aesthetics, agricultural resources, traffic & transportation, hydrology & water quality, mineral resources, noise and utilities. These impacts concern us.	This comment recognizes that the Draft SEIR identified significant environmental impacts. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine the final land use designations for the Project.
Q-6	The League of Women Voters of San Diego County urges you to abide by the minimum 40-acre parcel limit established by the Forest Conservation Initiative, which two-thirds of the voters overwhelming passed over 20 years ago. Furthermore, please adhere to the principles and guidelines of the recently adopted General Plan and prevent auto-based sprawl. Please protect what remains of our Cleveland National Forest.	This comment urges the County to abide by the 40-acre minimum parcel size established by the Forest Conservation Initiative. The County disagrees with applying a blanket 40-acre minimum parcel size throughout the Project area. This was an alternative considered but rejected in the Draft SEIR, as discussed in Chapter 4, Section 4.1.1 Alternatives Considered but Rejected (pages 4-7 through 4-13) because applying a 1:40 development density over all of the former FCI lands would not be consistent with the Guiding Principles and Land Use Goals and Policies, including the Community Development Model. However, under the proposed Project over 43 percent of the Project area acreage is assigned a lower density (one dwelling unit per 80 acres) and over 35 percent the same density of the FCI (refer to the table on page 4-7 in Section SEIR 4.1.1). The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine the final land use designations for the Project.

R-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. We also appreciate the consideration given to our input by San Diego County Supervisors and staff throughout this process, including the designation of a Special Study Area in Eastern Alpine. The Forest's comments herein include comments previously submitted during the scoping period, as well as comments on both the initial and re-circulated Draft Supplemental Environmental Impact Reports (SEIRs).	The comment provides introductory statements. The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
R-2	Altogether, we remain 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 find that these impacts are neither adequately disclosed in the Draft SEIR nor consistent with the objectives of the County of San Diego General Plan.	The County does not agree that impacts were not adequately disclosed. SEIR subsection 2.2.4.4 determined that even with implementation of applicable General Plan policies and mitigation measures, any direct conversion of forestry resources due to private development of parcels within the Project areas would remain significant and unavoidable. In addition, SEIR Executive Summary Table S-2 provides a summary of all impacts and mitigation measures. As disclosed in the description of the No Project alternative of the SEIR Chapter 4, and analyzed in subsection 4.5, on December 31, 2010 the land use designations of the FCI lands (Project areas) reverted back to pre-Forest Conservation Initiative (FCI) General Plan designations (1978) in accordance with the language in the Initiative. Therefore, current permissible land use densities on FCI lands are higher than densities assigned in the proposed Project; the land use densities of the No Project alternative are higher than the densities in effect during the life of the FCI. The Project analyzed in the Draft SEIR did not use either the current densities (pre- FCI General Plan designations) or the densities of the FCI as a baseline. Rather, the Draft SEIR analyzed the impacts of the proposed Project in comparison to existing physical conditions. Please refer to Global Response 2 (GR-2).
R-3	Our review of the re-circulated Draft SEIR has revealed that no responses were provided to our comments on the initial Draft SEIR, nor did they result in changes to the analysis.	The comment noted the recirculated Draft SEIR does not contain responses to comments on the Draft SEIR circulated in 2013. Consistent with CEQA Guidelines section 15088.5(f)(1): "When an EIR is substantially revised and the entire document is recirculated, the lead agency may require reviewers to submit new comments and, in such cases, need

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		<p>not respond to those comments received during the earlier circulation period. The lead agency shall advise reviewers, either in the text of the revised EIR or by an attachment to the revised EIR, that although part of the administrative record, the previous comments do not require a written response in the final EIR, and that new comments must be submitted for the revised EIR. The lead agency need only respond to those comments submitted in response to the recirculated revised EIR.”</p> <p>The requirement to resubmit comments is addressed in the Recirculation Readers Guide in the first paragraph of the Summary of Revisions section. The Recirculation Readers Guide is available on the Project web site at: http://www.sandiegocounty.gov/content/dam/sdc/pds/advance/FCI2016/0.0%20Readers%20Guide.pdf</p> <p>Additionally, the Readers Guide immediately followed the Table of Contents and preceded the Executive Summary of the SEIR and further described within the Notice of Availability which provided notice to the general public, Responsible and Trustee Agencies as well as members of the public that had previously commented or requested specific notification.</p>
R-4	<p>It is also worth noting that the areas of the Cleveland National Forest proposed for recommended wilderness status at the time of our previous comments were granted this highest level of agency protection in October 2014.</p>	<p>The County appreciates the information that the areas noted as recommended for Wilderness status in the 2013 USFS comments have been granted this status. The Wilderness status information was included in staff’s analysis to both the Planning Commission and Board of Supervisors when developing the proposed Project land use map and the Mid-density and Modified FCI Condition alternatives and are therefore represented as part of the existing environmental conditions (baseline conditions) from which the proposed Project was analyzed.</p> <p>The planning reports to the Planning Commission and Board of Supervisor are included in the Administrative Record for the Project. In addition, this comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.</p>

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R-5	We find that the best way to protect both the environment and public health and safety in the vicinity of the FCI lands, including the Cleveland National Forest, would be to select the Environmentally Superior Modified FCI Condition Alternative.	The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis, but provides the commenter's opinion and preference for the Modified FCI alternative. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
R-6	In addition, we request provisions that development on private lands will not rely on the Cleveland National Forest for infrastructure or vegetation management needs and that impacts to the Cleveland National Forest from such development will be avoided, minimized, or mitigated.	The comment "request(s) provisions that development on private lands will not rely on the Cleveland National Forest (CNF) for infrastructure or vegetation management needs". The ability to permit infrastructure installation or vegetation management activities on CNF Lands managed by the U.S. Forest Service (USFS) is wholly within the discretion of the USFS and not the County of San Diego. See Global Response 5 (GR-5).
R-7	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.	This comment is an introduction to comments that follow. Comments R7 through R24 generally describe the issues that USFS manages and the general direct and indirect effects of population growth adjacent to USFS-managed lands. These comments do not specifically refer to the DEIR or the substantive analysis contained within it. It should be noted that, generally, the proposed Project would not result in an increase in population adjacent to USFS-managed lands. Even if the Project were not to be approved as proposed, FCI lands would still be able to be developed by property owners under the existing General Plan designations, and these types of effects may have the potential to occur. However, the proposed Project sets forth a programmatic framework compatible with the 2011 General Plan Update that future discretionary projects shall be required to comply with. The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
R-8	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.	The comment, which identifies USFS challenges when managing the CNF, does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.

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R-9	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.	The County appreciates the comment that increased development within the Wildland/Urban Interface puts increased pressure on USFS managers. Draft SEIR subsection 2.6.3.7 identifies the Project area acreage within the Wildland Urban Interface and determined that 86% of those lands are assigned Rural Lands designations. The Draft SEIR determined the proposed Project would result in significant and unavoidable direct and cumulative impacts related to wildland fires. The proposed Project would not increase homes within the WUI when compared to existing General Plan designations. Lower densities are proposed for assignment in the proposed Project and the Project alternatives as compared to existing land use designations (No Project alternative).
R-10	Finally, we have concerns about the potential difficulty of evacuating people from remote subdivisions when wildland fires occur nearby on the Cleveland National Forest.	The County shares the USFS concerns of the potential difficulty of evacuating people from remote subdivisions when wildland fires occur. Consistent with the concern, lower densities are proposed for assignment in the proposed Project and the Project alternatives as compared to the No Project alternative, as discussed in Response to Comment R-9. The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
R-11	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 self-sufficiency for new development projects on FCI lands.	This comment addresses the USFS concerns with providing urban support facilities for subdivision in the CNF. See Response R-6 and Global Response 5 (GR-5).
R-12	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	The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR; however a response has been provided below to respond to the concerns of the USFS. The comment will be included in the administrative record that will be considered by the

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	that water delivery systems be established before enabling increased density on former FCI lands.	decision-makers in evaluating the Project. The County appreciates this comment that groundwater-dependent land uses may negatively impact groundwater resources of adjacent CNF lands, as analyzed in SEIR subsection 2.7.3.2. The potential significant impacts on groundwater supplies and recharge resulting from implementation of the proposed Project would be reduced by the same regulations, implementation programs and mitigation measures from the General Plan Update PEIR and repeated in subsection 2.7.4.2 (Mitigation for Groundwater Supplies and Recharge) within the FCI Lands GPA SEIR. The comment does not provide new information that would alter the analysis, impact determination or proposed mitigation for this issue of groundwater. Any future development that is dependent on groundwater will be subject to the County Groundwater Ordinance, which establishes regulations for the protection, preservation, and maintenance of groundwater.
R-13	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.	The County appreciates the USFS's concern over a lack of access and right-of-way to expand access for areas within or adjacent to the CNF. Please refer to Response to Comments R-06 and R-09 and Global Response 5 (GR-5). The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
R-14	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.	The County acknowledges that the cost of improving roads through CNF lands would be borne by project applicants. See Global Response 5 (GR-5) This issue is not related to an environmental issue pursuant to CEQA.
R-15	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.	See Global Response 5 (GR-5) Potential significant impacts related to biological resources and hydrology are analyzed in Section 2.4 and 2.7, respectively, in the Draft SEIR.
R-16	Increased interface between developed private lands and National	The County appreciates the comment and recognizes that

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	<p>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>development adjacent to CNF lands can create encroachment issues. Generally, the proposed Project assigns lower densities in these areas. SEIR subsection 2.2.3.4 Direct and Indirect Loss or Conversion of Forestry Resources, recognized that impacts could occur from development adjacent to CNF lands and that the Project would have the potential to result in significant indirect impacts. See also Response to Comment O-08 concerning Table 2.4-4 being added to the SEIR showing the number and acreage of parcels that are adjacent to conserved lands, including CNF lands.</p> <p>The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.</p>
R-17	<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.</p>	<p>This comment raises an issue concerning a loss of traditional points of access to the CNF as private lands are subdivided. The lack of formal agreements or easements with private land owners that results in the loss of administrative access to CNF lands is not within the purview of the FCI Lands GPA and is not related to an environmental issue pursuant to CEQA. The County of San Diego does not enforce or determine prescriptive rights to access across private or public land. Traditional points of access may, in some circumstances, represent a trespass situation and not reflect a legal means of ingress/egress into the CNF.</p>
R-18	<p>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.</p>	<p>The County appreciates the comment, which raises the issue that increased development adjacent to the CNF increases impacts from unauthorized uses (see Response to Comment R-16). Encroachment issues are analyzed in SEIR subsection 2.2.3.4, which determined that the proposed Project would potentially result in significant and unavoidable impacts. In addition, the Draft SEIR determined that all alternatives would potentially result in significant and unavoidable impacts due to unauthorized uses (see SEIR subsections 4.2.2.2; 4.3.2.2; 4.4.2.2).</p> <p>The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.</p>

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R-19	<p>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.</p>	<p>The County appreciates the concerns raised with unauthorized motorized vehicle uses, particularly in the Lake Morena area. However, the area adjacent to the Hauser Wilderness area is adjacent to the Lake Morena Rural Village, which is already developed and the proposed Project would allow very little future development. As shown in the Draft SEIR on Figure 1-9, the proposed Project assigns a Rural Lands 20 (RL-20, one dwelling unit per 20 acres) to lands within the Project area adjacent to this area. As shown in SEIR Table 4-4, buildout of the proposed Project in Lake Morena would allow a total of 49 dwelling units, which is 282 units less than allowed under the existing land use designations; one additional dwelling unit than would be allowed by the Modified FCI Condition alternative. Table 1-1C has been added to SEIR subsection 1.2.1 to show how many additional lots would be allowed through subdivision with buildout of the proposed Project. Table 1-1C shows that the subdivision potential of the proposed Project would allow eleven additional lots in the 1,562 acre Project area encompassing the Lake Morena/Campo Sponsor Group Area. The additional detail provided in the modified tables does not result in additional or more severe impacts than disclosed in the Draft SIER; therefore, additional or new mitigation is also not necessary.</p>
R-20	<p>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.</p>	<p>This comment raises the issue that development adjacent to CNF lands increases the pressure to provide diverse kinds of recreation on CNF lands. Impacts to recreation facilities are analyzed within subsection 2.12 of the SEIR. The provision of diverse recreational opportunities is consistent with the CNF Management Plan. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.</p>
R-21	<p>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.</p>	<p>The County appreciates this comment. As discussed in response to Comment R-4, the Wilderness status information was included in staff's analysis when developing the proposed Project land use map and was included as a baseline condition from which the analysis begins. As shown in SEIR Table 1-1B, 62,694 of 71,715 acres (87%)</p>

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	<p>For example, where there is interface between private lands and NFS lands within a designated or recommended 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 higher density development.</p>	<p>within the Project area are assigned either Rural Lands designations or are open space, public or tribal lands.</p> <p>The comment lacks specificity regarding County land use designations with those of the ROS in terms of compatible categories beyond the assertion that the lowest residential densities should be planned adjacent to wilderness areas. Moreover, the comment relates to potential impacts to areas outside of the Project areas and control of the County, e.g. CNF lands. No evidence is provided that incompatible land uses are proposed within the proposed Project or Project alternatives; nor how land use and ROS category compatibility would lessen the identified impacts disclosed in the SEIR.</p> <p>Table 1-1C has been added to SEIR subsection 1.2.1 to show how the proposed Project would reduce the number of new lots that would be allowed through subdivision, as compared to existing land designations. Table 1-1C shows that the subdivision potential of the proposed Project would allow 2,395 new lots, which is substantially fewer than the 11,212 additional lots that would result from buildout of existing land use designations. See Global Response 2 (GR-2).</p>
R-22	<p>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.</p>	<p>This comment discusses the need to maintain an inter-connected network of undeveloped areas or landscape linkages, which is consistent with the existing content of the Draft SEIR. Impacts to wildlife movement corridors is analyzed in SEIR subsection 2.4.3.4 and feasible mitigation is identified in subsection 2.4.4 Mitigation. Specifically, mitigation measures Bio-1.1 through Bio-1.7, Bio-2.3 and General Plan Policies COS-1.1 through COS-1.5, LU-6.1 and LU-6.7 address the need to maintain habitat corridors and linkages.</p>
R-23	<p>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</p>	<p>The County appreciates the comment that higher density zoning may ultimately lead to habitat fragmentation. Please refer to Global Response 2 (GR-2) and the discussion of how the proposed Project land use densities are generally lower than existing land use densities.</p> <p>SEIR subsection 2.4.3.2 discusses how indirect effects resulting from development near CNF and MSCP preserves may result in habitat fragmentation. The impact of habitat fragmentation is analyzed in</p>

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	increasing population density on former FCI lands.	SEIR subsections 2.4.3.1 and 2.4.3.2, and feasible mitigation is identified in subsection 2.4.4 Mitigation. Specifically mitigation measures Bio-1.1 through Bio-1.7 and General Plan Policies COS-1.3, COS-1.6 through COS-1.11, COS-2.1, COS-2.2, LU-6.1 through LU-6.4, LU-6.6, LU-6.7 and LU-10.2 address potential impacts to special status species and mitigation measures Bio-1.1 through Bio-1.7, Bio-2.1 through Bio-2.4 and General Plan Policies COS-1.3, COS-1.6 through COS-1.11, COS-2.1, COS-2.2, COS-3.1, LU-6.1 through LU-6.4, LU-6.6, LU-6.7, LU-10.2 address the potential impacts caused by habitat fragmentation.
R-24	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.	The County appreciates the comment that invasive species enter into new areas through human activity. Potential impacts caused by invasive species are analyzed in SEIR subsections 2.4.3.1 and 2.4.3.2, and feasible mitigation is identified in subsection 2.4.4 Mitigation. Specifically mitigation measures Bio-1.1 through Bio-1.7 and General Plan Policies COS-1.3, COS-1.6 through COS-1.11, COS-2.1, COS-2.2, LU-6.1 through LU-6.4, LU-6.6, LU-6.7, LU-10.2 address potential impacts invasive species impacts to special status species and mitigation measures Bio-1.1 through Bio-1.7, Bio-2.1 through Bio-2.4 and General Plan Policies COS-1.3, COS-1.6 through COS-1.11, COS-2.1, COS-2.2, COS-3.1, LU-6.1 through LU-6.4, LU-6.6, LU-6.7, LU-10.2 address the potential impacts caused by invasive species.
R-25	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 in this area should be addressed.	The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Comments R-25 through R-38 are related to the USFS's preference with regards to land use designations of the proposed Project and do not specifically relate to the substantive analysis within the Draft SEIR. However, the County appreciates the commenter's input. The comment raises concerns for density increase in the Alpine CPA. The highest density adjacent to the CNF is SR-1 (one dwelling per acre). This density will enable the minimum 100 feet of defensible space specified in the June 20, 2014 USFS letter to the Board of Supervisors. Generally, densities are much lower and would enable even larger areas to establish defensible spaces.

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		<p>The SEIR is a Program EIR and thus does not specifically analyze site-specific issues; rather, it intends to set a framework for future development that is compatible with the General Plan Policies and Guiding Principles.</p> <p>The County agrees that road and water systems, along with high fire risk, should be addressed prior to development in the eastern end Alpine CPA, both north and south of Interstate 8. The Program EIR sets forth the framework that shall occur prior to development in these areas, including existing regulations applicable to development projects.</p> <p>Development regulations, such as the County Consolidate Fire Code and agreement to serve letters from water districts would ensure these concerns have been accounted for. This issue is not at variance with the existing content of the Draft SEIR.</p> <p>In addition, the Draft SEIR identified policies and mitigation measures that address these issues, as shown in the SEIR subsections shown below.</p> <ul style="list-style-type: none"> • 2.6.4 — Policies LU-6.11, M-1.2, S-3.1 through S-3.4, S-3.6, S-4.1 and mitigation measures Haz-3.3 and Haz-4.1 through Haz-4.4. • 2.13.4 — Policies LU-5.5, LU-9.8, LU-12.2, M-1.2 M-1.3, M-2.1 through M-2.3, M-3.1 through M-3.3, M-4.2 through M-4.5, M-8.6, S-3.5 and mitigation measures Tra-1.3 and Tra-4.1. • 2.14.4 — Policies LU-8.2, LU-13.2, COS-4.1 and COS-5.5 and mitigation measures USS-2.1 through USS-2.3, USS-4.3 and USS-4.7.
R-26	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.	<p>The County appreciates the comment that Viejas Mountain was designated a Critical Biological Area. The proposed Project assigns a Semi-Rural 10 (SR-10, one dwelling unit per ten acres) to the privately-owned lands adjacent to Viejas Mountain (see area in northeastern portion of Figure 1-2B of the Draft SEIR, Chapter 1 Project Description). This density will not allow any further subdivision for these parcels. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be</p>

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		considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine whether to approve the proposed Project or an alternative to the Project.
R-27	The Modified FCI Condition Alternative would best prevent the environmental and public health and safety impacts described above.	The comment notes the commenter's preference for the Modified FCI Condition alternative. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine whether to approve the proposed Project or an alternative to the Project; however, as discussed in Response to Comment R-26, no further subdivision would be allowed in this area by either the proposed Project or Modified FCI Condition alternative.
R-28	More detailed information about these and other concerns are available in an attached letter to the County Board of Supervisors dated June 20, 2014.	The attached letter, dated June 20, 2014, was sent to the County Board of Supervisors prior to the June 25, 2014 hearing. The County has reviewed this letter and incorporated relevant information, when applicable. (See Response to Comment R-25). The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
R-29	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 fuel treatments, and raise potential for the issues and impacts described above.	This comment recommends a Rural Lands 80 (RL-80) designation (one dwelling unit per 80 acres) to an area in the northeast portion of the Jamul/Dulzura CPA known as the Skye Valley Ranch. In recognition of the lack of access and infrastructure and adjacency to a federally-designated wilderness area, the proposed Project assigns a RL-80 designation, consistent with the recommendation of the commenter (refer to Figure 1-7 of the Draft SEIR). The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine the final land use designations for the Project.
R-30	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	This comment expresses a preference for a RL-80 designation for the parcels adjacent to the Cuyamaca Planning Area along Boulder Creek Road. The County appreciates this comment. The proposed Project

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	the Cleveland National Forest and are adjacent to lands zoned as recommended wilderness.	reflects a combination of RL-40 and RL-80 designations for parcels in the Central Mountain Subregion adjacent to the Cuyamaca Planning Area, which was endorsed by the Board of Supervisors on June 25, 2014 and is consistent with a compromise recommended by the County Planning Commission in November 2013 (refer to Figure 1-4 of the Draft SEIR). As shown in SEIR Chapter 4, the Modified FCI Condition (Figure 4-1.3) and Mid-density (Figure 4-2.3) alternatives assign RL-80 to the entire area, as recommended by the commenter. The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine the final land use designations for the Project.
R-31	Descanso CPA. The Forest encourages the County to retain the lower density RL-80 zoning. The northern part of the Descanso CPA abuts two areas zoned as recommended wilderness. 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.	This comment expresses a preference for a RL-80 designation for the northern portion of the Descanso CPA because this area abuts an area recommended for wilderness designation. The proposed Project assigns a RL-40 (one dwelling unit per 40 acres) designation (refer to SEIR Figure 1-5). The Modified FCI Condition (SEIR Figure 4.1-4) and Mid-density (SEIR Figure 4.2-4) alternatives also assign a RL-40 designation. Table 1-1C has been added to SEIR subsection 1.2.1 to show how many new lots would be allowed through subdivision with buildout of the proposed Project. As shown in this table, a maximum of 26 new lots would be allowed by the proposed Project within the 5,581-acre Project area for Descanso. This is substantially less than the 751 additional lots allowed under existing land use designations. The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine the final land use designations for the Project.
R-32	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 fires especially at this vulnerable time.	The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.

R-33	<p>Pine Valley CPA. The Forest encourages the County to retain the lower density RL-80 zoning. 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 federally designated Pine Creek Wilderness. Parcels along Sunrise Highway are adjacent to the Mount Laguna National Recreation Area.</p>	<p>This comment encourages the County to retain a RL-80 designation for the Project area within the Pine Valley CPA. The County appreciates this comment. The proposed Project generally assigns RL-80 designations to parcels in the Pine Valley CPA, as shown on SEIR Figure 1-13 in Chapter 1, Project Description. Table 1-1C has been added to SEIR subsection 1.2.1 to show how many new lots would be allowed through subdivision with buildout of the proposed Project. As shown in this table, a maximum of 53 new lots would be allowed by the proposed Project within the 12,382-acre Project area for Pine Valley. This is substantially less than the 2,660 additional lots allowed under existing land use designations.</p> <p>The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine the final land use designations for the Project.</p>
R-34	<p>The Forest also supports maintaining the proposed RL-40 zoning adjacent to Buckman Springs Road because the NFS land to the east is zoned as Back Country 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. Retaining the current density limit would help maintain the recreational and scenic values.</p>	<p>This comment supports assigning a RL-40 designation to land adjacent to Buckman Springs Road in the Pine Valley CPA, which is consistent with the proposed Project, as shown on SEIR Figure 1-13 in Chapter 1, Project Description. The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.</p>
R-35	<p>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 and is zoned as recommended wilderness.</p>	<p>This comment recommends a RL-80 designation for the two parcels in the Central Mountain Subregion adjacent to the Julian CPA where a RL-40 designation is assigned by the proposed Project. Since these two parcels are each 40 acres, they would not be able to subdivide under either the RL-40 or RL-80 designation therefore the RL-80 designation would not reduce development potential or lessen impacts. Table 1-1C has been added to SEIR subsection 1.2.1 to show how many new lots would be allowed through subdivision with</p>

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		<p>buildout of the proposed Project. As shown in this table, a maximum of 12 new lots would be allowed by the proposed Project within the 4,921-acre Project area portion of unrepresented Central Mountain. This is substantially less than the 1,034 additional lots allowed under existing land use designations. The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.</p>
R-36	<p>Pendleton – De Luz CPA. The Forest recommends reducing the allowable density to RL-80 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.</p>	<p>This comment recommends RL-80 for the parcels in the Pendleton-DeLuz CPA, since they are adjacent to the San Mateo Canyon Wilderness area and increased densities may require road improvements across CNF lands. As shown on SEIR Figure 1-12 in Chapter 1 Project Description, the proposed Project assigns a RL-80 designation to all former FCI lands within Pendleton- DeLuz, with the exception of one 0.70-acre parcel (APN 101-110-18-00), one 4.6-acre parcel (APN 101-110-17-00) and a portion of an 80-acre parcel (APN 101-110-26-00) that was only partially within the former FCI lands. These parcels are assigned a RL-40 designation since they are either too small to subdivide, or are not surrounded by CNF lands and were assigned RL-40 under the 2011 General Plan Update; therefore, they are not proposed to change from the existing land use designations currently in place. Table 1-1C has been added to SEIR subsection 1.2.1 to show how many new lots would be allowed through subdivision with buildout of the proposed Project. As shown in this table, a maximum of 2 new lots would be allowed by the proposed Project within the 1,011-acre Project area for Pendleton/DeLuz. This is substantially less than the 204 additional lots allowed under existing land use designations. The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.</p>
R-37	<p>North Mountain CPAs. The Forest supports RL-80 zoning in the North Mountain CPA and encourages the county to retain this zoning through the planning process.</p>	<p>This comment supports a RL-80 designation in the North Mountain Subregion. As shown on SEIR Figure 1-11 in Chapter 1 Project Description, the proposed Project assigns a RL-80 designation to most FCI lands in the North Mountain Subregion with the exception of parcels along East Grade Road where a RL-40 is assigned. These</p>

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		<p>higher densities are generally consistent with existing parcel sizes and are a result of the public outreach process, which included hearings by the Planning Commission and Board of Supervisors. Table 1-1C has been added to SEIR subsection 1.2.1 to show how many new lots would be allowed through subdivision with buildout of the proposed Project. Table 1-1C shows that the subdivision potential of the proposed Project would only allow 25 new lots in the over 17,000-acre North Mountain Subregion (20 new lots in Palomar Mountain sub-area and five new lots in the remainder of the Subregion). The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.</p>
R-38	<p>We are uncertain of the proposed density for the triangular parcel on the north side of Warner Springs, which abuts the Caliente recommended wilderness. Reducing the density for this parcel to the RL-80 zoning would better buffer the recommended wilderness area from adjacent land uses.</p>	<p>The triangular parcel in the North Mountain Subregion referenced by this comment is assigned a Specific Plan Area designation by the proposed Project (refer to SEIR Figure 1-11) and is a cultural preserve which would not allow for future development. The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.</p>
R-39	<p>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. 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. The Proposed Project clearly conflicts with 6 of the 10 objectives, as the rationale beneath each objective below demonstrates:</p>	<p>This is an introductory comment setting forth the commenter's rationale for why they believe the proposed Project fails to meet Project objectives in provided in Comments R-40 through R-45. The County does not agree that the proposed Project fails to meet the majority of the Project objectives and the rationale for how Project objectives are met is provided in Responses to Comments R-40 through R-45.</p>
R-40	<p>Promote sustainability by locating new development near existing</p>	<p>The County does not agree that the proposed Project conflicts with</p>

<p>infrastructure, services, and jobs. -Remote parcels within and adjacent to the Cleveland National Forest are far from infrastructure, services, and jobs.</p>	<p>the Project objective to promote sustainability by locating new development near existing infrastructure, services, and jobs. The FCI Lands GPA proposes land use designations on former FCI lands that would be consistent with the 2011 General Plan Update Policies and Guiding Principles, this is not the same as “new development.” The proposed Project and Project alternatives contemplate land use designations consistent with this Project objective because it assigns low density land uses in remote areas of the unincorporated county. As discussed in Response to Comment R-02 and Global Response 2 GR-2, development could occur in these areas even without Project implementation in accordance with existing General Plan designations (No Project alternative), and at greater densities than the proposed Project. As explained in further detail below, low-density development in remote areas is proposed throughout the Project areas, while providing nearly all except for the potential growth in an area within or adjacent to an area with infrastructure, the community of Alpine, which is not remote, nor far from services and jobs or employment opportunities. Therefore, the proposed Project would be consistent with this objective.</p> <p>It is acknowledged that most parcels within the Project area are remote and far from infrastructure, services and jobs; with the exception of parcels in the Alpine Community Planning Area (CPA). The parcels in the Project area within the Alpine CPA are located either within or adjacent to the County Water Authority boundary, adjacent to or directly east of the Alpine Village and the urban-type development of the Viejas casino, hotel and shopping mall, directly accessible to Interstate 8.</p> <p>Table 1-1C has been added to SEIR subsection 1.2.1 to show how many new lots could be achieved through subdivision with buildout of the proposed Project. Table 1-1C shows that the subdivision potential of the proposed Project would allow 2,470 new lots; however, only 245 of these new lots would be located outside the Alpine CPA. Table 1-1C further shows that the proposed Project would result in substantially less development than existing land use designations, which would allow 11,287 new lots (10,326 of which are located outside of the Alpine CPA). Note, Table 1-1C does not</p>
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		include parcels proposed for non-residential uses, such as Open Space (Conservation), Public Agency Lands, Tribal Lands, and Rural Commercial.
R-41	<p>Promote environmental stewardship that protects the range of natural resources and habitats that uniquely define the County's character and ecological importance.</p> <p>-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>	<p>The County does not agree that the proposed Project conflicts with the Project objective to promote environmental stewardship. Little increased development would occur in remote areas under the proposed Project and the increased development is substantially less than the development potential under the existing land use designations. As described in the SEIR Chapter 1 Project Description and Chapter 4 Project Alternatives, the proposed Project and alternatives all propose a reduction in development potential compared to the existing land use designations. Refer to Global Response 2 (GR-2). Furthermore, SEIR Section 2.4 analyzes impacts to vegetation communities, sensitive plants and wildlife, and wildlife corridors based on full buildout of the proposed Project and each Project alternative. The impacts from the proposed Project were compared to each Project alternative in the SEIR. The Draft SEIR concludes that as a result of the proposed Project and each Project alternative, the level of significance for special status species, riparian habitat and other sensitive natural communities and wildlife movement corridors and nursery sites would remain significant and unavoidable after implementation of feasible mitigation measures and General Plan Policies. This analysis includes both existing and additional parcels gained through subdivision. Therefore, the proposed Project would be consistent with this objective.</p>
R-42	<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>	<p>The County does not agree with the comment that the proposed Project conflicts with the Project objective to ensure that development accounts for the physical constraints and natural hazards of the land. The proposed Project will substantially reduce development potential throughout the Project areas when compared to the existing land use designations, by applying lower densities that experience severe risk of wildland fire incursion. Therefore, the proposed Project would be consistent with this objective. Refer to Global Response 2 (GR-2).</p> <p>The proposed Project substantially reduces development potential in remote areas, when compared to existing land use designations.</p>

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		Meeting Project objectives is not a significance criteria employed for impact determination; refer to Global Response 1 (GR-1). Potential impacts associated with the development on a site which would result from physical constraints are evaluated throughout the SEIR; the comment is not specific to any individual constraint.
R-43	<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>	<p>This Project objective does not apply to the remote areas referenced by the comment because the intention of this Project objective is to support a multi-modal transportation network in areas with compact development patterns (Refer to Guiding Principle 6 on page 2-12 of the County General Plan). Meeting Project objectives is not a significance criteria employed for impact determination; refer to Global Response 1 (GR-1). The proposed Project will substantially reduce development potential throughout the Project areas when compared to the existing land use designations, by applying lower densities, see Table 1-1A; refer to Global Response 2 (GR-2). The proposed Project assigns Rural Lands designations (one dwelling per 40 or 80 areas) as shown on the land use maps provided in the SEIR as Figures 1-3 through 1-14. Development applications associated with the former FCI-lands will be required to meet current design standards for access, depending on the proposed development; private or public road standards would be a standard condition of approval. Therefore, the proposed Project would be consistent with this objective.</p>
R-44	<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>	<p>The County does not agree that the proposed Project conflicts with the Project objective to maintain environmentally sustainable communities and reduce greenhouse gas emissions. Meeting Project objectives is not a significance criteria employed for impact determination; refer to Global Response 1 (GR-1). The proposed Project will substantially reduce development potential throughout the Project areas when compared to the existing land use designations by applying lower densities, which would in turn reduce greenhouse gas emissions when compared to existing General Plan designations (No Project Alternative) (see Table 1-1A; refer to Global Response 2 (GR-2)). Please also see Response to Comment R-40 for reasons why slightly increased development potential near Alpine is proposed. VMT is analyzed in the SEIR subsection 2.15.3.1,</p>

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		Estimation of Greenhouse Gas Emissions, and VMT calculations are shown in the SEIR Appendix F, pages F-1 through F-3.
R-45	<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>	<p>The County does not agree that the proposed Project conflicts with the Project objective to minimize public costs of infrastructure. Meeting Project objectives is not a significance criteria employed for impact determination; refer to Global Response 1 (GR-1). The comment does not explain how private wells that use groundwater and development applications necessarily “would maximize public costs of infrastructure and services.”</p> <p>The proposed Project will substantially reduce development potential throughout the Project areas when compared to the existing land use designations; refer to Global Response 2 (GR-2). The proposed Project assigns Rural Lands designations (one dwelling per 40 or 80 areas); see SEIR Figures 1-3 through 1-14. The majority of single-family homes that would be developed within the FCI-lands will necessitate their own potable water well and alternative waste water treatment systems; i.e. septic tanks, rather than public systems. These are private infrastructure elements, not public.</p>
R-46	<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>The County disagrees that an “assumption” of less than significant impacts was made throughout the SEIR in the impact analysis. The SEIR contains substantive analysis and reasoning as to how impact conclusions were reached. Furthermore, the proposed Project itself does not “subdivide” areas of the region. As previously detailed, the proposed Project provides updated land use designations within the Project area that currently have a land use designation that goes back to the 1978 General Plan due to the expiration of the FCI.</p> <p>SEIR Executive Summary Table S-2 provides a summary of the level of significance for each topic area analyzed in the Draft SEIR. This table shows that 46 topic areas were determined to be Less than Significant and 24 topic areas Significant and Unavoidable after mitigation measures. These determinations were made consistent with the criteria in CEQA Guidelines Section 15126.4.</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 (GPU) Program EIR. The FCI Lands GPASEIR,</p>

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		<p>supplements the General Plan Update Program EIR. The General Plan Update PEIR was developed consistent with CEQA guideline 15168. The potential for significant impacts and their mitigation from General Plan Policies and Mitigation Measures is summarized in the Executive Summary and can be reviewed in Table S-2. The relative impacts comparing the project alternatives are summarized and can be reviewed in Table 4-1. Concerning cultural resources, it was determined that impacts would be less than significant with the adherence to numerous General Plan policies and mitigation measures. Concerning “natural resources,” several impacts within biological resources were determined to be significant and unavoidable after mitigation.</p>
R-47	<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 of population density in remote areas of the County will necessarily have significant impacts, regardless of “regulations, implementation programs, and mitigation measures.” The scope of the cumulative impacts section needs to be broadened to include development that has occurred up to the current time.</p>	<p>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 analysis that considered existing conditions at the time the NOP was issued. Each resource and its associated significance criteria is analyzed for direct, indirect and cumulative impacts and the potential for impacts prior to and post implementation of General Plan Policies and Mitigation Measures is disclosed throughout the document. Please refer to Table S-2 for a summary of the impact determinations.</p>
R-48	<p>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.</p>	<p>The County does not agree that the SEIR fails to offer the level of detailed needed to evaluate the environmental impacts of its alternatives. The SEIR is a Program EIR, which the County has prepared to comprehensively address development within the Project areas. As detailed in CEQA Guideline 15168(b), a Program EIR can: (1) Provide an occasion for a more exhaustive consideration of effects and alternatives than would be practical in an EIR on an individual action, (2) Ensure consideration of cumulative impacts that might be slighted in a case-by-case analysis, (3) Avoid duplicative reconsideration of basic policy considerations, (4) Allow the Lead Agency to consider broad policy alternatives and program-wide mitigation measures at an early time when the agency has greater flexibility to deal with basic problems or cumulative impacts, and (5)</p>

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		<p>Allow reduction in paperwork.</p> <p>The SEIR prepared for the proposed Project provides these benefits to both the Lead Agency and other interested parties. The SEIR provides an exhaustive analysis of reasonably foreseeable impacts that would occur under adoption of the proposed Project.</p> <p>Consistent with CEQA Guideline 15126.6 (a) (b) and (c), the FCI Lands GPA SEIR analyzes a reasonable range of alternatives which are described within Chapter 4 of the Draft SEIR and include No Project, Alpine Alternative Land Use Map, Mid-density and Modified FCI Condition alternatives, along with alternatives considered but rejected, such as Reduced Development/No Build, Increased Intensity (Alpine CPA), FCI Density, No New East Willows Village and City-Centered. Consistent with CEQA Guideline 15126.6 (d) the SEIR “...include(s) sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project.” As discussed in the Draft SEIR, the No New East Willows Village and No Project alternatives would have greater impacts because they would have greater densities and/or intensity than the proposed Project; refer to Global Response 2 (GR-2). The Modified FCI Condition, Mid-density and Alpine Alternative Land Use Map alternatives all reduce the severity of potential impacts relative to their decreased density and or intensity when compared to the proposed Project. The potential impacts associated with the Project alternatives are compared to the proposed Project and the Draft SEIR provides independent analysis of the alternatives as required by CEQA Guideline 15126.6(d). Specific public health and safety impacts are not identified by the comment; potential impacts of the proposed Project related to public health and safety are evaluated in Sections 2.6 Hazards and Hazardous Materials and 2.11, Public Services. Each Project alternative potential impact analysis for all resource subjects are found throughout the Project Alternatives analysis of Chapter 4.</p>
R-49	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	<p>The County disagrees with the comment that potential impacts to sensitive species are not identified and disclosed. Please see Response to Comment R-48 for the intent of a Program EIR. The Draft SEIR for the FCI Lands GPA is a programmatic document. The FCI Lands GPA SEIR supplements the General Plan Update Program EIR.</p>

	<p>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>	<p>The General Plan Update PEIR was developed consistent with CEQA guideline 15168. The potential for significant impacts and their mitigation from General Plan Policies and mitigation measures is summarized in the Executive Summary and can be reviewed in Table S-2. The relative impacts comparing the Project alternatives are summarized and can be reviewed in Table 4-1. The Draft SEIR evaluates potential impacts using a plan to ground analysis. Subsection 2.4.3.1 regarding special status plant and wildlife species discloses:</p> <p>“This proposed Project consists of changes to the land use designations over 71,700 acres of land which support special status plant and wildlife species. Similar to the 2011 General Plan, the project would directly or indirectly impact habitats of candidate, sensitive, or special status species. The General Plan Update PEIR included a discussion of each vegetation community in the unincorporated County and the species supported by each vegetation community in subsection 2.4.1.2 of the General Plan Update PEIR. Table 2.4-1 (Habitat Impacts by Vegetation Community) quantifies the total number of acres of each vegetation community that could be potentially affected by new development under the proposed Project. The majority of the impacts are expected to occur within scrub and chaparral, woodland and forest vegetation communities, with lesser impacts occurring on riparian and bottomland habitat, grasslands, vernal pools, meadows and other herb communities. The species that occupy these habitats are the same as those identified in the General Plan Update PEIR and can found in subsection 2.4.1.4, pages 2.4-2 to 2.4-9, under each vegetation description. Appendix C of the General Plan Update PEIR, Table C1, Special Status Plant Species with a Potential to Occur within San Diego County and Table C2, Special Status Wildlife Species with a Potential to Occur within San Diego County is hereby incorporated by reference.”</p> <p>The SEIR discloses that habitat may be impacted and when Table C1 is reviewed, individual species which are associated with those</p>
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		impacted habitats are specifically identified.
R-50	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 and is therefore inconsistent with the purpose and intent of CEQA.	The County does not agree with the comment that the SEIR analysis does not adequately analyze and disclose potential effects; see Responses to Comments R-48 and R-49. The SEIR does not represent a piecemeal analysis; rather, it comprehensively addresses the reasonably foreseeable impacts of the "program," which in this case is the updated land use designations of the Project areas. By comprehensively addressing these land use designation changes, the mitigation measures provide a framework for future projects that would be implemented under the program.
R-51	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.	Please see Responses to Comments R-48, R-49 and R-50. The County does not agree that the Draft SEIR lacks sufficient detail to perform a meaningful comparison of the effects of the different alternatives. In Chapter 4 of the revised Draft SEIR, relative impacts comparing the Project alternatives are summarized and can be reviewed in Table 4-1. Tables 4-2 through 4-12 the Draft SEIR also provide a comparison of the Project alternatives relative to various resources. These tables include data on land use distribution, number of dwelling units at buildout, potential impacts to the Palomar and Mount Laguna Observatory Zone A at buildout, agricultural lands and impact estimates, proposed land uses in forest resources, area-wide and mobile source emissions, biological resources impacts, proposed land use within flood areas, proposed land uses in designated Mineral Resource Zone area and average daily traffic generation. In addition, SEIR Figures 2.4-2A and 2.4-2B have been enhanced to also show East County Focused Conservation Areas (FCAs) and conserved areas.
R-52	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	The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.

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	modified, or if additional mitigation measures should be required.	
R-53	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 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.	The Draft SEIR for the FCI Lands GPA is a programmatic document. The FCI GPA SEIR supplements the General Plan Update Program EIR. The General Plan Update PEIR was developed consistent with CEQA guideline 15168. The potential for significant impacts and their mitigation from General Plan Policies and Mitigation Measures is summarized in the Executive Summary and can be reviewed in Table S-2. The relative impacts comparing the Project alternatives are summarized and can be reviewed in Table 4-1. As such, the Draft SEIR evaluates potential impacts using a plan-to-ground analysis. The County disagrees with the comment that potential impacts to cultural resources are not identified and disclosed, nor is assumed in advance, to be less than significant. Refer to the Impact Analysis portions of Section 2.5 of the SEIR. Historical resources are analyzed in subsection 2.5.3.1; Archaeological Resource impacts are discussed in subsection 2.5.3.2; Paleontological resource impacts are discussed in subsection 2.5.3.3; Human Remains resource impacts are discussed in subsection 2.5.3.4; and the mitigation for each of these resource impacts begins with subsection 2.5.4.
R-54	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.	The County disagrees with the characterization of impacts being presumed. The impacts are determined using the appropriate significance criteria and described in the various subsections identified in Response to Comment R-53. Further, the comment acknowledges that impacts have been determined, which is inconsistent with the previous comment asserting that impacts are not adequately disclosed. The applicable mitigation measures identified within subsection 2.5.4 would apply to future development through the imposition of project Conditions of Approval and/or mitigation measures through discretionary permit approvals. No evidence has been provided in this comment that provides the rationale to assert the inefficacy of the identified General Plan Policies and mitigation measures.
R-55	In Section 2.5 "Cultural Resources" of Table S-3 and various other sections of the Draft SEIR contain information indicating that the	This comment correctly characterizes the analysis in the Draft SEIR that the Modified FCI Condition alternative is likely to result in less

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	<p>“Modified FCI Condition” 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 resources would be “less than significant” with the implementation of mitigation measures for the Proposed, Modified, and No Action alternatives.</p>	<p>impacts to historical resources when compared to the proposed Project (SEIR subsection 4.2.2.5) and that impacts to historical and archaeological resources would be considered significant and would require mitigation measures identified in the Draft SEIR (SEIR subsections 4.2.2.5, 4.3.4.5, 4.4.2.5, 4.5.2.5). The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.</p>
R-56	<p>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>The County does not agree with the comment that the significance of potential impacts is made by assumption, nor does the SEIR state an assumed distribution of resources. Rather, Figure 2.5-1, Historical Resources, identifies the County’s historic resources in relation to the areas affected by the proposed Project; distribution of resources is not assumed for known resources. However, the presence of unknown resources is assumed and General Plan Policies and mitigation measures have been identified in SEIR Section 2.5.4, that address the potential impacts to unknown resources and the SEIR determined these policies and measures will render the potential impacts to a less than significant level. The variable levels of proposed development densities and intensity, is the basis of comparison between the proposed Project and the alternatives. The quantitative comparison of development potential reveals the Modified FCI Condition alternative as the Environmentally Superior alternative. The comment does not offer additional alternatives, policies or mitigation measures to address the identified potential impacts. The SEIR discloses the potential for impacts to known and unknown cultural resources and identifies General Plan Policies and mitigation measures to address the potential impacts caused by construction activities such as grading and excavation, and renders them less than significant. No changes to the environmental document are required.</p>
R-57	<p>Page 12 of the “County Cultural Guidelines” states that “Determining what is an important cultural resource worth preserving [sic] is a 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</p>	<p>The comment fairly characterizes the criteria used to evaluate cultural resources. The SEIR discusses the Regulatory Framework that pertains to cultural resources in subsection 2.5.2. The Guidelines for Determining Significance are discussed in subsections 2.5.3.1, 2.5.3.2, 2.5.3.3 and 2.5.3.4.</p>

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	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.”	
R-58	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 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 archaeological resources.	The SEIR discloses the potential for impacts to known and unknown resources; the County disagrees with the comment that no “actual assessment or evaluation of historic and archaeological resources” has occurred. Moreover, there is no need to further evaluate a known cultural resource, as the resource’s attributes that make the artifact, place, building or landscape a resource has already been identified and their significance determined. The SEIR analyzes the potential for impacts to these resources as they are already known to be resources. Unknown resources are just that: unknown. Unless and until they are discovered, unearthed or otherwise disturbed, they remain unknown. See Responses to Comments R-52 through R-56. Alternatives described in the Draft SEIR include a No Project, Alpine Alternative Land Use Map, Mid-density and Modified FCI Condition. The variable levels of proposed development densities and intensity, is the basis of comparison between the proposed Project and the alternatives. The quantitative comparison of development potential reveals the Modified FCI Condition alternative as the Environmentally Superior alternative. The comment does not offer additional alternatives, policies or mitigation measures to address the identified potential impacts. The SEIR discloses the potential for impacts to known and unknown cultural resources and identifies General Plan policies and mitigation measures to address the potential impacts caused by construction activities such as grading and excavation, and renders them less than significant. No changes to the environmental document are required.
R-59	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.	This comment concerning subsection 2.6.3.7 of the SEIR is consistent with information contained in the Draft SEIR. The Draft SEIR states clearly that the General Plan Policies and mitigation measures result in the reduction of impacts to a level of less than significant.

R-60	<p>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 comment misinterprets the determination of infeasibility of mitigation measures that would limit future development in effort to reduce hazards associated with wildland fire; these mitigation measures apply to the entire unincorporated County rather than just the Project areas as they are General Plan Policies and mitigation measures. As disclosed in SEIR subsection 2.6.4.7, the determination of the mitigation measure as infeasible is also attributed to the requirement for extensive fuel modification around existing and future development in Wildland Urban Interfaces. This mitigation measure would be inconsistent with General Plan and Project objectives to protect biological resources, minimize impacts to drainage patterns and to limit modification to the visual landscape. Restricting growth in areas already identified by the General Plan as areas to accommodate growth would conflict with General Plan objectives to accommodate a reasonable share of growth, consistent with the Community Development Model.</p> <p>The County disagrees that the proposed Project increases population density (refer to Response to Comment R-2 and GR-2). Refer also to the SEIR Chapter 4 table in subsection 4.1.1. under the considered but rejected FCI Density Alternative, which shows that 81.4% of the Project acreage would either reduce or retain the RL-40 density analyzed in the 2011 General Plan EIR. Generally, those areas where densities are proposed to increase are either not in remote areas or reflect existing parcel sizes; therefore, do not allow for additional subdivision.</p>
R-61	<p>On a related note, the sections that Deal with Emergency Response and Evacuation Plans (2.6.3.6 and 2.6.4.6) conclude that significant impacts will be avoided through 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</p>	<p>The County does not agree with this comment. In reference to subsection 2.6.3.6 Emergency Response and Evacuation Plans of the SEIR, the significance criteria is:</p> <p><i>Based on Appendix G of the CEQA Guidelines and the County of San Diego Guidelines for Determining Significance, Emergency Response Plans, the proposed Project would have a significant impact if it would impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan.</i></p> <p>Subsection 2.6.4.6 discusses those General Plan Policies and</p>

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	<p>high to very high fire hazards makes the likelihood even greater that implementation of the Proposed Project would lead to tragic losses of life and property.</p>	<p>mitigation measures related to Emergency Response and Evacuation Plans. As can be reviewed in subsection 2.6.4.6, General Plan Policies have been developed to support efforts and programs that address reducing the risk of natural and man-made hazards and the appropriate disaster response, provide for an interconnected public road network with multiple connections that improve efficiency, provide both primary and secondary access/egress routes that support emergency services during fire and other emergencies, require new development to provide multiple access/egress routes, and require public and private roads to allow for necessary access for fire apparatus and emergency vehicles accommodating outgoing vehicles from evacuating residents. Adherence to these policies will reduce direct impacts to emergency response and evacuation plans from future development. Additionally, mitigation measure Haz-3.3 will ensure that projects are consistent with adopted emergency and evacuation plans. Therefore, the proposed Project would have a less-than-significant impact for the reasons detailed above.</p>
R-62	<p>Given that the FCI lands are by definition in close proximity to the Cleveland National 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 in 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 FCI Lands GPA process. County staff also coordinated with USFS staff to ensure that the Land Management Plan was fully understood and to get feedback on the County’s draft plans. In addition, much of the proposed Project land use map was developed in response to the USFS comment letter on the Draft SEIR circulated for public review in 2013. The following specific areas reflect the recommendations in the 2013 USFS comment letter:</p> <ul style="list-style-type: none"> • Alpine northeast of the Viejas Reservation • Jamul [Skye Valley Ranch] • Pine Valley • Central Mountain • Areas west of Cuyamaca CPA • Descanso • Pendleton-DeLuz • North Mountain <p>There are only two areas that the proposed Project land use map does not reflect the land use designations recommended by the USFS staff in 2013. These areas, along with the County’s response are</p>

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		<p>provided below.</p> <p>Alpine CPA north and south of Interstate 8 (I-8) — Development regulations will require adequate infrastructure, such as the expansion of imported water and road access before discretionary development application are approved. Therefore, no conflict with the Land Management Plan has been identified to date.</p>
R-63	<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.</p>	<p>The proposed Project land use map reflects the USFS staff comments provided in 2013; please refer to Response to Comment R-62. The County does not agree there is a disconnect between this project and the Forest Land Management Plan. FCI lands are not within designated or recommended wilderness areas as these areas are federal lands not subject to local land use authority.</p>
R-64	<p>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.</p>	<p>Please see the Response to Comment R-63. FCI lands are not within designated or recommended wilderness areas as these areas are federal lands not subject to local land use authority. In addition, as detailed in Draft SEIR Section 2.4.3.1, it is acknowledged that the Project would result in indirect impacts to sensitive species and habitat where such development occurs adjacent to CNF lands or MSCP Preserves. Such indirect effects include, but are not limited to, intensive nighttime lighting, noise, and domestic pets which can adversely affect wildlife species. Such impacts would also be cumulative in nature as they would contribute to the permanent loss of the County's biological resources on a regional level (i.e., through the physical demolition, destruction, relocation, or alteration of these resources and/or immediate surroundings), when combined with other development allowed under the 2011 General Plan. Indirect impacts would be significant and unavoidable. The Board of Supervisors would consider this impact when determining to approve or deny the project and a Statement of Overriding Considerations would be required if project approval were to occur. Furthermore, as shown in SEIR Executive Summary Table S-2 and subsection 2.2.3.4, the Draft SEIR determined that regarding Direct and Indirect Loss or Conversion of Forestry Resources, the proposed Project would result in significant and unavoidable impacts. The comment does not raise an issue at variance with the existing content of the Draft SEIR.</p>

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R-65	<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 untrammeled 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 a 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 untrammeled (unmanaged) nature.</p>	<p>The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.</p>
R-66	<p>Increased density and development near or adjacent to designated or recommended wilderness areas would likely adversely affect the wilderness resource in a number of 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.</p>	<p>The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.</p>
R-67	<p>The visual impact of subdivisions on the wilderness user is also due consideration. 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.</p>	<p>As discussed in Response to Comment R-40, the proposed Project would allow only 245 additional lots within the entire Project area outside the Alpine CPA; little additional development potential would be allowed adjacent to wilderness areas. Consistent with the discussion of SEIR subsection 2.4.3.2, invasive plants, in addition to other effects, will indirectly and cumulative impact federal lands and MSCP preserves. These impacts are disclosed as significant and unavoidable even after the implementation of mitigation and General Plan policies.</p>
R-68	<p>Development upstream within watersheds shared by wilderness increases the likelihood of impaired water quality or decreased</p>	<p>The comment does not raise an issue regarding the sufficiency of the analysis in the Draft SEIR. The comment will be included in the</p>

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	stream flows in wilderness due to runoff, impoundments, and/or groundwater use.	administrative record that will be considered by the decision-makers in evaluating the Project.
R-69	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.	The comment does not raise an issue regarding the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
R-70	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.	The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. See also, Responses to Comments R-4, R-19, R-40 and R-43.
R-71	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 accessed 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.	The County is not proposing to increase recreation land use or facilities under the FCI Lands GPA. Analysis of potentially significant effects on recreation resources from future development on lands affected by the proposed FCI Lands GPA is analyzed in SEIR subsection 2.12.3 and General Plan Policies and feasible mitigation measures are identified in the Draft SEIR, subsection 2.12.4. See also Response to Comment R-72.
R-72	Increased population in the County would likely lead to an increase in recreation in both developed facilities and undeveloped, backcountry areas. While this increased use could have beneficial recreational impacts, the SEIR should include an analysis of environmental impacts that result from recreation in undeveloped backcountry areas, as it does for developed facilities.	The County concurs that increased population could lead to an increase in recreation, which is analyzed within the Draft SEIR. Draft SEIR subsection 2.2.4.3 recognized that future development within the Project area may result in land uses that are incompatible with adjacent or nearby CNF lands and that such development could eventually lead to permanent impacts on the CNF lands due to factors such as erosion/siltation, invasive plants, edge effects (e.g., human intrusion, predation by pets), noise (e.g., nest abandonment), night-lighting (e.g., nocturnal wildlife predation), and habitat fragmentation, or the indirect conversion of such lands to non-forest use. SEIR subsection 2.2.4.4 determined that even with the implementation of mitigation measures, the direct conversion of forestry resources would remain significant and unavoidable. In addition, analysis of potentially significant effects on recreation resources from future development on lands affected by the proposed FCI Lands GPA is analyzed in SEIR subsection 2.12.3 and General Plan Policies and feasible mitigation measures are identified

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		in the Draft SEIR, subsection 2.12.4.
R-73	We appreciate the development and consideration of the Modified FCI Condition (Environmentally Superior) Alternative as described in Chapter 4.1. From our perspective, the sacrifice of 28% of the residential dwelling units of the Proposed Project would be worth the resultant protection of resource conditions and reduction of wildfire risk to communities and would best achieve the objectives of the General Plan. Moreover, the areas where the lower densities would be located, as specified in the Modified FCI Condition Alternative, are precisely the areas where resource and wildfire concerns are greatest. As a result, we strongly support the adoption of the Modified FCI Condition Alternative rather than the Proposed Project.	The comment presents the commenter's preference for the Modified FCI Condition alternative. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
R-74	In addition, we request provisions that development on private lands will not rely on the Cleveland National Forest for infrastructure or vegetation management needs and that impacts to the Cleveland National Forest from such development will be avoided, minimized, or mitigated.	See Response to Comment R-6. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
R-75	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 re-circulated 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.	This comment provides concluding remarks and does not raise a significant environmental issue for which a response is required.

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S-1	Thank you for the opportunity to comment on the Forest Conservation Initiative Lands (FCI) General Plan Amendment (GPA). The San Diego Chapter of the California Native Plant Society (CNPSSD) works to protect California's native plant heritage and natural ecology to preserve precious and often threatened resources for future generations. We work closely with decision-makers, scientists, and local planners to advocate for well informed and environmentally friendly policies, regulations and land management practices.	This comment is an introduction to comments that follow. No further response is required.
S-2	In general, we support the Environmentally Superior Modified FCI Condition Alternative. Our reason is that we believe the County generally underestimates the real impacts of climate change and extended drought. While we advocate for native plants and plant communities, we are also San Diegans, and putting people and plants in dangerous situations should be avoided.	This comment advocates support for the Modified FCI Condition alternative and states that the County “generally underestimates the real impacts of climate change and extended drought.” The County does not agree with the latter comment. However, the last sentence of SEIR Section 2.15.3.2 Potential Effects of Global Climate Change on the Proposed Project acknowledges the Project’s impacts would be significant and unavoidable (page 2-15-20). The comment does not otherwise provide the manner in which these impacts are underestimated. The comment also states that “putting people and plants in dangerous situations should be avoided.” It is not entirely clear as to what the comment is specifically contending, and therefore a specific response cannot be provided. However, it should be noted that the SEIR analyzed potential impacts from the Project associated with Global Climate Change, Hazards and Hazardous Materials, etc. Please refer to Chapter 2 of the SEIR. Finally, the comment does not raise any issues concerning the sufficiency of the Draft SEIR’s analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
S-3	In this case, dangers include things like fire, for people living on the wildland-urban interface.	Section 2.6 of the SEIR analyzed potential impacts associated with wildland-urban interface (WUI) areas. As detailed therein, impacts would be significant and unavoidable even after the implementation of mitigation. The comment does not raise any issues concerning the sufficiency of the Draft SEIR’s analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.

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S-4	Dangers include extended droughts, and their follow-on effects on groundwater uptake, reduced ability to fight fires due to reduced reservoirs, and extended drought causing people to abandon properties and move, as happened in the Dust Bowl.	This comment generally discusses groundwater, water supply and wildland fires, which are analyzed within SEIR Sections 2.7, 2.14 and 2.6, respectively. The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
S-5	They also include the dangers of floods, especially when heavy rain falls on a drought-stricken landscape.	This comment generally raises concerns regarding the dangers of floods. Flooding is analyzed within SEIR Section 2.7. The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
S-6	For all these reasons, we urge the County to be conservative in its growth. Like it or not, growth in this County is a multivariate calculus that involves the long-term availability of water, power, and food. Growth is no more inevitable here than it was in Detroit or the Yucatan of the Classic Maya. We should be thoughtful about how we encourage people to put down roots here.	The County acknowledges the commenter's support for conservative growth in the Project area. The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. However, overall, the proposed Project land use map has lower land use intensities than the existing land use designations. The lower intensity of the proposed Project would reduce the subdivision capacity within the Project areas by 8,849 lots, when compared to the existing land use designations (No Project Alternative), [see Draft SEIR, Chapter 4, Table 4-4]. Therefore, the proposed Project takes a more conservative approach to growth than the existing land use designations. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
S-7	In regard to native plant species, our concerns and suggestions are as follows: -Plant species need to be able to move to adapt to climate change. In past periods of climate change, as during the last ice age, native plant species survived by migrating, just as animals survived by migrating. Wildlife corridors should be designed so that native plants can migrate (by means of seeds) too. Basically, this means that plants need places to grow near wildlife corridors, that urban chokepoints (like concreted wildlife undercrossings) should be avoided where possible, corridors should not be part of brush	The County does not agree that the SEIR needs to be revised to incorporate ideas on the design of wildlife corridors. The underlying purpose of the proposed Project is to update land use designations for numerous, scattered FCI Lands throughout the County. These lands are often privately held and have the potential to be developed by a landowner with or without the implementation of the proposed Project. The designation of wildlife corridors would be more appropriately included in habitat conservation plans, such as the South County Multiple Species Conservation Plan (SCMSCP) and the North County MSCP, which is currently under development. SEIR

	<p>management zones (since plants often do not survive being "brush managed"), habitat for pollinators and seed dispersers should be prioritized, and spraying of pesticides should be minimized or banned around critical corridors, so that plants can flower, be visited by healthy pollinators, set seed, and those seeds can spread. We suggest these ideas be incorporated into the Biology mitigation language.</p>	<p>subsection 2.4.3.4 Wildlife Movement Corridors and Nursery Sites provides an analysis for how the proposed Project would impact wildlife corridors. This analysis concludes that the proposed Project would result in significant and unavoidable direct, indirect and cumulative impacts on wildlife corridors.</p> <p>SEIR subsection 2.4.4.1 includes mitigation measures and General Plan Policies to address impacts to Special Status Plant and Wildlife Species; it includes Policies COS-1.3, COS-1.6 through COS-1.11, COS-2.1, COS-2.2, LU-6.1 through LU-6.4, LU-6.6, LU-6.7, LU-10.2 and mitigation measures Bio-1.1 through Bio-1.7. Further, SEIR subsection 2.4.4.4 includes mitigation measures and General Plan Policies to address impacts to Wildlife Movement Corridors and Nursery Sites; it includes Policies COS-1.1 through COS-1.5, LU-6.1, LU-6.7 and mitigation measures Bio-1.1 through Bio-1.7 and Bio-2.3. Many of the commenter's concepts are included within these policies and measures.</p>
S-8	<p>The GPA should clarify, both in the biology section (2.04) and especially the hazards section (2.06, p. 2.6-23 and elsewhere) that "flammable vegetation" is not synonymous with native plants. Research by CNPSSD chapter member Greg Rubin¹ strongly suggests that native plants in the landscaping are <i>less</i> flammable than non-native landscape plants like rosemary, lantana, and eucalyptus. We urge the County to make this explicit, in order to break the unthinking prejudice caused by outdated ideas that landscaping with native species is dangerous to people due to the risk of "brush" fires. Properly designed and maintained native landscaping is extremely safe, and we want people to be able to use it.</p>	<p>This comment generally states that the Draft SEIR should be amended to further clarify that "flammable vegetation" is not synonymous with native plants. The County does not agree and no revisions to the Draft SEIR have been made for the following reasons. The General Plan already recognizes the importance of native vegetation, as evidenced by Policy COS-2.1, Protection, Restoration and Enhancement, which is recognized in SEIR subsection 2.4.4.1; however, its inclusion would not alter the results of the impact determination.</p> <p>In addition, SEIR subsection 2.6.4.7 Wildland Fires (page 2-6-23) includes General Plan Policies and mitigation measures intended to address wildland fires, and includes Policies LU-6.11, LU-11.2, S-3.1 through S-3.4, S-3.6, S-4.1, COS-18.3 and mitigation measures Haz-4.1 through Haz-4.4. These Policies and mitigation measures support fuel management / modification programs that balance the need to protect structures with the preservation of native vegetation. The programs, identified below, have been reviewed and coordinated with County Fire Authority</p> <ul style="list-style-type: none"> • County Water Efficient Landscape Design Manual

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		<ul style="list-style-type: none"> ○ Appendix G provides a plant list that identifies ignition resistive plants, both native and non-native. <i>(Note: Species were cross checked with the California Native Plant Society when this manual was prepared.)</i> ○ Appendix H provides a list of plants to avoid. Two native species (sagebrush and chamise) are identified as undesirable and all others are non-native. ● County web site includes a web page with a brochure titled Fire, Defensible, and You that identifies fire resistant landscaping. <p>The Water Efficient Landscape Design Manual is being updated to be consistent with the County's recently approved amendments to the Water Conservation in Landscaping Ordinance. This update will include an update to the Design Manual's Appendix H to include all plant species listed in the Fire, Defensible Space and You brochure. (See also Response to Comment S-14.)</p>
S-9	<p>We also strongly suggest that the County coordinate with local fire districts, the County Fire Authority, and CAL-FIRE, to determine whether the wildfire section in the document is up-to-date. We are hearing that major changes are being proposed (possibly to shift strategy from wide-scale clearances to fire-safe landscaping to protect live and property). <i>If</i> such changes are underway, the FCI GPA should mirror them, rather than using outdated guidance.</p>	<p>This comment generally requests the County coordinate with fire agencies to determine if the mitigation identified in SEIR subsection 2.6.4.7 Wildland Fires is "current." Staff confirmed with the County Fire Authority and determined that the wildfire section is up to date. The County disagrees with the comment that the current strategy is for "wide-scale clearances." SEIR subsection 2.6.4.7 includes mitigation measure Haz-4.3 to enforce and comply with the Fire Code. Below is an excerpt from Section 4907.2(a) of the County Consolidated Fire Code (see page 53), identifying the fuel modification requirements for a structure intended for human habitation. This requirement is consistent with the strategy being proposed by the comment. The 100 feet of defensible space is also consistent with the California Public Resources Code and the County is not aware of any proposed changes.</p> <p>"The area within 50 feet of a building or structure shall be cleared of vegetation that is not fire resistant and re-planted with fire-resistant plants. In the area between 50 to 100 feet from a building, all dead and dying vegetation shall be removed. Native vegetation may remain in this area</p>

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		<p>provided that the vegetation is modified so that combustible vegetation does not occupy more than 50% of the square footage of this area.”</p> <p>The County Consolidate Fire Code is available at: http://www.sandiegocounty.gov/content/dam/sdc/dplu/docs/cosd-fire-code.pdf</p>
S-10	<p>Brush management zones should not be included in conservation areas. Too often, development goes up to property lines, and adjacent conservation areas are expected to bear the brunt of brush management to protect the new development, even when this impacts conservation goals. Buildings should be set back from the wildland-urban interface, so that the brush management areas are completely within the property boundary; . brush management should not be forced onto natural conservation areas because “managing” the brush reduces the value of the habitat. We suggest that Hazards Policy S-41 be amended to include language to this effect.</p>	<p>This comment generally recommends revising Policy S-4.1 to add language that brush management should not be forced into natural conservation areas. If a project is approved with Biological Open Space as a requirement for preservation or mitigation, then brush management activities (vegetation removal) are prohibited without direct written authorization from the local fire authority. Additionally, when defensible space is required for a project, that defensible space, typically 100-feet from habitable structures, is not included in the Biological Open Space. Therefore, the County does not agree the current Policy of S-4.1 warrants amendment.</p> <p>SEIR subsection 2.6.4.7 recognizes the potential impacts of extensive fuel modification around development in the WUI, as discussed in the fourth dot point, which determines that requiring extensive fuel modification “would be infeasible because it would substantially impact the environment by damaging biological resources.”</p> <p>See also Response to Comment S-9.</p>
S-11	<p>The current draft is incomplete with regards to vegetation impacts. While it lists the acres of habitat that will be impacted, Table 2.4-1 needs three more columns. First, we need to see how many acres of that habitat are within the proposed FCI footprint.</p>	<p>The FCI Lands GPA is programmatic and not a true development proposal for which the County can determine the exact level of impact and mitigation. Nevertheless, in an effort to be responsive to the comment, SEIR Table 2.4-1 has been updated to include total acres of vegetation under each vegetation category within the Project areas. The additional information merely clarifies and does not change the impact determination or cause additional mitigation to be developed.</p>
S-12	<p>Second, we need to see how many of those acres are available for mitigation,</p>	<p>This comment requests an accounting of acres of each vegetation type available for mitigation. The FCI Lands GPA is programmatic and not a true development proposal for which the County can determine the exact level of impact and mitigation. Nevertheless, the following is provided in an effort to be responsive to the comment. The</p>

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		<p>number of non-impacted acres within the Project area would be determined by subtracting from the total number of acres of each vegetation type shown in the updated SEIR Table 2.4-1. However, this calculation would not account for opportunities for off-site mitigation which is permissible. All of the undeveloped land would be available for mitigation should the property owner choose to. Therefore, the County does not agree this information is necessary to determine the significance of impacts or feasible mitigation. The SEIR determined that the proposed Project's impacts to Special Status Plant and Wildlife Species (Section 2.4.3.1) and impacts to Riparian Habitat and Other Sensitive Natural Communities (Section 2.4.3.2) would be significant and unavoidable until habitat conservation plans are completed. See also Response to Comment S-11.</p>
S-13	<p>and third, we need to see the mitigation ratio for each vegetation type, and ideally the total amount of acres that would need to be mitigated for each vegetation impact. Thus, we can determine which vegetation impacts the County can mitigate for using current or future mitigation banks, and which are significant, unavoidable impacts that cannot be mitigated. This information is critical to land use decisions going forward, and the FCI GPA is an ideal document in which to house this information.</p>	<p>This comment requests the mitigation for each vegetation type and the total number of acres that would be required to mitigate for each vegetation type. The FCI Lands GPA is programmatic and not a true development proposal for which the County can determine the exact level of impact and mitigation. Mitigation ratios for each type of vegetation within the approved MSCP Subarea are provided in Attachment M of the County Biological Mitigation Ordinance. The mitigation ratio also takes into account the quality of the vegetation (habitat) when determining the final mitigation ratio. The South County MSCP is currently the only approved MSCP within the Project area; therefore, these ratios would not apply to areas outside the South County MSCP. The mitigation ratios are applied to development projects, not to a "Program" such as the proposed Project. Table 2.4-1 provides the estimated impacted acres. Certainty in the acres of potential mitigation is not necessary to determine the significance of potential impacts to candidate, sensitive, or special status species.</p>
S-14	<p>Additionally, the County needs to help support monitoring of wildlands, especially wetlands, for new pests, pathogens, parasites, and invasive plants. Currently, this function is performed by a tiny staff of state agriculture specialists, contractors, personnel from various groups, and volunteers. Given the damage caused by newly</p>	<p>The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. The comment is generally discussing existing conditions; not the perceived impacts of the proposed</p>

<p>spreading pests like the polyphagous shot-hole borer, which attacks many wetland trees <i>and</i> avocados and landscaping trees, the County needs to get involved in supporting efforts to detect, monitor, and control these problems, as existing efforts are inadequate. We suggest that language to that effect be included both in the Biology section (2.04) and in the Hazard section (2.06), and we are happy to work with staff on wording, if desired.</p>	<p>Project. However, the County has provided a response to the concern below.</p> <p>The County Agriculture, Weights and Measures Department helps support the concerns raised by this comment by:</p> <ul style="list-style-type: none"> • Ensuring the safe use of pesticides and investigate illnesses; • Preventing the establishment of pests that require pesticide controls, sting or severely injure people, or inhibit growing fresh nutritious fruits, vegetables and other plants; and • Promoting the use of effective biocontrol measures. <p>However, the County does not have authority over privately-owned lands to monitor those lands for pests, pathogens and parasites. Section 2.4.4 of the SEIR includes mitigation to minimize impacts of invasive plants, as shown below.</p> <ul style="list-style-type: none"> • Policy COS-1.9: Invasive Species. Require new development adjacent to biological preserves to use non-invasive plants in landscaping. Encourage the removal of invasive plants within preserves. • Bio-2.1 Revise the Ordinance Relating to Water Conservation for Landscaping to incorporate appropriate plant types and regulations requiring planting of native or compatible non-native, non-invasive plant species in new development. <p>The Water Conservation in Landscaping Ordinance was recently amended to be compliant with the State's Model Water Efficient Landscape Ordinance (MWELo). This Ordinance restricts plant types in fire prone areas and adjacent to native vegetation. This would be identified during review of discretionary project applications, along with any new construction where the landscaped area is 500 square feet or more in which the County issues a building permit. Invasive plantings adjacent to native species and those that may be transported through area storm drain outlets into adjacent open spaces are closely looked at during review. Fire prone vegetation adjacent to native open space areas is also restricted. Projects adjacent to MSCP Preserves go through the same level of review and concurrence between the staff landscape architect and biologists to ensure no invasive or fire prone vegetation will negatively impact</p>
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		adjacent habitats. (See also Response to Comment S-8.)
S-15	<p>With regard to global climate change, we have the following concerns and suggestions:</p> <p>-As CNPS was a co-plaintiff in the <i>Center for Biological Diversity et al. vs. California Department of Fish and Wildlife and Newhall Land and Farming Company</i> case ("Newhall Ranch"), we have to note that this case must be included in any analysis of climate change impacts, as it restricts what both the County and applicants may do. Specifically, the County's use of "900 metric tons carbon dioxide equivalent per year (MT CO₂e/year) screening level to determine the need for additional analysis of GHG [greenhouse gas] emissions from a project," (p. 2.15-11) is not explicitly allowed under the ruling, and it may well face a future court challenge.</p>	<p>The Newhall Ranch Case does not restrict the County's use of 900 MT CO₂e/year as a screening threshold to determine which projects do not pose a cumulatively considerable emission risk. The Newhall Ranch ruling does not disallow the use of the screening threshold as the comment claims. Please refer to Global Response 3 (GR-3) Global Climate Change.</p>
S-16	<p>This is additionally true, because, per the County's 2015 <i>Recommended Approach to Addressing Climate Change in CEQA Documents</i>, it is allowable to "amortize" GHG emissions over a fifty year period. In practice, this means that projects that emit up to 45,000 MT CO₂ the year they are built are proposed to have insignificant greenhouse gas impacts, because their emissions are amortized over 50 years and therefore considered to be (wrongly) insignificant in the year they are actually emitted. We strongly urge the County to reconsider both its numerical threshold and especially amortizing emissions that will occur in a known year, to insure that this policy is consistent with the Newhall Ranch ruling. This is an observation, not a threat. The County needs to insure that its guidelines can pass foreseeable legal challenges, so that project permits will not be invalidated by legal challenges to the way the County advises that greenhouse gas emissions are handled. Complying with the Newhall Ranch ruling is essential going forward.</p>	<p>The Newhall Ranch case underscores that GHG analysis, like all resource analyses, must include substantial evidence regarding the level of significance (impact significance) determination. Furthermore, the County's guidelines for addressing Climate Change were rescinded by the Board of Supervisors in June 2015. The County is currently working on developing interim guidance for a GHG Analysis Methodology in light of the Newhall decision, and that interim guidance is anticipated to be used until a Climate Action Plan is adopted by the County. Please refer to Global Response 3 (GR-3) Global Climate Change.</p>
S-17	<p>The County has missed one major source of CO₂ emissions: cement manufacture. The manufacture of one MT of conventional Portland cement emits between 0.9 and 1.1 MT of CO₂, and concrete can be up to 40% cement, although proportions vary substantially. The</p>	<p>This comment suggests that the FCI Lands GPA SEIR needs to assess GHG emissions from cement manufacture. The County disagrees that cement manufacture emissions should be included in the SEIR Appendix F, GHG Emissions Calculations. While it is true that</p>

	<p>County needs to include cement emissions in assessing impacts. Methods for assessing emissions from cement production are available from the IPCC2 and many other sources. One benefit of considering cement emissions is that the industry is trying to decrease cement emissions. Accounting for them is one way to encourage adoption of materials that emit less (or even absorb!) greenhouse gases.</p>	<p>development of projects contemplated under the GPA is likely to require the use of cement, emissions associated with manufacture of cement that would ultimately be required for an individual land use development are considered part of a “lifecycle” emissions analysis. CEQA does not require a lifecycle analysis of a project’s emissions. CEQA only requires analysis of impacts that are directly or indirectly attributable to the project under consideration (CEQA Guidelines, Section 15064(d)). “Lifecycle” emissions would refer to emissions beyond those that could be considered indirect effects of a project as that term is defined in CEQA Guidelines Section 15358. In some instances, materials may be manufactured for many different projects as a result of general market demand, regardless of whether one particular project proceeds. Thus, such emissions may not be caused by the project under consideration. The California Natural Resources Agency affirmed this in the Final Statement of Reasons for Regulatory Action supporting the Amendments to the State CEQA Guidelines Addressing Analysis and Mitigation of Greenhouse Gas Emissions Pursuant to SB97 (December 2009). The Agency states that a regulatory definition of the term “lifecycle” does not exist and even if a standard definition of the term existed, requiring such an analysis may not be consistent with CEQA for the reasons stated above. Moreover, cement manufacture facilities represent “covered entities” under California’s Cap-and-Trade regulation and are subject to a specified emissions allowance and a declining emissions cap to reduce emissions in compliance with the State’s GHG reduction goals. As such, any emissions from cement manufacture that ultimately supplies a project would be heavily regulated under the State’s GHG reduction framework. No further analysis of such emissions is required in the Draft SEIR.</p>
S-18	<p>We strongly urge the County to abandon the 50 year amortization concept for greenhouse gas emissions. The critical threshold is 2oC warming on average global temperatures, and absent a major transformation of global civilization, we will pass that threshold in something like 20 years, not 50. At that point, the County faces major challenges. These include, in no particular order, loss of</p>	<p>This comment urges the County to abandon the 50-year amortization period for GHG emissions. Project construction emissions are typically amortized for 20 years, not 50. If a project amortizes their construction emissions beyond 20 years, a rationale must be presented to substantiate the need and viability of the longer duration amortization. In addition, the County is not bound to a</p>

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	Colorado River water due to reservoir levels falling below intake pipes, loss of electrical power from Colorado River dams for the same reason, decreased water from California sources due to expected decade-long droughts (as we appear to be in now), major die-offs in agricultural crops, major die-offs of plants at the hotter ends of their geographic ranges, smaller and less predictable food supplies, and quite possible major human emigrations as San Diego becomes less hospitable.	threshold of 2 degrees Celsius as a significance criteria for determining the severity of climate change impacts.
S-19	Unfortunately, many major developers and many planning groups view the transformation to a decarbonized society as a threat to their way of life, rather than as a wonderful business opportunity to get rich saving the world, while building a livable future through invention, design, public engagement, and innovation. While changing peoples' world-view is beyond the scope of any planning document, we hope that the County can embrace the future and the need to transform, rather than endlessly tinkering with increasingly outdated 20th Century notions of planned sprawl that are increasingly maladaptive in our changing world. This is not to say that the FCI GPA should be thrown out, but we hope that the people involved in it can be encouraged to embrace both present reality and future challenges, rather than trying to replicate the worn-out plans of the past.	The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
S-20	Thank you for the opportunity to comment on the FCI GPA. If you have any questions, comments, or concerns, please contact Frank Landis at 310-883-8569 (cell) or conservation @cnpssd.org. Please keep us informed of all future announcements, meetings, and documents related to this project.	This comment provides concluding remarks; a response is not required.

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T-1	We submit this letter on behalf of the Cleveland National Forest Foundation ("CNFF"), which promotes sustainable regional land use planning in order to stem the tide of urban encroachment into San Diego's backcountry. On behalf of CNFF, we submit these comments on the Recirculated Draft Supplemental Environmental Impact Report ("RDSEIR") for the Forest Conservation Initiative General Plan Amendment ("Project" or "FCI Amendment").	This comment is an introduction to comments that follow. No further response is required.
T-2	For all the reasons set forth below, it is our opinion that the RDSEIR does not comply with the requirements of the California Environmental Quality Act ("CEQA") (Public Resources Code section 21000 <i>et seq.</i>) and CEQA Guidelines (California Code of Regulations, title 14 section 15000 <i>et seq.</i>).	This comment is further introduction to comments that follow. No further response is required.
T-3	The Forest Conservation Initiative is a voter approved initiative that required 72,000 acres of backcountry lands within the Cleveland National Forest to be designated with minimum lot sizes of 40 acres. Since the sunset date of the FCI Initiative, CNFF and Save Our Forest and Ranchlands ("SOFAR") have submitted comments to the County on previous iterations of this EIR that pointed out the documents' inadequacies. Unfortunately, this document perpetuates many of its predecessors flaws, particularly its failure to adequately analyze and mitigate the Project's severe climate impacts and its treatment of alternatives to the proposed Project.	The County recognizes that CNFF submitted comments on the previous iteration of this Draft SEIR circulated for review in 2013. As detailed in the Reader's Guide for Recirculation, comments on the 2013 Draft SEIR will not be responded to as the current Draft SEIR was updated. The County appreciates the comments received on the current Draft SEIR. However, the County does not agree that the current Draft SEIR is inadequate as it does contain an analysis of the potential impacts of climate change within subsection 2.15 and a reasonable range of alternatives have been developed and analyze within Chapter 4, Project Alternatives.
T-4	The proposed Project, in effect, expands the Village land use designations (formerly known as "country town" designations) outside of the established boundaries for the Village areas. Implementation of the Project will allow development to further encroach into stressed, fragile ecosystems within the Cleveland National Forest. This encroachment is not justified, especially given that the RDSEIR itself identifies the Modified FCI Condition alternative as reducing encroachment into forest areas and as environmentally superior. See RDSEIR at S-7 and 4-2.	This comment generally states the commenter's interpretation of the proposed Project; however, it does not make specific contentions regarding the substantive analysis within the Draft SEIR. Nevertheless, the County has responded to this comment below. The proposed Project does expand Village land use designations outside current Village boundaries in Ramona, Descanso and Alpine. However, the County does not agree that this expansion of Village designations is not justified. In both Ramona and Descanso, the Village land use designations reflect existing parcels sizes and do not allow any further subdivision potential. In Alpine, the expansion of Village land use designations would create a more self-sufficient village with a population that can support a wider range of employment opportunities and services. The Village expansion primarily supports

		<p>Project objectives as discussed below.</p> <ul style="list-style-type: none"> • <i>Promote sustainability by locating new development near existing infrastructure, services, and jobs</i> – The proposed Alpine village expansion is proposed along the Interstate 8 corridor directly east of where services and jobs are already located, and to the east of the Viejas retail and gaming complex, a major employer for the area. • <i>Reinforce the vitality, local economy, and individual character of existing communities while balancing housing, employment, and recreational opportunities</i> – The proposed expansion of the Alpine Village will allow for the provision of a wider range of services, including a new high school, which will contribute to a more complete and self-sufficient community. • <i>Maintain environmentally sustainable communities and reduce greenhouse gas emissions that contribute to climate change</i> – The expansion of the Alpine Village will contribute to development of a more multi-modal transportation network and allow for a more complete and self-sufficient community, as discussed above, both of which will contribute to a reduction in vehicle miles traveled. <p>The FCI Lands GPA does not propose land uses within the Cleveland National Forest (CNF). Uses resulting from the GPA may cause activities that encroach into off-site (non-Project areas) areas; potential indirect effects caused by the GPA are analyzed throughout the SEIR wherein potential impacts are disclosed and General Plan Policies and mitigation measures are identified. See Responses to Comments R-16, R-17, R-18, and O-8.</p> <p>It should also be noted that the Modified FCI Condition alternative also contains the proposed expansion of village land use designations.</p>
T-5	<p>We see no reason why the County should be considering the proposed Project when there is clearly an environmentally superior option. New development can and should be accommodated inside the Village designated areas so that open space and forest land values can be preserved.</p>	<p>This comment generally reflects the commenter's preference of an alternative that should be implemented; however, it does not raise any issues concerning the sufficiency of the Draft SEIR's analysis.</p> <p>Nevertheless, the County has responded to this comment below. The Draft SEIR acknowledges that the Modified FCI Condition Alternative would reduce potential impacts when compared to the proposed Project, as it would accommodate less development than</p>

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		<p>the proposed Project and all of the other alternatives, thus decreasing environmental impacts in all issue areas evaluated in Chapter 2.0 of this SEIR. See Responses L-3, L-4, and GR-1. The Modified FCI Condition alternative proposes reduced density designations in Alpine, both east of the Village and in the Japatul Valley area (SEIR Figure 4-1.1A), Cuyamaca (SEIR Figure 4-1.3), Descanso (SEIR Figure 4-1.4), Jamul (SEIR Figure 4-1.6), Julian (SEIR Figure 4-1.7), Lake Morena (SEIR Figure 4-1.8) and Palomar Mountain (SEIR Figure 4-1.10). As shown in SEIR Table 4-4, the lower density designations proposed by the Modified FCI Condition would reduce the potential buildout of the land use map by 1,724 dwelling units, 1,683 of which are located in Alpine, where the proposed Project would expand the Alpine Village in support of the Project objectives discussed in Response to Comment T-4. In all other communities (totaling 57,967 acres), which are the more remote and in closer proximity to CNF lands than Alpine, the proposed Project would result in a potential buildout of 41 more dwelling units than the Modified FCI Condition alternative. The proposed Project reflects stakeholder consensus after considering the recommendations and interests of a wide range of stakeholders.</p>
T-6	<p>As previously submitted, CNFF requests that the County create a “forest” designator overlay district that would apply to all lands regardless of parcel size within the FCI planning area. See September 16, 2014 letter from SMW to B. Citrano and M. Fogg, attached as Exhibit A. As you know, CNFF supports minimum parcel sizes of at least 40 (or 80) acres outside country towns (villages) to protect forest values. The “forest” designator would serve as a “red flag” for landowners that seek to develop or subdivide properties in excess of the adopted FCI Amendment land use designations. The “forest” designator is fully consistent with the San Diego County Guiding Principles and would specifically reinforce Guiding Principles 2 (compact development within Village boundaries), 3 (vitalize existing communities), 4 (habitat protection), 5 (wildfire risk), 6 (promote public transportation), 7 (reduce greenhouse gas emissions), 8 (preserve agriculture), and 9 (reduce infrastructure costs).</p>	<p>This comment proposes a “forest” designator overlay district for all lands within the FCI planning area. This comment does not raise any issues concerning the sufficiency of the Draft SEIR’s analysis. Nevertheless, the County has responded to this comment below and it will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. It is acknowledged that CNFF has previously proposed the creation of a “forest” designator overlay district that would apply to all FCI Project areas. It is not clear from this comment as to what impacts would be reduced or mitigated through the application of this overlay; regardless of a “forest overlay”, future development within the FCI Project areas would still meet all applicable County building codes and development regulations and standards.</p>
T-7	<p>This Project will have long-term consequences for the residents of San Diego County’s backcountry and for the ecological health of the</p>	<p>Please see Global Response 3 (GR-3). The County does not agree that the Draft SEIR failed to adequately analyze the significant impacts</p>

<p>Cleveland National Forest. Those consequences include permanent loss of open space, increased edge effects, significant increases in traffic congestion, and increased air pollution and greenhouse gas emissions (“GHG”). Yet, this RDSEIR fails to adequately analyze and mitigate these significant impacts.</p>	<p>identified in this comment; feasible mitigation has been identified and for some resource subjects the impacts are considered less than significant, for other resources, the impacts cannot be mitigated to a level of less than significant. Please refer to SEIR Table S-2 for a summary of impacts, applicable General Plan policies and feasible mitigation measures and the resulting impact after consideration of these policies and mitigations. The following identifies where these impacts are analyzed in the Draft SEIR for the resources addressed in this comment:</p> <ul style="list-style-type: none"> <p><i>Permanent loss of open space</i> — The former FCI lands are privately-owned lands, not open space. Therefore, the proposed Project would not result in any loss of open space. However, the Draft SEIR did analyze impacts to agriculture lands and forest resources in subsection 2.2.3.2, Conflicts with Agricultural or Forest Lands. In addition, the impacts to agriculture and forest resources are analyzed in Chapter 4 (see Table 4-6. Comparison of Alternatives – County Identified Agricultural Lands and Impact Estimates and Table 4-7. Comparison of Alternatives – Proposed Land Uses in Forest Resources).</p> <p>The mitigation for those impacts is identified in SEIR subsection 2.2.4. In subsection 2.2.4.4, the Draft SEIR determined that even with implementation of the applicable mitigation measures any direct conversion of forestry resources due to private development of parcels within the Project areas addressed in this SEIR would remain significant and unavoidable.</p> <p><i>Increased edge effects</i> — Impacts to edge effects are addressed in Draft SEIR subsection 2.4.3.2 (<i>refer to last paragraph on page 2.4-5</i>). Project alternatives are analyzed in Chapter 4 (see Table 4-9 Biological Resources Impacts Comparison).</p> <p>In addition, Policies identified on pages 2.4-10 to 2.4-11 and 2.4-13 require monitoring, management and maintenance of regional preserve systems to help minimize edge effects. Mitigation measure Bio-1.7 specifically addresses edge effects</p>
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		<p>(see page 2.4-12).</p> <p>As discussed in subsection 2.4.3.2 (page 2.4-4), impacts to Riparian Habitat and Other Sensitive Natural Communities would be reduced through the implementation of a combination of mitigation measures and implementation programs identified in the General Plan Update PEIR; however, not to a level of insignificance.</p> <ul style="list-style-type: none"> • <i>Traffic congestion</i> — The Draft SEIR uses level of service (LOS) as a means to analyze traffic congestion impacts. LOS impacts are analyzed in subsection 2.13.3.1 and shown in Tables 2.13-1 through 2.13-7, as well as in Appendix D Technical Memorandum: Traffic Impact Assessment Comparison of Traffic Impacts:2015 to 2012 Proposed Projects. In addition, traffic impacts for the Project alternatives are analyzed in Chapter 4, Table 4-12, as well as Appendix E Technical Memorandum: Traffic Impacts- Comparison of SEIR Alternatives. <p>Policy M-1.2 is identified in the Draft SEIR to reduce traffic congestion, along with regulations intended to require projects to provide adequate off-street parking and loading, thereby reducing traffic congestion (see page 2.13-9).</p> <p>As shown in the analysis within subsection 2.13.3.1 Traffic and LOS Standards, the Draft SEIR analysis determined that Alpine would be the only community with a potential for significant traffic-related impacts (see page 2.13-3, last paragraph).</p> <ul style="list-style-type: none"> • <i>Air quality</i> — Impacts to air quality are analyzed in the Draft SEIR in subsections 2.3.3.1 Air Quality Plans, 2.3.3.2 Air Quality Violations, 2.3.3.3 Non-Attainment Criteria Pollutants and 2.3.3.4 Sensitive Receptors, along with Appendix C Air Quality/Global Climate Change Analysis. In addition, air quality impacts for the Project alternatives are analyzed in Chapter 4, Table 4-8, Area-Wide and Mobile Source Emissions Alternatives Comparison. <p>The Draft SEIR subsections 2.3.3.2, 2.3.3.3 and 2.3.3.4 determined that impacts would be reduced through regulations, County policies and mitigation</p>
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		<p>measures/implementation programs; however, even with these programs in place, the impacts would not be reduced to below a level of significance because future development would exceed established quantitative screening-level thresholds (SLTs).</p> <ul style="list-style-type: none"> • <i>Greenhouse gas (GHG) emissions</i> — Impacts from GHG emissions are analyzed in the Draft SEIR subsections 2.15.3.1 and 2.15.3.2. In addition, impacts from GHG emissions by Project alternatives are analyzed in subsections 4.2.2.15 (Modified FCI Condition), 4.3.2.15 (Mid-density), 4.4.2.15 (Alpine Alternative Land Use Map) and 4.5.2.15 (No Project). Please see Global Response 3 (GR-3). <p>The Draft SEIR subsection 2.15.3.1 determined that because development would generate substantial GHG emissions, regardless of the land use map alternative ultimately approved by the County, and because it currently cannot be known if the Project would comply with GHG targets after 2020 in the range of an additional 40 to 80 percent reduction, the potential exists that post-2020 emissions may contribute considerably to cumulative carbon emissions that promote further climate change; therefore, this impact would be potentially significant and unavoidable. See Global Response 3 (GR-3).</p>
T-8	Moreover, prolonged drought conditions have exacerbated limited water supplies in the backcountry. Despite these changed circumstances, the RDSEIR relies on the General Plan EIR's analysis of water supply impacts and fails to analyze current conditions.	<p>Although the Draft SEIR does partially rely on the analysis within the General Plan EIR for the issue of water supply, it includes updated information related to this issue.</p> <p>The Draft SEIR subsection 2.7.3.2 determined that implementation of the proposed Project would result in significant and unavoidable direct and cumulative impacts related to groundwater supplies and recharge. Figure 2.7-2, based on 2014 data, shows areas with Potential Low Well Yields that reflect similar conditions of the current extended drought conditions and are located in groundwater dependent areas.</p> <p>The Draft SEIR subsection 2.7.3.2 recognizes that the Project areas are located where groundwater supplies are already depleted (see second paragraph on page 2.7-5).</p> <p>Additionally, the General Plan Update PEIR (subsection 2.15.4.2) recognized the currently limited water supply infrastructure that will</p>

		result in impacts to water supply. Impacts from limited water supply are expected to be more severe for the FCI Lands GPA proposed Project as compared to the 2011 General Plan due to the proximity of the FCI Lands Project areas and surrounding sensitive natural resources (<i>see last paragraph on page 2.15-31 of the SEIR</i>).
T-9	<p>The RDSEIR Fails to Adequately Analyze or Mitigate Climate Change Impacts.</p> <p>The FCI Amendment would accommodate 6,245 new units at build-out, which would significantly increase the population in San Diego's backcountry. RDSEIR at 1-15. It is therefore unsurprising that the RDSEIR concludes that the Project will have a significant effect on climate change. RDSEIR at 2.15-16 and 2.15-20. With this significance determination comes CEQA's mandate to adopt feasible mitigation measures that would reduce or avoid the impact. CEQA Guidelines § 15126.3(a)(I); see also <i>Woodward Park Homeowners Ass'n, Inc. v. City of Fresno</i> (2007) 150 Cal. App. 4th 683,724 ("The EIR also must describe feasible measures that could minimize significant impacts."). Under CEQA, "public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects." <i>Berkeley Keep Jets Over the Bay Comm. v. Bd. of Port Comm'rs</i> (2001) 91 Cal.App. rh 1344,1354 (quoting Pub. Res. Code § 21002). Accordingly, CEQA requires lead agencies to identify and analyze all feasible mitigation, even if this mitigation will not reduce the impact to a level of insignificance. CEQA Guidelines Section 15126.4(a)(I) (A) (discussion of mitigation "shall identify mitigation measures for each significant environmental effect identified in the EIR").</p>	<p>The comment is correct that full buildout of the Project area under the proposed Project would result in 6,245 potential dwelling units. However, Table 1-1C has been added to the SEIR Chapter 1 to show that of the 6,245 potential dwelling units, only 2,470 of those dwelling units would result from the potential subdivision of existing parcels. The remaining 3,775 of potential dwelling units would be located on existing parcels that are either already developed or would have the same potential to develop with or without the FCI Lands GPA. Table 1-1C further shows that, when the Alpine CPA is removed from consideration, there are only 245 potential additional lots available through subdivision in the remainder of the Project area (56,738 acres).</p> <p>The County does not consider the Alpine CPA part of the "backcountry", as referenced in this comment. The Alpine CPA is bisected by Interstate 8, supported by a mixed-use Village with urban densities and contains additional urban-level development on the Viejas Reservation. Most of the additional development capacity in the Alpine CPA for the proposed Project would be located as a linear continuation of the Alpine Village along Interstate 8 and in the vicinity of the urban level development on the Viejas Reservation. Applicable General Plan Policies and feasible mitigation measures that address climate change are found within subsection 2.15.4, which also includes the identification and evaluation of additional mitigation measures that have been determined to be infeasible.</p>
T-10	<p>Here, the RDSEIR's analysis of the Project's impacts on climate change fails to meet the requirements of CEQA because it fails to propose feasible mitigation measures to reduce the Project's significant impacts on climate change. Instead, the RDSEIR states that there are no feasible mitigation measures beyond the General Plan policies already identified. RDSEIR 2.15-16 and 2.15-17. This is simply not true. Because the Project's GHG emissions will cause a significant</p>	<p>The County does not agree with the comment. Applicable General Plan Policies and feasible mitigation measures that address climate change are found within subsection 2.15.4, which also includes the identification and evaluation of additional mitigation measures that have been determined to be infeasible. The Draft SEIR determines and discloses there are no feasible mitigation measures beyond General Plan policies already identified. On page 2.15-17, the Global Climate</p>

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	<p>impact, the RDSEIR must analyze, and the County must adopt, <i>all</i> feasible mitigation to reduce those impacts.</p>	<p>Change chapter states that additional feasible mitigation measures cannot be identified at this time, not that there are none available. The rationale provided in this chapter is that important factors, including the cost and feasibility of mitigation actions needed to comply with future policies, are currently unknown, such as:</p> <ul style="list-style-type: none"> • GHG emission reduction targets in effect at the time that subdivision maps are submitted for approval; • The effectiveness of regulatory actions already adopted as part of the implementation of the Global Warming Solutions Act of 2006 (AB 32); and • The potential for new regulations and their effectiveness related to statutes enacting GHG reduction targets (similar to the current goals in adopted Executive Orders). <p>The County does not agree that the Draft SEIR analysis of Project impacts on climate change fails to meet CEQA requirements because it fails to propose feasible mitigation measures.</p> <p>On September 8, 2016, the California Governor approved Senate Bill 32 (SB 32) which reflects the GHG emission reduction target found in Executive Order B-30-15 and calls for the reduction of statewide emissions to 40% below the 1990 level by 2030. Because this reduction goal mirrors the executive order and the County's analysis anticipated the emission reduction requirement becoming law, the Global Climate Change analysis found in Chapter 2.15 of this SEIR and the associated Appendix F, Greenhouse Gas Emissions Calculations, do not require updating. The analysis was conducted to determine impact significance for the buildout year of 2030 with the significance criteria of 40% of statewide emissions below 1990 levels by 2030.</p> <p>In subsection 2.15.4.1, on pages 2.15-25 to 30, the Draft SEIR explains why specific Project-level mitigation is not feasible due to its social and economically inequitable implementation and because it conflicts with the Project objective to minimize public costs and infrastructure. The overall reduction in residential development potential of the proposed Project will result in reduced GHG emissions compared to current land use designations, regardless of imposed mitigation. Please see Global Response 3 (GR-3).</p>
T-	The RDSEIR concedes that the Project "would generate a substantial	Please see Response to Comment T-10 above. Applicable General Plan

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11	<p>amount of emissions over baseline conditions.” RDSEIR at 2.15-14. The RDSEIR reveals that GHG emissions at build-out will increase to 178,534 million metric tons of carbon dioxide equivalent (MMT CO₂e) annually. The RDSEIR also concedes that the proposed Project “would not meet the GHG standard necessary to comply with the 2020 statewide GHG emissions target” and “it is likely that the Project would not feasibly attain future GHG reductions needed to avoid the most severe climate impacts.” RDSEIR at 2.15-17. Yet, despite the shocking increase in GHG emissions, and acknowledgement that implementation of the Project would mean that GHG targets will not be met, the RDSEIR fails to identify <i>any</i> feasible measures to reduce emissions beyond policies already in place. RDSEIR at 2.15-16 and 2.15-17.</p>	<p>Polices and feasible mitigation measures that address climate change are found within subsection 2.15.4, which also includes the identification and evaluation of additional mitigation measures deemed infeasible.</p>
T-12	<p>Instead the RDSEIR implies that the County is excused from requiring more measures to reduce the Project’s GHG emissions because the GHG emissions reduction goals are only achievable if state and federal authorities adopt new regulations and new technologies are developed.</p>	<p>The County does not agree with the comments’ characterization of the information contained in the Draft SEIR relating to feasible mitigation and General Plan Polices concerning Climate Change. Please see Global Response3 (GR-3) and Response to Comment T-10. Applicable General Plan Polices and feasible mitigation measures that address climate change are found within subsection 2.15.4, which also includes the identification and evaluation of additional mitigation measures deemed infeasible.</p>
T-13	<p><i>Id.</i> However, the California Air Resources Board’s (“CARB”) updated Climate Change Scoping Plan relies on local government actions to “plan and build communities to reduce vehicular GHG emissions and provide more transportation options” as a key strategy to reduce the state’s GHG emissions from transportation systems—which comprise a full 36 percent of total state emissions. Exhibit B, at p. 46. CARB also notes that “[t]he success of efforts to reduce GHG emissions within other economic or resource sectors such as water, energy, and transportation will be greatly improved by a transition to more sustainable land use practices in the years ahead.” <i>Id.</i> at 104. Given CARB’s reliance on local GHG reduction efforts, the RDSEIR may not conclude, as it does, that the ability of the proposed Project to achieve goals beyond 2020 is out of the County’s control. RDSEIR at 2.15-16. <i>See Sierra Club v. Cnty. of San Diego</i>, (2015) 231 Cal.App.4th 1152, 1168 (“without local measures the requirements of Assembly</p>	<p>The Draft SEIR does not state that ability of the proposed Project to achieve goals beyond 2020 is out of the County’s control as claimed by the comment. Page 2.15-16 of the Draft SEIR states that the ability to achieve goals past 2020 is <i>partially</i> out of the County’s control at the individual project level because a specific project-level reduction target has not been adopted by the State Legislature. In the last paragraph on Draft SEIR page 2.15-15, the Draft SEIR states that “[n]ew legislation is proposed to establish post-2020 goals. On September 8, 2016, the California Governor approved Senate Bill 32 (SB 32) which reflects the GHG emission reduction target found in Executive Order B-30-15 (see also Response to Comment T-10)but no action on the legislation has been taken as of September 2015.”</p> <p>As stated in the last paragraph on page 2.15-16, “[i]mplementation of General Plan policies and mitigation measures from the General Plan Update PEIR would reduce the Project’s GHG emissions beyond 2020,</p>

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	Bill No. 32 will not be met”).	but not below a level of significance.” Please see Global Responses 3 (GR-3) and Response to Comment T-10. The County does not agree that local measures are not being pursued to meet the requirements of AB 32. As discussed on page 2.15-29, second to last paragraph, the “...County is undertaking the preparation of a Climate Action Plan (CAP) that will address long-term GHG emissions county-wide.” The CAP is anticipated to provide streamlining opportunities for projects that are determined to be consistent with a “plan for the reduction of greenhouse gases.”
T-14	Accordingly, the County may not avoid mitigating for Project’s significant impacts related to GHG emissions. The RDSEIR must be revised to include feasible mitigations (such as requiring project specific reductions) that result in a demonstrable reduction in emissions.	Please see Global Response 3 (GR-3). Applicable General Plan Policies and feasible mitigation measures that address climate change are found within subsection 2.15.4, which also includes the identification and evaluation of additional mitigation measures deemed infeasible. See Responses T-10 through T-13. Also, as discussed at the end of Draft SEIR page 2.15-29, “...[i]mplementation of the proposed Project will reduce the GHG emissions in comparison to the current land use designations.”
T-15	The RDSEIR dismisses potential mitigations by claiming that they are infeasible. However, the RDSEIR fails to provide evidence for these claims. For example, the RDSEIR states that mitigation requiring project-specific reduction percentages would be infeasible in part because the required reductions “would add development costs and requirements, which <i>could potentially</i> make development, although allowed by the Land Use Map, infeasible.” RDSEIR at 2.15-28 and 29; emphasis added.	The County does not agree that the Draft SEIR does not provide evidence for why specific potential mitigation is infeasible. See Response to Comments T-10 through T-13. Subsection 2.15.4.1, pages 2.15-26 through 2.15-30, provide detailed information showing how requiring Project-specific requirements would be inequitable as it would unfairly place restrictions on parcels only within the Project area; where the proposed Project assigns land use designations to 95% of parcels that either retain existing, or reduce land use intensities. Please see Global Responses 2 and 3 (GR-2, GR-3).
T-16	The RDSEIR provides no evidence to support this statement. It includes no feasibility studies or cost-benefit analyses indicating that implementing such requirements would in fact be infeasible.	The County does not agree that the Draft SEIR does not provide evidence to support the quoted statement. Draft SEIR subsection 2.15.4.1 (pages 2.15-26 through 2.15-30) provides detailed information showing how requiring Project-specific requirements would be inequitable as it would unfairly place restrictions on parcels only within the Project area. For example, the following measure was proposed but ultimately determined to be infeasible: “Require both discretionary and ministerial projects, within the FCI Project areas, to exceed 2013 Title 24 building standards and

	<p>other GHG emission reduction design features to meet quantitative reduction targets consistent with California GHG reduction goals.”</p> <p>The Draft SEIR states that the measure was determined to be infeasible due to its social and economically inequitable implementation, and because it conflicts with the project objective to minimize public costs and infrastructure: Current land use designations for the FCI lands (the No Project alternative) are projected to result in 15,094 dwelling units. The proposed Project land use designations are projected to result in 6,245 dwelling units. The reduction in dwelling units (8,849 fewer dwelling units at buildout of the land use maps) that result from the proposed Project General Plan Amendment is unique in this regard because most GPAs seek to increase development potential.</p> <p>The proposed Project suggests a more intensive land use designation for only 207 of the 4,083 parcels included within the Project areas compared to current designations. There is no change in land use designation for 2,496 parcels and a reduction in land use intensity for the remaining 1,380 parcels. Therefore, the proposed Project either does not change or would reduce the land use intensity for 95% of parcels (95.9% of the Project area acreage) within the Project area. That is, without any additional development potential, projects would be required to implement costly building and design standards that exceed current state recommendations and requirements, and the effectiveness of which to further reduce greenhouse gas emissions has not been conclusively determined, without realizing increased development. In fact, over one-third of the parcels within the Project areas would lose development potential due to the amended (less intense) land use designations of the proposed Project.</p> <p>No economic feasibility or cost-benefit analyses were conducted related to the considered, but deemed infeasible mitigation measure requiring projects within the FCI Lands project areas to exceed the building code/construction standards of Title 24 due in part because the determination of infeasibility was not based on <i>economically infeasibility</i>; instead it was based on <i>economic inequity</i> and conflict with General Plan Policy LU-1.9. Further, achieving the GHG emission reduction targets as established by the State would require all new</p>
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		<p>development, not just development associated with the FCI Lands project area, in addition to the existing built environment and transportation systems to contribute to emission reductions; FCI lands alone cannot achieve the reduction targets. Lastly, as explained in subsection 2.15.4.1 “(r)equiring additional mitigation and analysis for future development projects beyond what is currently required for like projects outside the Project areas is not socially or economically equitable for those properties located within the Project areas because property owners within the Project area would be subject to development costs and requirements beyond those imposed on other property owners.”</p> <p>The Draft SEIR provides additional supporting evidence and ultimately concludes that the overall reduction in residential development potential of the proposed Project will result in reduced GHG emissions compared to current land use designations, regardless of imposed mitigation.</p> <p>Applicable General Plan Policies and feasible mitigation measures that address climate change are found within subsection 2.15.4, which also includes the identification and evaluation of additional mitigation measures deemed infeasible.</p>
T-17	<p>Next, the RDSEIR states that effective mitigation to reduce GHG emissions to a less than significant level for horizon years of 2030 and 2050 would need to be implemented for <i>all</i> projects, which would not be feasible. RDSEIR at 2.15-29; emphasis added. But this statement too is unsupported.</p>	<p>The comment does not accurately reflect the narrative in the Draft SEIR; in the first key-point under Policy LU-1.9 on page 2.15-29, the Draft SEIR reads: <i>“Effectual mitigation to reduce GHG emissions to less than a significant level for the horizon years of 2030 and 2050 would need to be implemented for all projects within the Project areas, even those discretionary development applications (applications) that would normally be processed as ministerial actions. Furthermore, the State has not established a ‘project-level emission reduction’ threshold to determine the project-specific emission reduction percentage necessary for individual projects to meet the 2030 statewide emission reduction target of 40% below 1990 emissions.”</i></p> <p>The point discloses the lack of a state-directed project-level emission reduction target; it does not make a feasible or infeasible determination, although implementation of mitigation that has not yet been developed or evaluated would appear to be infeasible.</p> <p>Ministerial actions are not required to prepare a climate change</p>

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		analysis and are not subject to the same review requirements as subdivision applications. Therefore, it would be infeasible and inequitable to subject ministerial actions to more restrictions or regulations than comparable applications located outside the FCI Project areas. Table 2.15-5 is included in the Draft SEIR to show the types of projects that would typically require a climate change analysis. According to Table 2.15-5, the only projects that require a climate change analysis are single family developments of 50 or more units, multifamily of 70 units or more and commercial office projects 6,300 square feet or more. Table 2.15-6 shows that, within the Project areas, only five parcels for single family and three parcels for multifamily residential would be required to prepare a climate change analysis. See Global Response 3 (GR-3).
T-18	First, as stated above, CEQA requires lead agencies to employ all feasible mitigation measures that would lessen impacts even if the impacts are not reduced to less-than-significant levels. CEQA Guidelines § 15091(a)(1); <i>see also id.</i> § 15126.2(b) (requiring an EIR to discuss “any significant impacts, including those which can be mitigated but not reduced to a level of insignificance.” “A mitigation measure may reduce or minimize a significant impact without avoiding the impact entirely.” 1 Stephen Kostka & Michael Zischke, Practice Under the California Environmental Quality Act § 14.6 (2d ed. 2008).	The comment accurately states pertinent CEQA Guidelines related to feasible mitigation. The comment does not raise any issues concerning the sufficiency of the Draft SEIR’s analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
T-19	Second, the RDSEIR provides no basis for its statement that mitigation would need to be implemented for all projects, including ministerial actions. <i>Id.</i>	Please refer to Response to Comment T-17; see Global Response 3 (GR-3). The County does not agree with this comment. In subsection 2.15.4.1, Table 2.15.6 identifies the number of parcels what would trigger the need to prepare a climate change analysis under five development scenarios: (1) single family residential, (2) multifamily residential, (3) general commercial/office, (4) retail space and (5) supermarket/grocery space. The table shows that, at most, the land use designations assigned by the proposed Project would only trigger a climate change analysis and potentially require additional mitigation on 86 of 4,083 parcels, based on the 900 metric ton screening level from the California Air Pollution Control Officers Association (CAPCOA) white paper. According to the CAPCOA white paper, the 900 metric ton screening level would capture more than 90% of development

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		projects, allowing for mitigation towards achieving the State's GHG reduction goals (refer to the first paragraph on page 2.15-27).
T-20	While requiring identical mitigation for all projects may be preferable from a policy standpoint, the County may certainly impose different forms of mitigation for different types of development. In fact, such an approach makes sense in particular here, when protection of the County's most precious resource, the Cleveland National Forest, is at stake.	<p>This comment generally states the commenter's preference for mitigation, but does not specifically identify what that mitigation is or what impacts it would reduce, nor does it raise any issues concerning the sufficiency of the Draft SEIR's analysis. Nevertheless, the County has responded to this comment below and it will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.</p> <p>The Draft SEIR recognizes that the CNF is a precious resource and this recognition is reflected in the low density land use designations assigned under the proposed Project. See Responses R-16, R-17, R-18, and O-8. SEIR subsection 2.15.4.1, pages 2.15-26 through 2.15-30, provide detailed information showing how requiring Project-specific requirements would be inequitable as it would unfairly place restrictions on parcels only within the Project area; where the proposed Project assigns land use designations to 95% of parcels that either retain existing, or reduce land use intensities as compared to current land use designations. Please see Response T-15 and Global Responses 2 and 3 (GR-2, GR-3).</p>
T-21	The RDSEIR points to the fact that the County is undertaking the preparation of a Climate Action Plan (CAP) that will address long-term GHG emissions County-wide. RDSEIR at 2.15-29.	The comment correctly states that the County CAP is currently under development.
T-22	The RDSEIR implies that because the CAP will address future impacts related to GHG emissions, this EIR's failure to do so is excused.	The County does not agree with this comment. The Draft SEIR does not excuse the County from addressing impacts from GHG emissions. Potential impacts of Climate Change are disclosed and General Plan Policies and feasible mitigation measures are identified in subsection 2.15 of the Draft SEIR. Please see Response to Comments T-7, T-10, T-13 through T-15 and Global Response 3 (GR-3).
T-23	<i>Id.</i> First, it is unclear why the County is moving forward with this General Plan Amendment prior to preparation of a revised CAP. Given that the Project will result in substantial increases in GHG emissions, the County should postpone consideration of this Project until a CAP is prepared that identifies feasible measures that result in meaningful emissions reductions on FCI lands and beyond.	<p>This comment generally discusses the commenter's opinion as to why the Draft SEIR should not have been released, but it does not raise any issues concerning the sufficiency of the Draft SEIR's analysis.</p> <p>Nevertheless, the County has responded to this comment below and it will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.</p>

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		<p>The preparation of land use maps and environmental analysis thereof began just after the County CAP was adopted in June 2012. The FCI Lands GPA Notice of Preparation was circulated from 8/30/12 through 9/28/12, subsequent to CAP adoption. The County CAP approval was set aside in April 2013, which the County appealed. That appeal was not settled until October 2014, a full year after the formal start of the environmental analysis of the FCI Lands GPA. In March 2015, the County learned that the appeal would not be heard by the State Supreme Court. Contrary to the comment, the County began the process of amending the land use designation of the FCI Lands GPA Project areas while a CAP was in place. See subsection 2.15.2.3 for the full discussion of the timing of the CAP and the FCI Lands GPA initiation.</p>
T-24	<p>However, in the absence of a CAP, the County should consider other measures to reduce GHG emissions. For example, The County could impose a moratorium on the development of FCI lands until a CAP is adopted. The County could impose 80-acre minimum parcel sizes outside the Village designated areas and direct more dense development to the more urbanized villages.</p>	<p>The comment proposes two County actions that are inconsistent with CEQA Guideline 15126.6 which requires the description of a reasonable range of alternatives (or measures) that would feasibly attain most of the basic project objectives and would also avoid or substantially lessen any of the significant effects of the Project. The first suggested action is the imposition of a building moratorium until the County CAP is adopted for the FCI Lands GPA Project areas. A moratorium would not be consistent with any of the Project objectives. Further, within Chapter 4 of the Draft SEIR, the considered but rejected “Reduced Development/No Build Alternative” was analyzed. The second suggested action is the designation of all FCI Project areas with Rural Lands 80 land uses. This suggestion too is inconsistent with the basic objectives of the FCI Lands GPA, particularly the designation of land uses consistent with the Community Development Model. The arbitrary designation of FCI Lands GPA Project areas with RL-80 designations is similar to the considered but rejected “FCI Density Alternative” which arbitrarily places RL-40 designations on parcels within the Project areas. Delaying consideration of the Project until a CAP is adopted would continue to allow for more development potential than would be allowed once the proposed Project or any of the project alternatives are adopted. Please see Global Responses 2 and 3 (GR-2, GR-3).</p>
T-	<p>Alternatively, the County could implement interim policies that apply</p>	<p>The suggested interim measures aimed at reducing GHG emissions are</p>

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25	to development on FCI lands until a CAP is adopted. Given the changed circumstances of prolonged drought conditions, limited water supplies, and increased wildfire risk, the County has every reason to give serious consideration to these mitigation measures.	addressed in Response to Comment T-24. Given two Project alternatives, as described in Chapter 4 of the Draft SEIR, specifically the “Reduced Development/No Build Alternative” and the “FCI Density Alternative” were considered and analyzed, but found infeasible, the County contends that the potential suggested action proposed by the comment were seriously considered.
T-26	Furthermore, the County has not demonstrated that the General Plan Measures the RDSEIR relies on can be enforced or will result in necessary emissions reductions, in violation of CEQA’s requirements for enforceable and efficacious mitigation measures.	The County does not agree with the comment that the General Plan Policies and mitigation measures are not enforceable and do not result in GHG emission reductions. As identified in subsection 2.15.4, there are many General Plan Policies and mitigation measures that are in effect and are reducing emissions. General Plan policies are also legally binding and development approvals must be consistent with those policies. The County is currently developing a Climate Action Plan that will apply throughout the entire unincorporated lands of San Diego County. See also Response to Comment T-28.
T-27	Mitigation measures proposed in an EIR must be “fully enforceable” through permit conditions, agreements, or other legally binding instruments. Pub. Res. Code § 21081.6(b); CEQA Guidelines § 15126.4(a)(2).	The comment accurately states pertinent CEQA Guidelines related to feasible mitigation. The comment does not raise any issues concerning the sufficiency of the Draft SEIR’s analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
T-28	The RDSEIR relies on a number of General Plan policies and measures to mitigate significant environmental impacts. See, for example, RDSEIR at 2.15-21-2.15-23. Many of these General Plan policies and programs are vague, optional, directory, or otherwise unenforceable.	Within the context of the FCI Lands GPA, General Plan Policies are analogous to project design features that are intended to address the potential for negative effects prior to environmental analysis, whereas mitigation measures are applied post-analysis in effort to address potential impacts. The comment seeks to require existing General Plan Policies to be subject to CEQA’s requirements for mitigation measures, as set forth in Guideline 15126. The County does not agree this is an appropriate characterization of the policies, which are currently in place and are legally binding, and which apply to private lands within the unincorporated county. Moreover, the County does not agree that General Plan Policies are optional or unenforceable; however, they are not implemented in the same manner as mitigation measures which are captured in a Mitigation Monitoring or Reporting program consistent with CEQA Guideline 15097. These Policies are implemented and enforced through the requirements in the Planning

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		and Zoning Law that development approvals be consistent with the General Plan.
T-29	For example, the RDSEIR relies on General Plan Policy COS-20.2, which calls future preparation of a “program to monitor GHG emissions” as mitigation for any potential impacts related to GHG emissions. RDSEIR at 2.15-21. Because the RDSEIR fails to provide enforceable measures and performance criteria for the proposed measure, there is no assurance the climate change impacts would be mitigated at all. <i>See Sacramento Old City Ass’n v. City Council</i> (1991) 229 Cal.App.3d 1011.	Please refer to Response to Comments T-13 through T-15 and T-28; General Plan Policies are not mitigation measures. In addition, the Climate Action Plan (CAP) is undergoing development, as acknowledged within the Draft SEIR.
T-30	In another example, the RDSEIR relies on Mitigation Measure CC-1.1 which calls on the County to update the County Green Building Program to increase its effectiveness. RDSEIR at 2.15-22. But the RDSEIR fails to provide specific information on what elements of the program would be updated and how the update would result in reduced GHG emissions.	<p>This comment is referencing a mitigation measure that requires the County to update the County Green Building Program. The Green Building Program offers incentives to promote energy efficiency, use of resource efficient construction materials, and water conservation in new and remodeled residential and commercial buildings. The Draft SEIR subsection 2.15.4.1 concludes that compliance with Mitigation Measure CC-1.1 will help the County achieve AB32 goals. Additional information on the Program is available on the County web site at: http://www.sandiegocounty.gov/content/dam/sdc/dplu/docs/pds273.pdf</p> <p>The progress in updating this Program is outlined in the Annual General Plan Progress Reports, which are also available on the web site at: http://www.sandiegocounty.gov/content/sdc/pds/generalplan.html</p> <p>Some improvements to the Program, as reported in these annual reports, include:</p> <ul style="list-style-type: none"> • 2012 – Updated with incentives to reduce plan check turnaround time and fees and eliminated fees for residential photovoltaic systems. • May 2013 – amended Zoning Ordinance to allow greater opportunities for Meteorological Testing facilities and Small Wind Turbine Systems for on-site energy use in conjunction with residential, commercial, or agricultural land uses. • 2014 – County Planning & Development Services expanded its online permit system, particularly the permitting of residential roof-mounted solar photo voltaic. The expanded online

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		<p>services eliminate customer trips to PDS offices, while automation improvements enable faster County review and processing.</p> <ul style="list-style-type: none"> • 2015 – 8,047 residential roof-mounted solar photo voltaics were approved, a 59% increase over the number of permits approved in 2014. There has been a substantial increase in permits issued since adoption of the comprehensive update of the General Plan. This increase in permits issued is greatly attributable to the on-line permitting process established in 2013.
T-31	Similarly, Mitigation Measure CC-1.3 directs the County to “work with SANDAG to achieve regional goals in reducing GHG emissions associated with land use and transportation.” <i>Id.</i> This measure is vague and unenforceable and fails to describe in any detail regarding specific changes to land use and transportation programs or performance criteria for the measure to ensure it will result in reduced emissions.	The County does not agree with the comment. The County and SANDAG must work cooperatively on the Regional Transportation Plan and associated Sustainable Communities Strategy that is updated every four years and was recently adopted in 2015. SANDAG and the County worked cooperatively in the drafting of the 2011 General Plan and worked with SANDAG during the development of the proposed Project and Project alternatives of the FCI Lands GPA. In tandem, the RTP and the General Plan work together to efficiently co-locate higher density land uses with the circulation and transportation options that are available to the residents and employees located in the unincorporated portions of the County.
T-32	A general plan’s goals and policies are necessarily general and aspirational. The City may rely on such policies to mitigate environmental impacts under CEQA, however, only if they will be implemented through specific implementation programs that represent a firm, enforceable commitment to mitigate. <i>See Napa Citizens for Honest Gov’t v. Napa County Bd. of Supervisors</i> (2001) 91 Cal. App. 4th 342, 358 (citing <i>Rio Vista Farm Bureau Center v. County of Solano</i> (1992) 5 Cal. App. 4th 351, 377). CEQA requires that mitigation measures actually be implemented—not merely adopted and then disregarded. <i>Anderson First Coalition v. City of Anderson</i> (2005) 130 Cal. App. 4th 1173, 1186-87 ; <i>Fed’n of Hillside & Canyon Ass’ns v. City of Los Angeles</i> (2000) 83 Cal. App. 4th 1252, 1261 .	The County disagrees with this comment. It is appropriate under CEQA both to rely on existing plan policies to reduce impacts, and to incorporate mitigation measures into a plan and thus ensure their enforcement. Public Resources Code 21081.6(b). The comment also misconstrues the legal authorities that are cited. Napa Citizens relates to later efforts to delete or change mitigation measures. The issue in Anderson First was the adequacy of fee-based mitigation, not plan policy mitigation. The issue in the Federation case was the agency’s failure to incorporate mitigation measures into the general plan document in question, not that some further measures beyond plan incorporation are required. See also Response to Comment T-33.
T-33	Here, the RDSEIR’s vague, unenforceable, and noncommittal policies and programs (and policies for which no implementation programs	The County does not agree that no implementation programs are identified. By reference, the FCI Lands GPA SEIR relies on the

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	are identified) allow the County to decide to take no action and thus fail to mitigate impacts. As a result, the RDSEIR cannot ensure that the policies relied on will in fact be implemented to mitigate the Project's impacts. Therefore they cannot serve as CEQA mitigation. <i>See Anderson First</i> , 130 Cal. App. 4th at 1186-87.	implementation programs identified in the GPU FEIR. Also, implementation programs are identified on pages 2.15-22 through 2.15-25 of the FCI Lands GPA Draft SEIR. In addition, page 2.15-21 of the Draft SEIR has been amended to include the applicable mitigation measures for each Policy identified as mitigation in Section 2.15. Consistent with Response to Comment T-28, the County agrees that General Plan Policies are not mitigation. They are General Plan policies considered as part of the baseline analysis of potential impacts from the FCI Lands GPA. Post-analysis, additional mitigation measures were considered for impacts related to Climate Change as well as all other resource areas. See Response to Comments T-13 through T-15.
T-34	A recirculated EIR must propose feasible, enforceable mitigation measures that quantify their effects on GHG emissions. Until the County does so, the EIR for this Project will be legally inadequate.	The County does not agree that the SEIR does not include feasible, enforceable mitigation or that the FCI Lands GPA SEIR is legally inadequate. See Response to Comments T-13 through T-15, T-28, and T-33.
T-35	Despite overwhelming authority to the contrary (<i>see Exhibit A</i>), the RDSEIR clings to its position that, upon the expiration of FCI, the land use designations reverted back to their pre-FCI designations. The "No Project" alternative, the RDSEIR concludes, would result in an onslaught of development and a slew of additional significant environmental impacts. RDSEIR at 4-4 and Table 4-4 at p. 4-97.	The County does not agree with the Comment. See Global Response 2 (GR-2).
T-36	The RDSEIR's analysis is not only legally incorrect—it is blatantly deceptive and designed to make the project and the EIR's alternatives look like compromise positions. They are not; the EIR must be revised to reflect the FCI condition, which is the true "No Project" alternative.	The County does not agree with the comment. Please see Global Response 2 (GR-2). The "FCI Condition" suggested by the comment is based on an initiative that no longer has legal force, as it has expired by its own terms. Consistent with the description of the expiration of the FCI in the Introduction of Chapter 1 of the Draft SEIR (page 1-1) and Project Scope (page 1-10) discussion of Chapter 1, the initiative adopting the FCI stated that it was to remain in effect until December 31, 2010. Upon expiration of the FCI, the former General Plan land use designations became effective once again. The FCI Lands GPA is a General Plan amendment to reclassify these lands to be consistent with goals, policies and guiding principles of the 2011 General Plan Update. Moreover, the initiative was reviewed in Chapter 4, Alternatives, of the Draft SEIR as a potential alternative, the FCI Density Alternative. It was rejected as infeasible; refer to Pages 4-7

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		through 4-13 for information pertaining to the rejection of the FCI Density Alternative due to its infeasibility.
T-37	As explained in prior comment letters from CNFF to the County, there is nothing in the text of the FCI or the applicable statutes and case law that suggests that the land uses “reverted back” to pre-FCI designations on January 1, 2011. To the extent the County claims otherwise means it took a discretionary action to amend the General Plan without complying with CEQA. Therefore, the RDSEIR’s alternatives analysis will remain legally inadequate until such time as the County prepares a revised EIR that properly describes and evaluates the No Project alternative as retaining FCI land use designations.	The County does not agree with the comment. Please refer to Response to Comment T-36. The County has not amended the current General Plan. The lands subject to the FCI reverted back to the previous land use designations found within the General Plan in effect at the time the FCI was enacted by voter initiative; the General Plan adopted by the County in 2011 does not apply to the FCI Lands. Notably, each operative provision of the FCI states that it is operative “through December 31, 2010” or that it “remains in effect through December 31, 2010.” This differentiates the provisions of the FCI from more typical general plan amendments, which do not include an expiration or sunset date. The FCI Lands GPA is intended to reconcile the discrepancy in land use designations between the former General Plan and the current General Plan adopted by the County in 2011.
T-38	Finally, the County’s theory that the pre-FCI land use designations will be reinstated after FCI’s sunset undermines the long-term purpose of land use planning and sound planning principles. General plans do not terminate when they reach their scheduled horizon year. <i>See</i> Gov’t Code § 65300 <i>et seq.</i> FCI’s land use designations will simply continue until such time, if ever, that the County adopts new designations.	This comment does not raise any issues concerning the sufficiency of the Draft SEIR’s analysis. Nevertheless, the County has responded to this comment below and it will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. The County agrees that general plans do not terminate when they reach their scheduled horizon year and the County is not claiming that the General Plan, past or present, has expired. The County General plan adopted in 2011 replaced, or superseded the General Plan that was in effect until the 2011 General Plan was adopted; however, the 2011 General Plan did not establish land use designations for the FCI Lands. It is the County’s position that the FCI has expired by its own terms. The FCI was not a General Plan; it was a voter initiative that amended the General Plan to establish land use designations on certain real properties subject to the initiative. Also, each provision of the FCI amending the General Plan states that it is operative “through December 31, 2010” or that it “remains in effect through December 31, 2010.” This differentiates the provisions of the FCI from more typical general plan amendments, which do not include an expiration or sunset date.

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T-39	In sum, the RDSEIR's alternatives analysis is incomplete and misleading. When it is corrected, the County must recirculate the EIR so that the public can see and comment on the new analysis.	The County does not agree with this comment. Chapter 4 of the Draft SEIR presents analysis of a reasonable range of alternatives, consistent with CEQA Guideline 15126.6, including Project alternatives that were considered but rejected as infeasible.
T-40	As we previously submitted to the County, CNFF commissioned an infill study to determine whether the County's anticipated growth in the backcountry could be accommodated in the cities. See Exhibit C "An Alternative Development Scenario for San Diego County", CNFF, July 2010. The answer is a resounding yes. However, the County pays short-shrift to this alternative. The County did not dispute the Infill's Study conclusion but instead faults it for being out-of-scope since the County is re-designating only the FCI lands. RDSEIR at 4-16.	<p>This comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. Nevertheless, the County has responded to this comment below and it will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.</p> <p>The County does not agree with the findings of the infill study commissioned by CNFF, that two-thirds of the growth planned for the unincorporated county could be accommodated in cities within San Diego County. Primarily, the County does not have the ability to direct growth to cities because it has no land use authority to do so. Current County land use plans have shifted future development from the unincorporated communities to incorporated cities. Below is an excerpt from San Diego Forward: The Regional Plan (SDF), Appendix J, Regional Growth Forecast (see page 4), which discusses how a smaller share of the region's growth is forecast to come from the unincorporated county than 1999 forecasts.</p> <p><i>"In 1999, SANDAG projected 21 percent of future housing growth would occur in the unincorporated areas of the county under the local general plans at the time. Today, SANDAG expects 17 percent of growth to occur in the unincorporated areas; much of that is focused in existing villages such as Lakeside, Valley Center, Ramona, and Alpine."</i></p> <p>SANDAG growth forecasts for the region are based on the land use plans of all the jurisdictions in the County. The capacity for growth in the region in other jurisdictions is already accounted for, as discussed below in another excerpt from SDF, Appendix J (page 3).</p> <p><i>"SANDAG staff worked extensively with the region's 18 cities, the County of San Diego, and other agencies that manage land use (e.g., the Department of Defense, tribal governments) to understand local land use plans and policies, including general plans,</i></p>

		<p><i>community plans, or specific plans, as well as constraints to development. That detailed land use information is incorporated into the future development and redevelopment projections that comprise the Series 13 Regional Growth Forecast.”</i></p> <p>Additionally, forecasted growth occurs first within the incorporated cities before the unincorporated County, according to the regional growth forecast modeling results. In all of the recent SANDAG forecasts, including the draft 2050 forecast, the forecasts already rely on the intensification of existing land uses, as discussed on page 4 of SDF, Appendix J:</p> <p><i>“As a result of changing local plans, SANDAG forecasts a general intensification of existing land uses within urban communities and along key transportation corridors. For example, National City’s general plan update results in opportunities for over 10,000 additional multifamily units near the Blue Line Trolley and planned trolley connecting San Ysidro and UTC via National City. San Marcos has drafted Specific Plans for the San Marcos Creek and University districts adding mixed use developments near Cal State-San Marcos and the SPRINTER Rail Corridor. This information was provided by these local jurisdictions to SANDAG in the land use inputs that reflect the jurisdictions’ general plans. Finally, over half of the growth in new housing will occur in the city of San Diego. Downtown will continue to thrive over the next few decades and the growth will start to spill over into areas of Barrio Logan, Golden Hill, and Uptown communities. ...”</i></p> <p>Further, the County contends that the proposed Project land use plan follows basic objectives of the City-Centered alternative by substantially reducing growth in the backcountry. See also Response to Comment T-9, which shows that when the Alpine CPA is removed from consideration, there are only 245 potential additional lots available through subdivision in the remainder of the Project area</p>
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		(56,738 acres).
T-41	This conclusion is wrong. Under CEQA the County may not segment the Project in such a way as to render certain potentially feasible alternatives infeasible; such a result violates CEQA's rules against piecemealing.	<p>The County does not agree with the comment that the Draft SEIR is segmenting the Project. The comment is not clear in explaining how the SEIR "segment(s) the Project..." in an effort to "avoid" feasible alternatives. CNFF has previously offered an alternative for consideration for the FCI Lands GPA, the City-Centered Alternative. This alternative was evaluated within Chapter 4, Alternatives of the Draft SEIR and was determined to be infeasible. Section 15126.6 of the CEQA Guidelines state:</p> <p style="padding-left: 40px;">An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publically disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature and scope of the alternative to be discussed other than the rule of reason.</p> <p>The reasons for rejecting the City-Centered alternative are provided on pages 4-15 to 4-16 of the Draft SEIR. The reasons primarily center on the alternative not meeting most of the basic Project objectives and the inability to identify the lessening of impacts overall. While impacts may not be experienced in the unincorporated County under the City-Centered alternative, they would be equal or more severe in the incorporated cities wherein the County has no jurisdictional authority to address them. Additional reasons include:</p> <ul style="list-style-type: none"> • Development beyond current planning documents within incorporated cities; • Lack of County jurisdiction to update incorporated city planning documents, or implement mitigation; • Additional development in low-lying coastal areas negatively impacted by climate change due to sea-level rise; and • The requirement for the County to meet its Regional Housing Needs Assessment allocation. <p>Additional clarification has been added to the City-Centered Alternative analysis within in the Draft SEIR, Chapter 4. The additional clarification includes:</p> <p>Selected unincorporated communities that have infrastructure and services have been appropriately targeted for growth under the</p>

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		proposed Project. In addition, every effort has been made to reduce sprawl and haphazard development patterns, thereby reducing costs, energy consumption, and emissions and protecting farmland, open space, habitat, and water quality and quantity. When compared to the existing General Plan, the proposed project substantially reduces sprawl and potential environmental impacts. (See also Response to Comments T-9 and T-40.
T-42	While the RDSEIR concedes that a City-Centered Alternative would reduce impacts on natural and agricultural resources, aesthetics, air quality, noise and traffic it prematurely dismisses that alternative without providing evidentiary support for its conclusion. RDSEIR at 4-15.	The County does not agree with the comment. Please refer to Response to Comment T-41. Consistent with CEQA Guideline 15126.6 (c) alternatives that fail to meet most of the basic project objectives, as has been determined by the County for the City Centered Alternative, may be among the reasons to eliminate the alternative from detailed consideration; evidentiary support for this determination is provided in the narrative description rejecting the alternative from detailed consideration.
T-43	Rather than conduct the analysis to determine the impacts resulting from this alternative, the RDSEIR dismisses further analysis of the City- Centered Alternative partially on the basis that such an alternative “would potentially result in greater impacts to air quality, traffic, and noise from increased construction and development in proximity to sensitive receptors.... ” Id. This conclusion is not based on any analysis and is not supported by evidence.	The County does not agree with the comment. Please refer to Response to Comment T-41 and T-42. Consistent with CEQA Guideline 15126.6 (c) alternatives that fail to reduce impacts overall or lessen the severity of potential impacts, as has been determined by the County for the City-Centered Alternative, may be among the reasons to eliminate the alternative from detailed consideration. Evidentiary support for this determination is provided in the narrative description rejecting the alternative from detailed consideration.
T-44	Moreover, the County misunderstands our point. The Infill Study demonstrates that the City-Centered Alternative is feasible since it shows that growth can and should be accommodated in the cities, not in the Forest. Such an alternative would reduce impacts related to land use, provision of public utilities and services, transportation, climate change, loss of habitat and biodiversity, loss of agricultural lands, water supply and water quality. We reiterate the request set forth by CNFF and SOFAR that the revised environmental document should further develop an Infill Alternative that embraces a forward-looking plan for land uses on FCI lands, designed to protect the environment and maintain quality of life for those living and working in the County.	The County does not agree with the comment. Refer to Responses to Comments T-40 through T-43. Consistent with CEQA Guideline 15126.6 (c), the test for an alternative to be considered is not based on feasibility, but rather, the alternatives ability to meet most of the project’s basic objectives and/or lessen the severity of one or more potential impacts.

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T-45	<p>CEQA requires agencies to analyze whether their projects will result in the wasteful or inefficient use of energy. Pub. Res. Code § 21100(b)(3); CEQA Guidelines, Appdx. F. "Under CEQA, an EIR is 'fatally defective' when it fails 'to include a detailed statement setting forth the mitigation measures proposed to reduce wasteful, inefficient, and unnecessary consumption of energy.'" <i>Cal. Clean Energy Committee v. City of Woodland</i> (2014) 225 Cal.App.4th 173, 209 (quoting <i>People v. County of Kern</i> (1976) 62 Cal.App.3d 761, 774).</p>	<p>See Global response 6 (GR-6)</p>
T-46	<p>In order to demonstrate that a project will not result in the wasteful use of energy, agencies must show that the project has decreased per capita energy consumption, decreased reliance on fossil fuel use and increased reliance on renewable energy sources. <i>Id.</i> The RDSEIR fails entirely to include this analysis. A revised EIR must analyze the Project's impacts on use of energy and identify feasible measures to reduce energy usage.</p>	<p>See Global Response 6 (GR-6)</p> <p>The County does not agree with the comments paraphrasing of the required content of CEQA Guideline Appendix F. Moreover, because the FCI Lands GPA does not authorize the construction of projects, but rather, establishes land use designations for the FCI Lands consistent with the 2011 General Plan, the FCI Lands GPA approaches resource subjects with programmatic polices and mitigation measures to address potential impacts; project-specific mitigation cannot be developed without a specific project to evaluate.</p> <p>General Plan policies that facilitate the use of renewable energy sources are provided in the Draft SEIR (pages 2.14-27 to 2.14-28). Specific policies include: COS-14.7 Alternative Energy Sources for Development Projects, COS-15.1 Design and Construction of New Buildings and COS-15.3 Green Building Programs. These policies encourage alternative energy sources, energy efficiency, green building programs, and energy recovery for development. Adherence to these policies will deter the wasteful use of energy and lessen the dependency on fossil fuels.</p> <p>Mitigation measures to reduce energy consumption are provided in the Draft SEIR (page 2.14-28). Specific mitigation measures include:</p> <ul style="list-style-type: none"> • USS-8.1 Implement, and revise as necessary, the County Green Building Program through incentives for development that is energy efficient and conserves resources. • USS-8.2 Revise Board Policy F-50 to strengthen the

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		County's commitment and requirement to implement resource-efficient design and operations for County funded renovation and new building projects. Also revise Board Policy G-15 to require County facilities to comply with Leadership in Energy and Environmental Design (LEED) standards or other Green Building rating systems.
T-47	Thank you for your consideration of these comments. We respectfully request that no further consideration be given to the Project as proposed until an EIR is prepared that fully complies with CEQA. The voters spoke loudly when they overwhelmingly approved FCI in 1991: The Cleveland National Forest is our County's legacy. We sincerely hope that you will hear the call to protect it.	This comment provides concluding remarks, a response is not required.

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U-1	This comment letter is written on behalf of the Pechanga Band of Luisefio Indians (hereinafter, "the Tribe"), a federally recognized Indian tribe and sovereign government. The Tribe formally requests, pursuant to Public Resources Code §21092.2, to continue to be notified and involved in the entire CEQA environmental review process for the duration of the above referenced project (the "Project"). Please also incorporate these comments into the record of approval for this Project.	This comment is an introduction to comments that follow. The Pechanga Band will be notified in the future pursuant to CEQA Guideline 15087 and PRC Section 21092.2. The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
U-2	The Tribe submits these comments concerning the Project's potential impacts to cultural resources in conjunction with the environmental review of the Project and to assist the County in developing appropriate avoidance and preservation standards for impacts to Cultural Resources. The Tribe has reviewed the Draft Supplemental Environmental Impact Report (DSEIR) and thanks the County of San Diego for including standard policies relating to the Resource Protection Ordinance (RPO) and cultural/historic resource protection mitigation measures.	The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
U-3	The Tribe met with the County for our SB18 government-to-government consultation on September 26, 2012 and submitted our DSEIR comments for this Project on March 18, 2013. The County did not conduct additional consultation with the Tribe until we received the second notice of availability for DSEIR. We understand from our initial meeting and our review of the DSEIR that overall, the proposed densities of the former-FCI lands will be reduced, which will result in reduced environmental impacts.	The comment identifies the government to government consultation held with the tribe and other consultations and does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the project.
U-4	The Tribe is primarily concerned about lands that are in the Pendleton/DeLuz CPA and the North Mountain Subregion areas and this time we are encouraged that the proposed development impacts to these areas will be reduced overall.	This comment identifies the commenter's primary area of interest as the Pendleton/DeLuz CPA and North Mountain Subregion. The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the project.
U-5	The DSEIR states that there will be impacts to cultural resources should these lands be developed. Further, it states that direct, indirect and cumulative impacts to archaeological resources associated with the proposed Project would be reduced to below a	The County does not agree with this comment that resources must be entirely avoided and preserved to reduce impacts to a less than significant level. While avoidance of impacts is preferred by the CEQA Guidelines and the County of San Diego, reduction of the

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	<p>level of significance with implementation of the 2011 General Plan policies and mitigation measures. The Tribe informs the County that unless cultural resources are entirely avoided and preserved, which is the preferred mitigation under CEQA, any impact is considered significant. Only preservation through avoidance can fully reduce any impacts to cultural resources to a less than significant level.</p>	<p>significance of impacts to a level of less than significant can be achieved by means other than avoidance, as has been determined within the Draft SEIR. Subsection 2.5.3.2 of the SEIR provides the guidelines for determining significance, in accordance with the CEQA Guidelines, which do not require that resources be entirely avoided and preserved.</p> <p>“Based on Appendix G of the CEQA Guidelines, the proposed Project would have a potentially significant impact if it would cause a substantial adverse change in the significance of an archaeological resource as defined by PRC Section 21083.2, State CEQA Guidelines Section 15064.5(a).....”</p> <p>Data recovery (excavation) is an allowable mitigation measure under CEQA. See PRC Section 21083.2(d); CEQA Guidelines § 15126.4(b)(3). The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.</p>
U-6	<p>Additionally, the Tribe would like to emphasize that no project evaluation is complete without contacting and consulting with tribes early in the application/development process. Tribal knowledge is often more extensive than what can be identified in archaeological institutions and records. As such, consultation for projects in the identified areas of concern are essential to understanding the suite of impacts that may occur to cultural resources.</p>	<p>The County acknowledges this comment. As shown below, subsection 2.5.4.2 of the SEIR includes mitigation measures, in addition to the measures identified in this comment letter, that require continued consultation with Native American tribes.</p> <p>Cul-2.1 Develop management and restoration plans for identified and acquired properties with cultural resources in coordination with the appropriate Native American tribe(s).</p> <p>Cul-2.4 Protect significant cultural resources through regional coordination and consultation with the NAHC and local tribal governments, including SB-18 review.</p> <p>The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.</p>
U-7	<p>The Pechanga Tribe has a wealth of information that is not available through public information and our information provides a larger, fuller picture of the landscape and ties in the physical remains (archaeological sites) with named places, Traditional Cultural Properties (TCP's), tribal cultural resources (TCRs) and other cultural data. Tribes can also assist archaeologists with answering research questions and determining the significance of physical remains.</p>	<p>The County appreciates this information; however, the comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the project.</p>

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U-8	<p>Based upon our concerns presented above, the Tribe suggests that the proposed mitigation measures be revised to include more tribal involvement and consultation requirements so that a broad analysis of cultural resources can be included for future implementing projects.</p> <p>Cul-2.5 Protect undiscovered subsurface archaeological resources by requiring grading monitoring by a qualified archaeologist and a Native American monitor for ground disturbing activities in the vicinity of known archaeological resources, and also, when feasible, during initial surveys.</p>	<p>The County does not agree with the requested change. There are not any ground disturbing activities included with this Project. County staff has found that, typically, it is feasible to have a Native American monitor present during initial surveys. This type of mitigation is outlined in the County's Guidelines for Determining Significance – Archaeological & Historic Resources. However, since this mitigation measure will require the presence of a monitor, it is essential that the feasibility of having a monitor present during initial surveys be taken into account. Further, this reflects the requirement that an EIR only describe feasible mitigation measures. (CEQA Guidelines § 15121(a).) The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.</p>
U-9	<p>Cul-2.6 Protect significant cultural resources by facilitating the identification and acquisition of important resources through regional coordination with agencies, and institutions, such as the SCIC and consultation with the NAHC and local tribal governments, including <u>AB 52 and SB-18</u> review, while maintaining the confidentiality of sensitive cultural information.</p>	<p>The County agrees with this comment concerning the AB 52 review required by current legislation, which is not reflected in Mitigation Measure Cul-2.6 in subsection 2.5.4.2 of this SEIR. The NOP for this project was released in September 2012, prior to the July 2015 date when the requirement for AB 52 consultation was established. Although AB 52 does not apply to this project, the County elected to initiate an AB 52 consultation for this project and did so on January 8, 2016. The County did not receive a request for a consultation from the Pechanga Tribe.</p> <p>In addition, Section 1.6.1 of the Draft SEIR was amended to document the Assembly Bill (AB) 52 consultations conducted for this Project. These types of changes are normally included in a biennial General Plan Clean-up General Plan Amendment; therefore, this information will be retained and included in the 2017 GP Clean-up so that the proposed change can receive the appropriate level of public review. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.</p>
U-10	<p>Cul-4.2 If human remains are encountered, California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the San Diego County Coroner has made the necessary</p>	<p>This comment proposes a new mitigation measure addressing what should occur when human remains are encountered; the County does not agree that the new mitigation measure is necessary. The</p>

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	findings as to origin. Further, pursuant to California Public Resources Code Section 5097.98(b) remains shall be left in place and free from disturbance until a final decision as to the treatment and disposition has been made. If the San Diego County Coroner determines the remains to be Native American, the Native American Heritage Commission must be contacted within 24 hours. The Native American Heritage Commission must then immediately identify the “most likely descendant(s)” of receiving notification of the discovery. The most likely descendant(s) shall then make recommendations within 48 hours, and engage in consultations concerning the treatment of the remains as provided in Public Resources Code 5097.98.	County requires that all projects comply with Health and Safety Code Section 7050.5 and Public Resources Code 5097.98 should human remains be encountered. The specific steps outlined in the regulations cited above and CEQA Section 15064.5(e) must be followed. Therefore, the suggested language is not necessary to mitigate for human remains. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
U-11	The Tribe reserves the right to fully participate in the environmental review process, as well as to provide further comment on the Project's impacts to cultural resources and potential mitigation for such impacts.	The County appreciates this comment and will notify the Tribe when the FCI Lands GPA SEIR is scheduled for certification by the County Board of Supervisors. The Tribe as well as any member of the public will be able to provide testimony at that hearing; however, additional opportunities for public comment are not required by CEQA unless the SEIR is recirculated again for public review and comment, consistent with CEQA Guideline 15087.
U-12	The Pechanga Tribe looks forward to working together with the County of San Diego in protecting the invaluable cultural resources found within the County boundaries. Please contact me at 951-770-8113 or at eozdil@pechanga-nsn.gov if you have any comments or questions. Please also forward a copy of the final DSEIR to us for our review and files. Thank you.	This comment provides concluding remarks, a response is not required.

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V-1	<p>This General Plan Amendment is one of many being proposed that expand the Village land use designations outside the boundaries for the Village areas in the County's relatively new General Plan. The Cleveland National Forest Foundation has written repeatedly, and I agree with their view, that approval will allow development to further encroach into stressed, fragile ecosystems within the Cleveland National Forest.</p>	<p>The County acknowledges that, as shown on Draft SEIR Figure 1-2B, land uses are proposed to expand the village of Alpine eastward along Interstate 8 (see also Response to Comment V-5). The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine the final land use designations for the Project.</p>
V-2	<p>This encroachment is not justified. The RDSEIR identifies the Modified FCI Condition alternative as reducing encroachment into forest areas and as environmentally superior. See RDSEIR at S-7 and 4-2. The County should NOT be considering the proposed Project when there is clearly an environmentally superior option. New development can and should be accommodated inside the Village designated areas so that agriculture, open space and forest land values can be preserved.</p>	<p>The County agrees that the Modified FCI Condition alternative reduces potential impacts when compared to the Draft SEIR proposed Project. This comment references Draft SEIR pages S-7 and 4-2, which provide a description of the Modified FCI Condition alternative. This alternative is a result of the public outreach process for this Project and was developed for analysis as the environmentally superior alternative. However, the County does not agree that the proposed Project should not be considered because there is an environmentally superior option.</p> <p>The comment does not explain how the Modified FCI alternative fully meets all Project objectives better than the proposed Project. The Draft SEIR proposed Project more closely reflects the October-November 2013 recommendations of the Planning Commission and the June 2014 land use map endorsements of the Board of Supervisors, which provide the intent of the Project objectives outlined in the Draft SEIR Section 1.3.</p> <p>The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine whether to approve the proposed Project or an alternative to the Project.</p>
V-3	<p>The County should NOT be considering any amendments that add thousands of houses in rural areas to the 2011 County General Plan which already accommodates some 70,000 new units – and in areas where infrastructure, transit, jobs, shopping, civic facilities and other urban amenities are planned, or already exist.</p>	<p>The comment asserts that the County should not be considering an amendment that adds thousands of homes to rural areas. As explained in SEIR Section 4.5.1, the proposed Project is assigning land use designations that will decrease densities overall when compared to the existing land use designations, i.e. the No Project alternative. As described in SEIR Chapter 4 Section 4.1, the No Project alternative represents the pre-FCI General Plan land use densities which currently apply to the former FCI lands (Project areas). Therefore,</p>

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		<p>current land use designations provide for densities on these lands, which are generally higher than densities of the proposed Project and higher than the densities in effect during the life of the FCI (1993-2010). The analysis in the Draft SEIR did not use either the current densities or the densities of the FCI as a baseline. Rather, the SEIR analyzed the impacts of the proposed Project in comparison to existing physical conditions (i.e., what is on the ground today). See also Global Response 2 (GR-2).</p> <p>The County does not agree that the proposed Project would add “thousands of homes in rural areas”. Table 1-1C has been added to subsection 1.2.1 of the SEIR to show the subdivision potential of the proposed Project as it compares with the subdivision potential of the existing land use designations (No Project alternative). As shown in this table, buildout of the proposed Project would potentially add 2,395 additional residential lots beyond the 3,850 existing parcels. This is 8,917 fewer lots than would be allowed by the existing land use designations. Table 1-1C shows that 2,224 of the 2,395 additional lots that could result from buildout of the proposed Project are in the community of Alpine, most of which are planned as an extension to the existing Alpine Village along the Interstate 8 corridor. In addition, much of this new development potential would be located in the vicinity of the Viejas Reservation, characterized by urban development patterns consisting of two five-story hotel towers and a casino and retail mall complex. Therefore, buildout of the proposed Project would result in a potential of only 171 additional lots throughout the remainder of the Project area, rather than the thousands of homes claimed by the comment to be allowed under the proposed Project.</p> <p>The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.</p>
V-4	<p>I support CNFF’s recommendation to create a “forest” designator to overlay all lands regardless of parcel size within the FCI planning area. CNFF supports minimum parcel sizes of at least 40 (or 80) acres outside country towns (villages) to protect forest values. As CNFF has written, again repeatedly and I think wisely, the “forest” designator would serve as</p>	<p>The County is unclear as to the benefit of the proposed “forest” designator, other than add an unnecessary administrative burden to the County. Refer also to Response to Comment T-6.</p> <p>The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers</p>

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	<p>a “red flag” for landowners that seek to develop or subdivide properties in excess of the adopted FCI Amendment land use designations. The “forest” designator is fully consistent with the San Diego County Guiding Principles and would specifically reinforce Guiding Principles 2 (compact development within Village boundaries), 3 (vitalize existing communities), 4 (habitat protection), 5 (wildfire risk), 6 (promote public transportation), 7 (reduce greenhouse gas emissions), 8 (preserve agriculture), and 9 (reduce infrastructure costs).</p>	<p>in evaluating the Project.</p>
V-5	<p>What is the point of planning if the plans are ignored? As it is, San Diego County’s flaccid enforcement of its own General Plan encourages windfall speculation in wild lands we MUST protect while it discourages responsible investment in city-building.</p>	<p>The County does not agree with this comment, which asserts that the proposed Project is ignoring the General Plan. FCI lands were not included (provided land use designations) in the 2011 General Plan Update, although densities associated with the FCI lands were assumed (generally at 1:40 or 1:80) for overall General Plan implementation impact determination. The primary purpose of this Project (FCI Lands GPA) is to assign land use designations to the FCI lands that were not included in the General Plan Update, consistent with the Project objectives and General Plan Guiding Principles. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.</p>

W-1	<p>Thank you for providing notification to Sweetwater Authority (Authority) on the Draft Revised Supplemental Environmental Impact Report (SEIR) for the Forest Conservation Initiative (FCI) Lands General Plan Amendment, GPA 12-004. Sweetwater Authority is a public water agency in the South Bay area of San Diego County serving approximately 191,500 people residing in National City, the western and central portions of Chula Vista, and Bonita. The Authority operates Sweetwater Reservoir in Spring Valley and Loveland Reservoir in Alpine to store local and imported water for its customers and utilizes the Sweetwater River to transfer water from Loveland Reservoir to Sweetwater Reservoir. The proposed project would potentially affect the former FCI lands and adjacent private lands in San Diego County, including areas within the 230-square-mile Sweetwater River watershed.</p>	<p>This comment is an introduction to comments that follow. No further response is required.</p>
W-2	<p>2.7.4.1. Water Quality Standards and Requirements The Authority recommends updating Mitigation Measure Hyd-1.10 (p. 2.7-18). This Mitigation Measure requires coordination with the State Water Resources Control Board to develop statewide performance and design standards for conventional and alternative Onsite Wastewater Treatment Systems (OWTS). The document states that when alternative OWTS are permitted, implementation of this Mitigation Measure will help prevent potential conflicts with applicable standards and regulations. However, it is our understanding that the County Code was amended in 2015 to include supplemental treatment systems, and this amendment was completed through a Local Agency Management Program (LAMP) for OWTS approved by both the Regional Water Quality Control Board and the County Board of Supervisors. A copy of the document is enclosed. The LAMP is designed to protect surface water bodies and groundwater sources from contamination through the proper design, placement, installation, maintenance, and assessment of individual OWTS and should be incorporated in Mitigation Measures for GPA 12-004. Because the Authority derives up to 70 percent of its potable water from local sources, including groundwater and surface water runoff to</p>	<p>The County agrees that the Local Agency Management Program (LAMP) for Onsite Wastewater Treatment Systems, which contains design/performance standards for alternative onsite wastewater treatment systems, was approved by the Regional Water Quality Control Board on April 29, 2015 and adoption and ordinance changes were approved by the County Board of Supervisors on June 24, 2015. Mitigation measure Hyd-1.10 applies to all lands in the unincorporated county. The County does not agree that Hyd-1.10 needs to be updated because the County and Regional Water Board have coordinated, developed and adopted “performance and design standards for conventional and alternative on-site wastewater treatment systems.” Potential impacts to water quality derived from conventional and alternative on-site wastewater treatment systems are addressed on a project by project basis and would be addressed directly by Mitigation Measures Hyd-1.1 through Hyd-1.10 and General Plan Policies LU-6.5, LU-6.9, LU-14.1 through LU-14.4, COS-4.2 through COS-4.4, COS-5.2, COS-5.3, COS-5.5; and indirectly addressed by Mitigation Measures Hyd-1.1 through Hyd-1.5, Hyd-2.1 through Hyd-2.5 and General Plan Policies LU-8.1, LU-8.2, LU-13.1, LU-13.2, COS-4.1 through COS-4.4 and COS-5.2.</p>

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	the Sweetwater River, water quality impacts could potentially carry significant ramifications for the Authority's water supply and customers.	
W-3	Alpine Land Use Map The Alpine Land Use map (AL-propproj) includes an incorrect land use designation for Assessor's Parcel Number 520-100-12-00. This parcel, shown on enclosed Figure 1-2A, has been under the Authority's ownership since 2013 and should be designated as Public Agency Lands instead of the proposed Rural Lands (RL-40) designation shown on the map.	The commenter requests that the County change the land use designation for assessor parcel number 520-100-12-00 from Rural Lands 40 to Public Agency Lands due to a change in ownership. This change will reduce the potential buildout in Alpine by one dwelling unit and would not have a measurable change to the impact analysis in the SEIR. These types of changes are normally included in a biennial General Plan Clean-up General Plan Amendment; therefore, this land use designation change will be included in the 2017 GP Clean-up so that the proposed change can receive the appropriate level of public review.
W-4	We appreciate the opportunity to comment on the Draft Revised SEIR for the FCI Lands General Plan Amendment. Please continue to include the Authority on the County's distribution list for GPA 12-004. If you have any questions, please contact Jane Davies at jdavies@sweetwater.org or (619) 409-6816.	This comment provides concluding remarks, a response is not required.

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X-1	The timing, coincidentally, seems excellent to deal with another EIR-type event-the imposing Northern Route of the SDG&E Sunrise Powerlink line TL682. As you know, the increased easement size to accommodate the 500KW lines, supported by CPUC Rule 95, Sec. 35, allows SDG&E to cut to bare earth everything, to the last blade of grass, a swath twice as wide as the distance between poles - 800-1000 feet t+!!	The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative that will be considered by the decision makers. This letter references two parcels (APNs 135-320-02-00 and 136-210-01-00) which are discussed in SEIR Section 4.1.1, Fisher Property Exemption. As discussed in this section of the SEIR, this property totals approximately 87.5 acres and spans both the Pala-Pauma and North Mountain Subregions. However, only 13.5 acres of APN 136-210-01-00, which is located in the North Mountain Subregion were subject to the FCI and are within the Project area. This comment is discussing a different project than this FCI Lands GPA, which is the construction of San Diego Gas and Electric (SDG&E) powerlines. There is no known relationship between the two projects. Therefore, a response is not required.
X-2	Due to the uniqueness, layout, and location of our property, with this probability, it could completely destroy an entire oak grove and the habitats of hundreds of animals - it would be a "taking" far in excess of the "down-zoning" being proposed.	The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative that will be considered by the decision makers. The FCI Lands GPA proposed Project and alternatives would not affect the alignment of the powerlines being addressed by the comment. The FCI Lands GPA is not a "down-zoning" proposal; the FCI Lands GPA does not propose nor require the County to "take" any private property to implement the Project. See Response to Comment X-1.
X-3	Could I please request a "helpful discretionary hat" be put on? I believe the following will be beneficial to all parties, without taking from another, and still stay within everyone's guidelines, such as your COM.	This comment is an introduction to comments that follow. No further response is required.
X-4	First, please review maps A & B. Keeping with the "Big Picture" from say 20,000 ft., our property has some aspects that are unusual: (a) though relatively small, it has 9 conflicting interests - state, federal, BLM, two planning groups, Tree of the U.S., MSCP, owner, fauna; (b) elevation/terrain (2500±MSL vs. 6500±MSL); water availability; (c) major east/west highway.	The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative that will be considered by the decision makers. This comment refers to two maps included with this comment: (A) Point Precipitation Frequency and (B) a topographical map showing the subject property. The County concurs with the comment that the area in the vicinity of the subject property has multiple landowners, a significant elevational range, highway access within the vicinity and a potential potable water supply.

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X-5	<p>Second, Highway 76, as a designated "Scenic Highway", the legislation clearly supports/mandates the undergrounding of utilities. The County, as a fellow landowner (school to the east), together with CNF (really not needed), Rey River Ranch, La Jolla Indian Reservation, all supporting at no cost, can enjoy this benefit.</p>	<p>The General Plan, Conservation & Open Space Element Table COS-1 designates State Route (SR) 76 in the vicinity of the subject property as a County Scenic Highway. However, SR 76 is not a designated state scenic highway which the state legislation would apply to. Scenic Highway Guidelines, prepared by the California Department of Transportation (Caltrans), identifies the process for nominating, then designating a state highway as scenic. The designation portion of this process requires State legislative actions. Therefore, the legislation that applies to undergrounding powerlines adjacent to state highways would not apply to SR 76. In addition, the County does not agree that legislation mandates undergrounding of utilities for designated Scenic Highways because the language of the Code states to achieve undergrounding whenever feasible. The applicable text from Public Utilities Code, Division 1, Part 1, Chapter 2, Section 320 is provided below.</p> <p>"...The Legislature hereby declares that it is the policy of the State to achieve, <i>whenever feasible</i>, and not inconsistent with sound environmental planning, the undergrounding of all future electric and communication distribution facilities which are proposed to be erected in proximity to any highway designated a state scenic highway..."</p>
X-6	<p>[Note]: AT&T has already set a precedent by burying their lines in the highway. SDG&E has agreed to underground this new line on the contiguous La Jolla Reservation (gas station, store, campground, motocross), also setting a precedent. The elevation all along the road raises our property, like a shelf, which puts it at risk for SDG&E to do the Rule 95 game.</p>	<p>See Response to Comment X-1. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative that will be considered by the decision makers.</p>
X-7	<p>Third, a creek runs near a pole. The biological/environmental damage due to the anchors needed for the poles would expand SDG&E damage all along its easement in this canyon area of the San Luis Rey River.</p>	<p>See Response to Comment X-1. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative that will be considered by the decision makers. This comment raises an issue that a creek near an SDG&E pole would cause the need for anchors that could result in biological/environmental damage. This SDG&E project, which is separate from the FCI Lands GPA, is required to prepare a separate environmental analysis that is not included with this Project. Any environmental impacts would be identified by the</p>

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		analysis prepared for the SDG&E project.
X-8	<p>[Summary]:</p> <p>By returning our property to the 1 DU/BAC and recognizing the 2 MU P's, SDG&E will be further encouraged to move into the highway to place their lines, vs. condemnation.</p>	<p>The commenter has not provided any evidence to show how the General Plan land use designation would relate to where SDG&E locates their powerlines. See Response to Comment X-1. Without this direct evidence, the County does not concur that the designation of the subject property (either one dwelling unit per eight or 40 acres) would have any effect on where SDG&E locates their powerlines. This comment does not raise an issue related to an environmental issue for the FCI Lands GPA pursuant to CEQA.</p>
X-9	<p>The benefit to SOG&E is there is no restriction on size of line. Current EIR is still in question. No maintenance cost for easement. SDG&E can take credit for "beautifying the landscape". SDG&E can take credit for the "ultimate fire protection" they will be providing.</p>	<p>The benefits identified in this comment for undergrounding powerlines; such as beautification, less maintenance cost and better fire protection, are not related to the FCI Lands GPA. Therefore, this comment does not raise an issue related to an environmental issue related to this Project. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine the final land use designations for the Project.</p>
X-10	<p>San Diego County will enjoy the elimination of concerns over electromagnetic fields from 500KW± lines harming their children. San Diego County can enjoy, with no subsidy, 50-80± Affordable Housing homes that could be built by any owner of our property without being first transferred to Indian exemption. Note: We would accept the original 1 DU/SAC, with a condition that homes be "green", the value be "affordable", water be, as it has been and is now, from the mountain, any oak tree disturbed be mitigated by 2 to 1 on westerly portion where dozer work during the '07 fires wiped out many oaks.</p>	<p>The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative that will be considered by the decision makers. This comment discusses additional benefits of undergrounding SDG&E powerlines. Refer to Response to Comment X-9, which explains why this is not related to the FCI Lands GPA.</p> <p>The comment further implies that 50 to 80 homes could be built if the subject property were designated at a density of one dwelling unit per eight acres. Please refer to Response to Comment X-1, which explains that only 13.5 acres of the total 87.5 acres of the subject property are within the FCI Lands GPA Project area. Therefore, even if this portion of the parcel were designated at a density of one dwelling unit per eight acres, only one additional dwelling unit would be allowed at buildout.</p> <p>In addition, as explained in SEIR Section 4.1.1, Fisher Property Exemption, the semi-rural density of one dwelling per eight acres proposed by this comment would not be consistent with the General Plan Guiding Principles (refer to the General Plan Consistency</p>

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		Determination provided in this section).
X-11	Mr. Citrano, the COM process appears to try to be fair to the people. Our property, to many, would seem to be like some in the Middle East, with warfare and conflict coming at it from all sides. Some solutions would be the equivalent of taking off a complete hand in place of a "fingernail trim".	The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative that will be considered by the decision makers. Refer to Responses to Comments X-1 and X-10.
X-12	I pray "County Discretionary Power" will be like the good Lord parting the Red Sea for His people.	This comment provides concluding remarks, a response is not required.

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Y-1	My mother is Dorthiea Hinkle, owner of the afore-mentioned properties. At her age, she is unable to manage and care for the property that has been in our family for over 20 years. She has attempted to sell it as a ranch with, really, little or no development potential, and there is no market for that. There is also no market, from what I can tell, for 40 acre "ranch-ettes".	The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
Y-2	Even if one had the money to subdivide, the infrastructure needed to reach the individual properties would leave nothing in the deal for the land owner.	The comment expresses concern over the costs of providing necessary infrastructure to the property. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
Y-3	I encourage my mother to support the plan shown in Figure 4-3A which was adopted by the San Diego County Planning Commission. It would allow her more lots and the ability to cluster them all on her relatively flat front 60 acres. This is in keeping with the neighborhood south of Japatul Spur, much of which had subdivided to this density before the FCI was initiated.	This comment expresses support for the Alpine Alternative Land Use Map alternative shown on Draft SEIR Figure 4-3A, which was the alternative recommended, not adopted as the comment infers, by the County Planning Commission in November 2013. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine whether to approve the proposed Project or an alternative to the Project.
Y-4	I therefore support the "Alpine Land use Alternative Map Figure 4.3 A", and do NOT support the "Mid Density Plan" that calls for 40 acre minimum over the entire property.	The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR, but concerns the commenter's preference for the Alpine Alternative Land Use Map alternative over the Mid-density alternative. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine whether to approve the proposed Project or an alternative to the Project.

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Z-1	My name is Dorthiea Hinkle. I am over 90 years of age, and have lived on this property (until recently) for over 20 years. My husband, Al Hinkle, owned this land when I married him in 1993.	The comment provides introductory remarks and does not raise an issue related to an environmental issue pursuant to CEQA. No response is required.
Z-2	It is not easy to manage and maintain properties of this size. They are too small to ranch efficiently, and too large for a home. Forty acre minimum, with the cost to run roads and water, would leave you nothing for value in the land.	The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
Z-3	I feel like that I know every nook and cranny of that land. I have explored the gold mine which was a delight for the children and their friends; and I have found beauty in the wilder, more secluded parts of the property.	The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
Z-4	But, people do not seem to want to hold or care for large pieces of property anymore. When Al acquired it, he believed in its future development opportunities. County regulations have severely limited that potential. I see my neighbors confronted with the same quandary.	The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine whether to approve the proposed Project or an alternative to the Project.
Z-5	That is why I have decided that I can accept the compromise offered by the Planning Commission that, I am told, provides 20 acre minimum over about 60 of my front acres, and would leave the balance of the land untouched. That is reflected, I believe, in Figure 4-3A of the "Alpine Land Use Alternative Map".	The comment is correct that the Alpine Alternative Land Use Map Alternative reflects the designations recommended by the Planning Commission in November 2013. However, the County does not agree that this alternative would assign a 20-acre minimum lot size. The 2011 General Plan Update, which bifurcated lot size and density, assigned a density of one dwelling unit per 20 acres. However, minimum lot size is addressed in zoning. The Project proposes to change the zoning to an 8-acre minimum lot size for these parcels. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine whether to approve the proposed Project or an alternative to the Project.
Z-6	I have been told that "clustering" lots on the front 60 acres will be allowed, and this would enable me to have 7 viable lots of an 8 acre size.	The County Conservation Subdivision Program <i>requires</i> clustering at densities of one dwelling unit per ten acres or lower. More details on the Conservation Subdivision Program are available at:

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		<p>http://www.sandiegocounty.gov/content/sdc/pds/advance/conservationsubdivision.html</p> <p>The densities assigned by the Alpine Alternative Land Use Map alternative would allow the 237-acre property to be subdivided into seven lots; however, other factors will also need to be considered when determining how many lots would result from subdivision of the subject property, such as meeting infrastructure and access requirements. The County agrees with the statements in this comment, which are consistent with the analysis in the Draft SEIR. The comment does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project. Ultimately, the Board of Supervisors will determine whether to approve the proposed Project or an alternative to the Project.</p>
Z-7	I may never develop this property, but it is what I hope to leave to my children. And, as I feel I have been a good steward of the land up until now, I would like to be assured that the greatest potential of the land is achieved, while maintaining its' wild beauty in other areas.	This comment provides concluding remarks, a response is not required.

AA-1	Our property located at 3535 Alpine Boulevard is surrounded on 3 sides by the Augustyne-Kaderabek holding. Because we have a similar expectation for the future development of our area, we hope to work in a compatible manner with our neighbor and the county to realize a sensible plan.	This comment letter addresses the same property referenced in Comment Letter H (APNs 404-231-03 and 404-240-18). As with Comment H-1, this comment provides the context for the property and the property owners' intent to prepare a development plan acceptable to the County and adjacent property owners. The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
AA-2	Consequently, we approve the reclassification shown on all pertinent maps for a designation of VR-2 and Rural Commercial on the Augustyne-Kaderabek properties.	This comment provides support for the land use designation assigned to a neighboring property by the Draft SEIR proposed Project and also by the Alpine Alternative Land Use Map, Mid-density and Modified FCI Condition alternatives. The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
AA-3	We believe we are the only residential neighbor to the proposed Rural Commercial, and we see it as a benefit; given its proximity to the West Willows off ramp.	The commenter expresses support for the Rural Commercial designation within the proposed Project designations that are proposed for the neighboring property and does not raise an issue concerning the sufficiency of the analysis in the Draft SEIR. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
AA-4	We are glad to see the SEIR finally going forward, and we look forward to its final resolution before the San Diego County Board of Supervisors in 2016.	This comment reiterates the support for the Draft SEIR proposed Project. The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.

AB-1	As the owner of these parcels totaling 78.42 acres, we have been working for several years toward achieving the classifications illustrated in the SEIR on both the Alpine "mid density" map and the Alpine "Land Use alternative Map".	This comment provides that the commenter is the owner of two parcels in Alpine within the Project area (APNs 404-231-03-00 and 404-240-18-00) and that the commenter has been working toward achieving the designations assigned by the Mid-density and Alpine Alternative Land Use Map alternatives. To clarify, the proposed Project and Modified FCI Condition alternative assign the same designations, which are Village Residential 2 (VR-2) and Rural Commercial. The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
AB-2	Our property was recommended for the classifications of VR-2 with a small area set aside for Rural Commercial in the Alpine Community Planning Group Plan, the Staff recommended plan, and the San Diego County Planning Commission Plan.	The comment correctly states that both the Alpine Community Planning Group and County Planning Commission recommended a VR-2 land use designation for the subject property. The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
AB-3	Our inclusion within the village of Alpine, our immediate proximity to the site of the future Alpine High School, as well as being inside the current Water Service Area makes this property very appropriate for higher density development.	The subject property is not within the Alpine Village; however, the subject property is within the County Water Authority boundary. The County agrees that a primary objective of the General Plan Update was to focus growth inside the CWA boundary. The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
AB-4	We look forward to a hearing in the near future that will bring this matter to a pleasant conclusion. It has been a long four and a half years.	This comment, which encourages a hearing in the near future, does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
AB-5	We support the classification of VR-2 over our residential land and Rural Commercial on 2.4 acres.	The County acknowledges the commenter's support for a VR-2 and Rural Commercial designation for the subject property. The comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-

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AC-1	Our property is an immediate neighbor to the property located at 3535 Alpine Blvd. and known as the Campbell Creek Ranch; in fact, we surround it on (3) sides.	This comment, which identifies the location of a specific property located at 3535 Alpine Boulevard within the Project area, does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
AC-2	We recognize that like our own property, the Campbell Ranch is within the Village Core, and must be expected to take its' share of the growth of our community.	The subject property is not within the Alpine Village; however, the subject property is within the County Water Authority boundary. The County agrees that a primary objective of the General Plan Update was to focus growth inside the CWA boundary. This comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
AC-3	Much like our own property, Campbell's holding is within the water service area and can, at some point, be expected to have sewer available.	The commenter is correct that the property is within the service area for the Padre Dam Municipal Water District. This comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
AC-4	Therefore, we support the recommended designation of VR-2 as described in both the Alpine Mid Density Map and the Alpine Land Use Alternative map. This property, like our own, received the full support of the Alpine Planning Group and the SD County Planning Commission.	The commenter supports a Village Residential 2 (VR-2) designation for the subject property. The County acknowledges that the Draft SEIR proposed Project; the Alpine Alternative Land Use Map, Mid-density and Modified FCI Condition alternatives assign a VR-2 designation to the subject property. The County confirms both the Alpine Community Planning Group and County Planning Commission recommended VR-2 for the subject property. This comment does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.
AC-5	We look forward to the final resolution of this matter in the near future.	This comment provides concluding remarks and does not raise any issues concerning the sufficiency of the Draft SEIR's analysis. The comment will be included in the administrative record that will be considered by the decision-makers in evaluating the Project.