



EDMUND G. BROWN JR.
GOVERNOR

STATE OF CALIFORNIA
GOVERNOR'S OFFICE *of* PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT



KEN ALEX
DIRECTOR

Memorandum

Date: December 16, 2015
To: All Reviewing Agencies
From: Scott Morgan, Director
Re: SCH # 2015121012
Property Specific Requests General Plan Amendment

Pursuant to the attached letter, the Lead Agency has *extended* the review period for the above referenced project to **February 4, 2016** to accommodate the review process. All other project information remains the same.

cc: Peter Eichar
San Diego County
5510 Overland Avenue, Suite 110
San Diego, CA 92123

NOP Distribution List

County: San Diego

SCH#

2015121012

Resources Agency

- ☒ Resources Agency Nadell Gayou
- ☐ Dept. of Boating & Waterways Denise Peterson
- ☐ California Coastal Commission Elizabeth A. Fuchs
- ☐ Colorado River Board Lisa Johansen
- ☐ Dept. of Conservation Elizabeth Carpenter
- ☐ California Energy Commission Eric Knight
- ☒ Cal Fire Dan Foster
- ☐ Central Valley Flood Protection Board James Herola
- ☐ Office of Historic Preservation Ron Parsons
- ☐ Dept. of Parks & Recreation Environmental Stewardship Section
- ☐ California Department of Resources, Recycling & Recovery Sue O'Leary
- ☐ S.F. Bay Conservation & Dev't Comm. Steve McAdam
- ☒ Dept. of Water Resources Resources Agency Nadell Gayou
- ☐ Fish and Game
- ☐ Depart. of Fish & Wildlife Scott Flint Environmental Services Division
- ☐ Fish & Wildlife Region 1 Curt Babcock
- ☐ Fish & Wildlife Region 1E Laurie Harnsberger
- ☐ Fish & Wildlife Region 2 Jeff Drongesen
- ☐ Fish & Wildlife Region 3 Charles Annor
- ☐ Fish & Wildlife Region 4 Julie Vance
- ☒ Fish & Wildlife Region 5 Leslie Newton-Reed Habitat Conservation Program
- ☐ Fish & Wildlife Region 6 Tiffany Ellis Habitat Conservation Program
- ☐ Fish & Wildlife Region 6 I/M Heidi Calvert Inyo/Mono, Habitat Conservation Program
- ☐ Dept. of Fish & Wildlife Marine Region George Isaac

Other Departments

- ☐ Food & Agriculture Sandra Schubert Dept. of Food and Agriculture
- ☐ Depart. of General Services Public School Construction
- ☐ Dept. of General Services Anna Garbeff Environmental Services Section
- ☐ Delta Stewardship Council Kevan Sansam
- ☐ Housing & Comm. Dev. CEQA Coordinator Housing Policy Division
- ☐ Independent Commissions, Boards
- ☐ Delta Protection Commission Michael Machado

OES (Office of Emergency Services)

Marcia Scully

Native American Heritage Comm.

Debbie Treadway

Public Utilities Commission Supervisor

Santa Monica Bay Restoration Guangyu Wang

State Lands Commission

Jennifer Deleong

Tahoe Regional Planning Agency (TRPA)

Cherry Jacques

Cal State Transportation Agency, CalSTA

Caltrans - Division of Aeronautics Philip Crimmins

Caltrans - Planning HQ LD-IGR Terri Pencovic

California Highway Patrol Suzann Kleuchl Office of Special Projects

Dept. of Transportation

Caltrans, District 1 Rex Jackman

Caltrans, District 2 Marcelino Gonzalez

Caltrans, District 3 Eric Federicks - South Susan Zarochi - North

Caltrans, District 4 Patricia Maurice

Caltrans, District 5 Larry Newland

Caltrans, District 6 Michael Navarro

Caltrans, District 7 Dianna Watson

Caltrans, District 8 Mark Roberts

Caltrans, District 9 Gayle Rosander

Caltrans, District 10 Tom Dumas

Caltrans, District 11 Jacob Armstrong

Caltrans, District 12 Maureen El Harake

Cal EPA

Air Resources Board

All Other Projects Calh Slaninski

Transportation Projects Nesamani Kalandiyur

Industrial/Energy Projects Mike Tolstrup

State Water Resources Control Board Regional Programs Unit Division of Financial Assistance

State Water Resources Control Board Karen Larsen Division of Drinking Water

State Water Resources Control Board Student Intern, 401 Water Quality Certification Unit Division of Water Quality

State Water Resources Control Board Phil Crader Division of Water Rights

Dept. of Toxic Substances Control CEQA Tracking Center

Department of Pesticide Regulation CEQA Coordinator

Regional Water Quality Control Board (RWQCB)

RWQCB 1 Cathleen Hudson North Coast Region (1)

RWQCB 2 Environmental Document Coordinator San Francisco Bay Region (2)

RWQCB 3 Central Coast Region (3)

RWQCB 4 Teresa Rodgers Los Angeles Region (4)

RWQCB 5 Central Valley Region (5)

RWQCB 5F Central Valley Region (5) Fresno Branch Office

RWQCB 5R Central Valley Region (5) Redding Branch Office

RWQCB 6 Lahontan Region (6)

RWQCB 6V Lahontan Region (6) Victorville Branch Office

RWQCB 7 Colorado River Basin Region (7)

RWQCB 8 Santa Ana Region (8)

RWQCB 9 San Diego Region (9)

Other

Conservancy

State of California

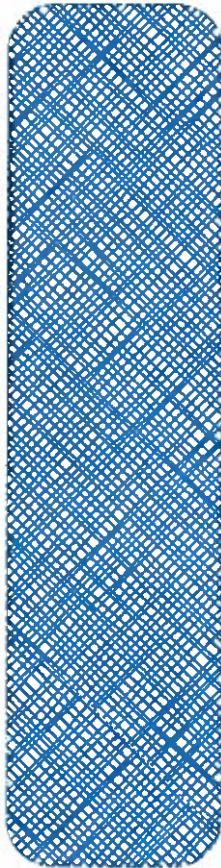
Governor's Office of Planning and Research

State Clearinghouse

P.O. Box 3044

1400 Tenth Street

Sacramento, California 95812-3044



Hasler

12/04/2015

US POSTAGE

\$00.48⁵

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Planning and
Development Services

ZIP 95814

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Edmund G. Brown Jr.
Governor

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



Ken Alex
Director

Notice of Preparation

December 3, 2015

To: Reviewing Agencies
Re: Property Specific Requests General Plan Amendment
SCH# 2015121012

Attached for your review and comment is the Notice of Preparation (NOP) for the Property Specific Requests General Plan Amendment draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

Peter Eichar
San Diego County
5510 Overland Avenue, Suite 110
San Diego, CA 92123

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Attachments
cc: Lead Agency

**Document Details Report
State Clearinghouse Data Base**

SCH# 2015121012
Project Title Property Specific Requests General Plan Amendment
Lead Agency San Diego County

Type NOP Notice of Preparation

Description The proposed project would result in revisions to the existing General Plan Land Use and zoning designations on private properties including their surrounding study areas, totaling approximately 13,000 acres, within 1,146 parcels throughout the unincorporated County and would result in increased residential densities of approximately 2,800 residential dwelling units above the number currently allowed by the existing General Plan. The project applies to the following Community Planning Areas (CPAs)/Subregional Planning Areas within the unincorporated area of San Diego County: Bonsall CPA, Crest-Dehesa CPA, Desert Subregion, Fallbrook CPA, Mountain Empire Subregion, North County Metro Subregion, Pala Pauma Subregion, San Dieguito CPA, and Valley Center CPA.

Lead Agency Contact

Name Peter Eichar
Agency San Diego County
Phone (858) 495-5524 **Fax**
email
Address 5510 Overland Avenue, Suite 110
City San Diego **State** CA **Zip** 92123

Project Location

County San Diego
City
Region
Cross Streets
Lat / Long
Parcel No. Multiple
Township **Range** **Section** **Base**

Proximity to:

Highways multiple
Airports
Railways
Waterways various
Schools
Land Use

Project Issues Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Minerals; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Sewer Capacity; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Wildlife; Landuse; Cumulative Effects; Other Issues

Reviewing Agencies Resources Agency; Cal Fire; Department of Parks and Recreation; Department of Water Resources; Department of Fish and Wildlife, Region 5; Office of Emergency Services, California; Native American Heritage Commission; California Highway Patrol; Caltrans, District 11; Air Resources Board; State Water Resources Control Board, Division of Financial Assistance; Regional Water Quality Control Board, Region 9

Date Received 12/03/2015 **Start of Review** 12/03/2015 **End of Review** 01/04/2016

Note: Blanks in data fields result from insufficient information provided by lead agency.

Notice of Completion & Environmental Document Transmittal

2015121012

Mail to: State Clearinghouse, P. O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613
For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

SCH # pending

Project Title: Property Specific Requests General Plan Amendment

Lead Agency: County of San Diego, Planning & Development Services

Contact Person: Peter Eichar

Mailing Address: 5510 Overland Avenue, Suite 110

Phone: 858-495-5524

City: San Diego

Zip: 92123

County: San Diego

Project Location: County: San Diego

City/Nearest Community: multiple

Cross Streets: _____ Zip Code: _____

Lat. / Long.: _____ ° _____ ' _____ " N / _____ ° _____ ' _____ " W

Total Acres: _____

Assessor's Parcel No.: Multiple

Section: _____

Twp.: _____

Range: _____

Base: _____

Within 2 Miles: State Hwy #: multiple

Waterways: various

Airports: _____

Railways: _____

Schools: _____

Document Type:

CEQA:

☒ NOP

☐ Early Cons

☐ Neg Dec

☐ Mit Neg Dec

☐ Draft EIR

☐ Supplement/Subsequent EIR

(Prior SCH No.) _____

Other _____

NEPA:

☐ NOI

☐ EA

☐ Draft EIS

☐ FONSI

Other:

☐ Joint Document

☐ Final Document

☐ Other _____

Local Action Type:

☐ General Plan Update

☒ General Plan Amendment

☐ General Plan Element

☐ Community Plan

☐ Specific Plan

☐ Master Plan

☐ Planned Unit Development

☐ Site Plan

☒ Rezone

☐ Prezone

☐ Use Permit

☐ Land Division (Subdivision, etc.)

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STATE CLEARING HOUSE

☐ Annexation

☐ Redevelopment

☐ Coastal Permit

☐ Other _____

Development Type:

☐ Residential: Units _____

Acres _____

☐ Office: Sq.ft. _____

Acres _____

Employees _____

☐ Commercial: _____

Sq.ft. unknown

Acres _____

☐ Industrial: Sq.ft. unknown

Acres _____

Employees _____

☐ Educational

☐ Recreational

☐ Water Facilities: Type _____

MGD _____

☐ Transportation: Type _____

Employees _____

☐ Mining: Mineral _____

☐ Power: Type _____

MW _____

☐ Waste Treatment: Type _____

MGD _____

☐ Hazardous Waste: Type _____

☒ Other: This is a stand-alone GPA and Rezone, with no associated development proposed.

Project Issues Discussed in Document:

☒ Aesthetic/Visual

☒ Agricultural Land

☒ Air Quality

☒ Archeological/Historical

☒ Biological Resources

☐ Coastal Zone

☐ Drainage/Absorption

☐ Economic/Jobs

☐ Fiscal

☒ Flood Plain/Flooding

☒ Forest Land/Fire Hazard

☒ Geologic/Seismic

☒ Minerals

☒ Noise

☒ Population/Housing Balance

☒ Public Services/Facilities

☒ Recreation/Parks

☐ Schools/Universities

☐ Septic Systems

☒ Sewer Capacity

☐ Soil Erosion/Compaction/Grading

☐ Solid Waste

☒ Toxic/Hazardous

☒ Traffic/Circulation

☒ Vegetation

☒ Water Quality

☒ Water Supply/Groundwater

☒ Wetland/Riparian

☒ Wildlife

☐ Growth Inducing

☒ Land Use

☒ Cumulative Effects

☒ Other Climate change/Greenhouse Gas Emissions

Present Land Use/Zoning/General Plan Designation:

Variable

Project Description: *(please use a separate page if necessary)*

The proposed project would result in revisions to the existing General Plan Land Use and zoning designations on private properties including their surrounding study areas, totaling approximately 13,000 acres, within 1,149 parcels throughout the unincorporated County and would result in increased residential densities of approximately 2,800 residential dwelling units above the number currently allowed by the existing General Plan. The project applies to the following Community Planning Areas (CPAs)/Subregional Planning Areas within the unincorporated area of San Diego County: Bonsall CPA, Crest-Dehesa CPA, Desert Subregion, Fallbrook CPA, Mountain Empire Subregion, North County Metro Subregion, Pala Pauma Subregion, San Dieguito CPA, and Valley Center CPA.

NOP Distribution List

SCH#

2015121012

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- ☐ Colorado River Board
Lisa Johansen
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Elizabeth Carpenter
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Eric Knight
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Dan Foster
- ☐ Central Valley Flood Protection Board
James Herota
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Ron Parsons
- ☒ Dept. of Parks & Recreation
Environmental Stewardship Section
- ☐ California Department of Resources, Recycling & Recovery
Sue O'Leary
- ☐ S.F. Bay Conservation & Dev't. Comm.
Steve McAdam
- ☒ Dept. of Water Resources
Nadell Gayou
- ☐ Fish and Game
Scott Flint
- ☐ Dept. of Fish & Wildlife
Environmental Services Division
- ☐ Fish & Wildlife Region 1
Curt Babcock

- ☐ Fish & Wildlife Region 1E
Laurie Harnsberger
- ☐ Fish & Wildlife Region 2
Jeff Drongesen
- ☐ Fish & Wildlife Region 3
Charles Amor
- ☐ Fish & Wildlife Region 4
Julie Vance
- ☒ Fish & Wildlife Region 5
Leslie Newton-Reed
Habitat Conservation Program
- ☐ Fish & Wildlife Region 6
Tiffany Ellis
Habitat Conservation Program
- ☐ Fish & Wildlife Region 6 I/M
Heidi Calvert
Inyo/Mono, Habitat Conservation Program
- ☐ Dept. of Fish & Wildlife M
George Isaac
Marine Region

Other Departments

- ☐ Food & Agriculture
Sandra Schubert
Dept. of Food and Agriculture
- ☐ Dept. of General Services
Public School Construction
- ☐ Dept. of General Services
Anna Garbeff
Environmental Services Section
- ☐ Delta Stewardship Council
Kevan Samsam
- ☐ Housing & Comm. Dev.
CEQA Coordinator
Housing Policy Division
- ☐ Independent Commissions, Boards
Delta Protection Commission
Michael Machado

- ☒ OES (Office of Emergency Services)
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Debbie Treadway
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Supervisor
- ☐ Santa Monica Bay Restoration
Guangyu Wang
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Cherry Jacques
- ☐ Cal State Transportation Agency CalSTA
- ☐ Caltrans - Division of Aeronautics
Philip Crimmins
- ☐ Caltrans - Planning
HQ LD-IGR
Terri Pencovic
- ☒ California Highway Patrol
Suzann Ikeuchi
Office of Special Projects
- ☐ Caltrans, District 1
Rex Jackman
- ☐ Caltrans, District 2
Marcelino Gonzalez
- ☐ Caltrans, District 3
Eric Federicks - South
Susan Zanchi - North
- ☐ Caltrans, District 4
Patricia Maurice
- ☐ Caltrans, District 5
Larry Newland
- ☐ Caltrans, District 6
Michael Navarro
- ☐ Caltrans, District 7
Nianna Watson

Cal EPA

- ☒ Air Resources Board
All Other Projects
Cathi Slaminski
- ☐ Transportation Projects
Nesamani Kalandiyur
- ☐ Industrial/Energy Projects
Mike Tollstrup
- ☒ State Water Resources Control Board
Regional Programs Unit
Division of Financial Assistance
- ☐ State Water Resources Control Board
Karen Larsen
Division of Drinking Water
- ☐ State Water Resources Control Board
Student Intern, 401 Water Quality Certification Unit
Division of Water Quality
- ☐ State Water Resources Control Board
Phil Crader
Division of Water Rights
- ☐ Dept. of Toxic Substances Control
CEQA Tracking Center
- ☐ Department of Pesticide Regulation
CEQA Coordinator

- ☐ Regional Water Quality Control Board (RWQCB)
RWQCB 1
Cathleen Hudson
North Coast Region (1)
- ☐ RWQCB 2
Environmental Document Coordinator
San Francisco Bay Region (2)
- ☐ RWQCB 3
Central Coast Region (3)
- ☐ RWQCB 4
Teresa Rodgers
Los Angeles Region (4)
- ☐ RWQCB 5S
Central Valley Region (5)
- ☐ RWQCB 5F
Central Valley Region (5)
Fresno Branch Office
- ☐ RWQCB 5R
Central Valley Region (5)
Redding Branch Office
- ☐ RWQCB 6
Lahontan Region (6)
- ☐ RWQCB 6V
Lahontan Region (6)
Victorville Branch Office
- ☐ RWQCB 7
Colorado River Basin Region (7)
- ☐ RWQCB 8
Santa Ana Region (8)
- ☒ RWQCB 9
San Diego Region (9)
- ☐ Other
- ☐ Conservancy



Edmund G. Brown Jr.
Governor

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



Ken Alex
Director

Notice of Preparation

December 3, 2015

To: Reviewing Agencies

Re: Property Specific Requests General Plan Amendment
SCH# 2015121012

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Scott Morgan
Director, State Clearinghouse

Attachments
cc: Lead Agency

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Lead Agency San Diego County

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Lead Agency Contact

Name Peter Eichar
Agency San Diego County
Phone (858) 495-5524 **Fax**
email
Address 5510 Overland Avenue, Suite 110
City San Diego **State** CA **Zip** 92123

Project Location

County San Diego
City
Region
Cross Streets
Lat / Long
Parcel No. Multiple
Township **Range** **Section** **Base**

Proximity to:

Highways multiple
Airports
Railways
Waterways various
Schools
Land Use

Project Issues Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Minerals; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Sewer Capacity; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Wildlife; Landuse; Cumulative Effects; Other Issues

Reviewing Agencies Resources Agency; Cal Fire; Department of Parks and Recreation; Department of Water Resources; Department of Fish and Wildlife, Region 5; Office of Emergency Services, California; Native American Heritage Commission; California Highway Patrol; Caltrans, District 11; Air Resources Board; State Water Resources Control Board, Division of Financial Assistance; Regional Water Quality Control Board, Region 9

Date Received 12/03/2015 **Start of Review** 12/03/2015 **End of Review** 01/04/2016

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For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

SCH # pending

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Lead Agency: County of San Diego, Planning & Development Services

Contact Person: Peter Eichar

Mailing Address: 5510 Overland Avenue, Suite 110

Phone: 858-495-5524

City: San Diego

Zip: 92123

County: San Diego

Project Location: County: San Diego

City/Nearest Community: multiple

Cross Streets:

Zip Code:

Lat. / Long.: ° ' " N/ ° ' " W

Total Acres:

Assessor's Parcel No.: Multiple

Section:

Twp.:

Range:

Base:

Within 2 Miles: State Hwy #: multiple

Waterways: various

Airports:

Railways:

Schools:

Document Type:

CEQA:

☒ NOP

☐ Early Cons

☐ Neg Dec

☐ Mit Neg Dec

☐ Draft EIR

☐ Supplement/Subsequent EIR

(Prior SCH No.)

Other

NEPA:

☐ NOI

☐ EA

☐ Draft EIS

☐ FONSI

Other:

☐ Joint Document

☐ Final Document

☐ Other

Local Action Type:

☐ General Plan Update

☒ General Plan Amendment

☐ General Plan Element

☐ Community Plan

☐ Specific Plan

☐ Master Plan

☐ Planned Unit Development

☐ Site Plan

☒ Rezone

☐ Prezone

☐ Use Permit

☐ Land Division (Subdivision, etc.)

☐ Annexation

☐ Redevelopment

☐ Coastal Permit

☐ Other

Development Type:

☐ Residential: Units

Acres

☐ Office: Sq.ft.

Acres

Employees

☐ Commercial: Sq.ft.

Acres

Employees

☐ Industrial: Sq.ft.

Acres

Employees

☐ Educational

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☒ Other: This is a stand-alone GPA and Rezone, with no associated development proposed.

☐ Water Facilities: Type

MGD

☐ Transportation: Type

Employees

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☐ Power: Type

MW

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MGD

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Project Issues Discussed in Document:

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☒ Public Services/Facilities

☒ Recreation/Parks

☐ Schools/Universities

☐ Septic Systems

☒ Sewer Capacity

☐ Soil Erosion/Compaction/Grading

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☒ Other Climate change/Greenhouse Gas Emissions

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Variable

Project Description: (please use a separate page if necessary)

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☐ Fish & Wildlife Region 3
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Julie Vance

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Leslie Newton-Reed
Habitat Conservation Program

☐ Fish & Wildlife Region 6
Tiffany Ellis
Habitat Conservation Program

☐ Fish & Wildlife Region 6 I/M
Heidi Calvert
Inyo/Mono, Habitat Conservation Program

☐ Dept. of Fish & Wildlife M
George Isaac
Marine Region

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Dept. of Food and Agriculture

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Public School Construction

☐ Dept. of General Services
Anna Garbeff
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CEQA Coordinator
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Supervisor

☐ Santa Monica Bay Restoration
Guangyu Wang

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Terri Pencovic

☒ California Highway Patrol
Suzann Ikeuchi
Office of Special Projects

Dept. of Transportation

☐ Caltrans, District 1
Rex Jackman

☐ Caltrans, District 2
Marcelino Gonzalez

☐ Caltrans, District 3
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Patricia Maurice

☐ Caltrans, District 5
Larry Newland

☐ Caltrans, District 6
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☐ Department of Pesticide Regulation
CEQA Coordinator

Regional Water Quality Control Board (RWQCB)

☐ RWQCB 1
Cathleen Hudson
North Coast Region (1)

☒ RWQCB 2
Environmental Document Coordinator
San Francisco Bay Region (2)

☐ RWQCB 3
Central Coast Region (3)

☐ RWQCB 4
Teresa Rodgers
Los Angeles Region (4)

☐ RWQCB 5S
Central Valley Region (5)

☐ RWQCB 5F
Central Valley Region (5)
Fresno Branch Office

☐ RWQCB 5R
Central Valley Region (5)
Redding Branch Office

☐ RWQCB 6
Lahontan Region (6)

☐ RWQCB 6V
Lahontan Region (6)
Victorville Branch Office

☐ RWQCB 7
Colorado River Basin Region (7)

☐ RWQCB 8
Santa Ana Region (8)

☒ RWQCB 9
San Diego Region (9)

☐ Other _____

☐ _____
Conservancy



401 B Street, Suite 800
San Diego, CA 92101-4231
(619) 699-1900
Fax (619) 699-1905
sandag.org

February 5, 2016

File Number 3330300

Mr. Peter Eichar
County of San Diego
5510 Overland Avenue, Suite 310
San Diego, CA 92123

Dear Mr. Eichar:

SUBJECT: Comments on the Property Specific Requests General Plan
Amendment and Rezone Notice of Preparation
(Project No. PDS2012-3800-12-005; PDS2014-REZ-14-006)

Thank you for the opportunity to comment on the Property Specific Requests General Plan Amendment and Rezone Notice of Preparation, which proposes revisions to the existing General Plan land use and zoning designations on 1,149 parcels throughout San Diego county.

Our comments are based on policies included in San Diego Forward: The Regional Plan (Regional Plan) and are submitted from a regional perspective emphasizing the need for land use and transportation coordination and implementation of smart growth and sustainable development principles. The Regional Plan sets forth a multimodal approach to reaching the region's transportation needs. Therefore, it is recommended that the traffic analysis in the Draft Environmental Impact Report (EIR) consider the needs of motorists, transit riders, pedestrians, and bicyclists, and the implementation of a robust Transportation Demand Management (TDM) Program. The San Diego Association of Governments (SANDAG) recommends that the following comments be addressed in the EIR:

Transportation Demand Management

Please consider integrating TDM measures into the County's General Plan amendment and rezone process. This will encourage the use of alternative travel modes that can assist with relieving traffic congestion in and around the proposed project areas. Promotion of TDM programs and services, such as the SANDAG Vanpool Program, online ride-matching, the Guaranteed Ride Home Program, and Park & Ride facilities can help reduce single-occupancy vehicle trips made by residents. Information on regional TDM programs and services can be accessed through www.iCommuteSD.com, and the SANDAG TDM Division can assist with the integration of these measures as part of the preparation of the General Plan amendment and rezones.

MEMBER AGENCIES

Cities of
Carlsbad
Chula Vista
Coronado
Del Mar
El Cajon
Encinitas
Escondido
Imperial Beach
La Mesa
Lemon Grove
National City
Oceanside
Poway
San Diego
San Marcos
Santee
Solana Beach
Vista
and
County of San Diego

ADVISORY MEMBERS

Imperial County
California Department
of Transportation
Metropolitan
Transit System
North County
Transit District
United States
Department of Defense
San Diego
Unified Port District
San Diego County
Water Authority
Southern California
Tribal Chairmen's Association
Mexico

Regional Growth Forecast

The proposed amendments to the County's General Plan were not included in the Series 13 Regional Growth Forecast used in the Regional Plan, which relies on land use data provided by County staff in 2013-2014. A key Regional Plan goal is to focus future population and job growth away from rural areas and closer to existing and planned job centers and public facilities to preserve open space and to make more efficient use of existing urban infrastructure. If the proposed General Plan amendments and rezones are approved, the proposed land use changes would need to be incorporated and evaluated in the next update to the Regional Growth Forecast.

Smart Growth Opportunity Areas

A key goal of the Regional Plan is to focus growth in smart growth opportunity areas. With some of the proposed General Plan amendments and rezoning, there are opportunities to better link land use and transportation/transit. The proposed project is located within some existing/planned Rural Villages identified on the Smart Growth Concept Map (CN-1, CN-3), as well as a Potential Rural Village (CN-2). The Rural Village designation calls for a residential density of 10.9 dwelling units per acre. Additionally, certain parcels in the proposed project are near an existing/planned mixed-use transit corridor (ES-3), which calls for a residential density of 25 dwelling units per acre. The existing/planned Rural Villages have a low-frequency local bus in service, while the potential Rural Village is planned to have a peak-period *Rapid* transit bus service to be phased in by 2018. However, enhanced planning will be required to ensure that this bus station is located within the smart growth area boundary. It is strongly encouraged that the General Plan amendment and rezones provide connections and facilitate access to these public transit services.

Due to the location of the proposed General Plan amendments and rezones, most trips are expected to be auto-based and could have a significant impact on the regional transportation system. Incorporating complete street design elements or improved bike access to local destinations can help to mitigate the traffic effects and provide mobility options for residents.

Other Considerations

We encourage, where appropriate, consideration of the following tools in evaluating this project based on these SANDAG publications (which can be found on our website at: sandag.org/igr):

1. Designing for Smart Growth, Creating Great Places in the San Diego Region
2. Planning and Designing for Pedestrians, Model Guidelines for the San Diego Region
3. Trip Generation for Smart Growth
4. Parking Strategies for Smart Growth
5. Regional Multimodal Transportation Analysis: Alternative Approaches for Preparing Multimodal Transportation Analysis in Environmental Impact Reports
6. Riding to 2050, the San Diego Regional Bike Plan
7. SANDAG Regional Parking Management Toolbox

When available, please send the Draft EIR to:

Intergovernmental Coordination
c/o SANDAG
401 B Street, Suite 800
San Diego, CA 92101

We appreciate the opportunity to comment on this project. If you have any questions or concerns regarding our comments on this project, please contact me at (619) 699-1943 or via email at susan.baldwin@sandag.org.

Sincerely,

A handwritten signature in dark ink, reading "Susan B. Baldwin", followed by a long horizontal flourish line extending to the right.

SUSAN B. BALDWIN, AICP
Senior Regional Planner

SBA/KHE/kcu



VALLECITOS WATER DISTRICT

A PUBLIC AGENCY

201 Vallecitos de Oro • San Marcos, California • 92069-1453 Telephone (760) 744-0460

February 1, 2016

Mr. Peter Eichar
County of San Diego
Planning Division
5510 Overland Ave., #310
San Diego, CA 92123

**RE: PROPERTY SPECIFIC REQUESTS GENERAL PLAN AMENDMENT & REZONE
NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT (SEIR)**

Dear Mr. Eichar:

Thank you for the opportunity to review the Property Specific Requests (PSRs) General Plan Amendment (GPA) to the San Diego County General Plan and the NOP of a Subsequent Environmental Impact Report (SEIR) to implement the County of San Diego General Plan Update (General Plan). The General Plan serves as a policy guide for determining the appropriate physical development and character of the County of San Diego planning area. The General Plan establishes the maximum level of development that can occur within this planning area, including areas serviced by the Vallecitos Water District.

The General Plan highlights the areas that have been identified for change over the next two decades. The Vallecitos Water District (District) provides water and/or sewer services to a portion of the County of San Diego. In addition the District has a major pipeline (the San Marcos Interceptor) that travels from the City of San Marcos to the Encina Wastewater Treatment Facility in the City of Carlsbad. The facility treats wastewater from San Marcos, Escondido, Vista and Carlsbad areas within the Vallecitos District Boundaries.

Water and sewer service will be provided under the rules and regulations of the District, under normal operating conditions after all required fees have been paid and all conditions of the District have been satisfied.

Any existing District pipelines located within the areas that are in conflict with proposed development will require relocation within the public right-of-way or District easements. District policy requires that all newly created parcels have frontage on a District main and extensions of facilities to serve each newly created parcel will be required. The exact location of the main line extensions and relocation will be determined during the planning

stage for each District boundary area development.

Water or sewer facilities not within the public right-of-way will require a minimum 20-foot easement granted to the District. The District may require additional easements through the new development or private properties for future extensions. The developer for each area is responsible for obtaining any easements including expenses incurred. Joint use of these easements is not allowed by the District and easements for storm drain and other facilities should be analyzed early so that adequate sizing of easements for all facilities and various agencies is provided.

No structures will be allowed over District facilities. This includes, but is not limited to, walls, entrance medians, landscaping, gates, guard house structures, curbs and gutters, and driveways. For protection of District facilities, any areas with water pressures near or higher than 150 psi will require water pressure regulators between the water main and the metering device.

The District adopted Ordinance No. 162 on May 6, 2009, which identifies various water conservation measures including mandatory conservation, the curtailment of availability letters and limiting new service connections as it relates to current and future drought conditions.

On April 1, 2015, Governor Brown issued an Executive Order directing that the State Water Resources Control Board impose restrictions on urban water users to achieve a statewide 25% reduction in potable urban water use. On May 5, 2015, the State adopted new regulations and mandated a 24% reduction in potable water use for the District from 2013 demands.

On May 20, 2015, the District's Board of Directors adopted emergency drought restrictions under Ordinance 195 (to supplement Ordinance 162) to limit all outdoor irrigation, excluding certified agricultural or commercial growers, to 2 unassigned days per week/8 minutes per station and additionally as follows:

- The use of potable water for irrigation of ornamental turf within public street rights of ways including adjacent landscape strips.
- The use of potable water outside of newly constructed homes and buildings inconsistent with regulations established by the California Building Standards Commission.
- The application of potable water to outdoor landscaping during and after 48 hours of a measurable rain event.

Mr. Peter Eichar
COSD GPA of PSRs and NOP of Subsequent Environmental Impact Report (SEIR)
January 5, 2016
Page 3

The District currently obtains 100% of its water supply from the San Diego County Water Authority, which in turn obtains most of its water from the Metropolitan Water District of Southern California. Therefore, the District's primary water sources are from northern California via the California State Water Project and from the Colorado River via the Colorado River Aqueduct. The Vallecitos Water District is currently a member agency in the Poseidon Resources Desalination project. This project includes a 30 year water purchase agreement through the San Diego County Water Authority for 3,500 acre-feet per year of desalinated water.

At this time, the District does not have recycled water available in the County of San Diego planning area. Furthermore, no plan exists for extending recycled water infrastructure or availability into the County of San Diego planning area through Year 2030.

Conclusion

The District staff has been in contact with Mr. Peter Eichar in an effort to be provided with a more precise depiction of the area of change within the District's boundary. Mr. Eichar generously provided the District with a map that shows all land use changes within the District boundaries. The District was also supplied with a corresponding table of the land use designation and a list of the effected assessor parcel numbers. The information provided by the County of San Diego and Mr. Eichar stated that the County is planning on changing the General Plan Update land use designations for certain properties within the District's boundary. According to the information received there will be an approximate increase of 1025 dwelling units within the Districts' boundary.

The Vallecitos Water District requests notification of and inclusion in any future public review and requests copies of any related studies and environmental documents when they become available.

If you have any questions, please contact the undersigned at (760) 744-0460 or by e-mail at istichter@vwd.org.

Sincerely,



Ingrid Stichter
Engineering Technician II
VALLECITOS WATER DISTRICT

cc: Robert Scholl, Senior Engineer Development Services
James Gumpel, District Engineer

From: Royalviewranch@aol.com
To: [Eichar, Peter](#)
Cc: [Wardlaw, Mark](#); [Gretler, Darren M](#)
Subject: PSR"s, GPA comment
Date: Friday, December 04, 2015 9:25:48 AM

Hello Peter,

I got the notice in the mail yesterday.

I was just wondering why the County has been working on this for 4 + years and now all of a sudden, in the middle of the Christmas/ New Year season, when everyone is preoccupied, they drop this 30 day comment period/ Scoping Meeting on us.

They do it all the time. I guess I should not be surprised. Thanks for your time.

Karen Binns

From: [Kevin Downey](#)
To: [Eichar, Peter](#)
Subject: Property specific requests general plan amendment and rezone
Date: Sunday, January 03, 2016 5:49:25 PM

Hello Peter,

I received the letter from the county regarding project name: Property Specific Requests General Plan Amendment and Rezone; Project Number(s): PDS2012-3800-12-005; PDS2014-REZ-14-006 and your email was given for comments.

The reason I moved to 654 Stewart Canyon Road was because of the seclusion. I do not support increasing the number of homes per acre. I currently have an event venue near my house that already makes too much noise and increases traffic. Repeated calls to the owners and management have not helped and I believe they are one of the locations trying for this increase in homes per acre. They currently have a residence near us and I would hate to see them add any more.

I appreciate the consideration the county is giving residence that live near these locations.

Sincerely,

Kevin and Melody Downey

Sandra Farrell
1900 Esplendido Ave
Vista, CA 92084

February 14, 2016

Peter Eichar
Dept. of Planning and Development Services
5510 Overland Ave
San Diego CA 92123
Peter.Eichar@sdcounty.ca.gov

pds.advanceplanning@sdcounty.ca.gov

**RE: NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT for
Property Specific Requests General Plan Amendment and Rezone**

(GPA 12-005; REZ 14-006) Project Numbers. PDS2012-3800-12-005; PDS2014-REZ-14-006ENV.
REVIEW NUMBER: PDS2012-ER-12-00-003; SCH#2015121012

Dear Mr. Eichar,

Thank you very much for this opportunity to provide input to this Notice of Preparation for Property Specific Requests, General Plan Amendment and Rezone. Upon review of the NOP for the Supplemental Environmental Impact Report (SEIR) to amend the County General Plan, it appears the County is using public money to accommodate a few property owner specific requests. But for the desires of specific property owners there is no need for this General Plan Amendment (GPA) or associated costs. In addition, many of these Property Specific Requests (PSRs) are connected with a development project and this GPA will bring the property density in line with the density of a proposed project.

Although the SEIR is to study the impacts associated with amending an existing General Plan and not to identify impacts connected with project specific plans, the goal of many of the PSRs is to bring the density up so that it matches a proposed development project. The projects in many cases are linked to the proposed GPA. General Plans tend to not get into specific project impacts because those impacts can't be known until a project is proposed and a project Environmental Impact Report (EIR) is done. However, some of the PRSs have significant amounts of environmental documentation. The impacts and mitigation measures are known. It would be disingenuous of the County and not keeping with the spirit of CEQA, if the County did not include past environmental documentation. The County should include any known, foreseeable, or impacts likely to occur due to implementation of the Property Specific Requests (PSRs) that are to be studied for this General Plan Amendment (GPA). Any reasonable person would want to know of previously identified impacts that could be created if the GPA is implemented.

For instance, the County knows of existing environmental documentation for projects proposed for NC22 and NC42. For both these projects there is a long history of concerns raised on proposed projects for these two PSRs. Therefore the SEIR for the GPA cannot use the language of a program EIR or state that impacts need to be addressed at a project level when they are revealed since there is existing documentation of the impacts already part of public record.

I would like the SEIR to cover the following:

1. To include past environmental documentation on the areas of the PSRs that have development projects or have existing environmental studies so that the decision makers and public can understand how the GPA relates to the land and any in-process or proposed development projects located within each of the PSRs.
2. To include past comments submitted by governmental agencies associated with in-process or proposed development projects located within each of the PSRs so decision makers and public can understand how the implementation of the GPA may:
 - a. allow a project to move forward that could result in significant negative impacts
 - b. be in conflict with other governmental agency policies, planning, and/or recommendations.

For NC22 there are comment letters from the Wildlife Agencies, LAFCO, EPA and the County that go back to 1990 for a project the property owner has been processing with the City of San Marcos and may want to process the project with the County. This project is called the San Marcos Highlands.

3. To include past comments submitted to in-process or proposed development projects located in the PSRs from non-governmental organizations and the public so the decision makers and public can understand how implementing the GPA may create significant negative impacts for the environment and/or the community. For NC22 please see comments submitted for the San Marcos Highlands project. For NC42 there are not only comments submitted for the project known as Merriam Mountains but also comments submitted to the Draft North County MSCP specific to NC42.
4. The SEIR should discuss why the line running at a diagonal through NC22 does not follow any existing property line. It should show how the density change supports an existing project by including a map graphic showing the NC22 area with the San Marcos Highlands project overlaid so that decision makers and the public can see how the PSR matches a development plan for a project currently being proposed through the City of San Marcos. The SEIR should also look at the project showing how much is being proposed outside the City of San Marcos and discuss the impact of annexation and urbanization on adjacent rural county areas.
5. Because I live in the "Study Area" created for NC22, I would like the SEIR to explain why the east end of Esplendido Avenue is part of the Property Specific Request. To my knowledge, no one on Esplendido asked to part of a study area. The SEIR needs to discuss if the formation of the Study Areas was done to address a problem of "Spot Zoning" created by NC22.

6. The SEIR should also explain how many of the parcels on Esplendido that are in the Study Area can actually build to the density being considered in this GPA. Many of the parcels on Esplendido are on steep slopes and have limited access.
7. The SEIR needs to identify the likelihood of the areas included in the Study Area of actually building to the density requested since the properties on the east end of Esplendido do not receive services such as sewer or natural gas and the cost to build those services to the east end of Esplendido is not likely to occur due to cost. Also, water pressure is a problem along the homes on the east end of Esplendido so the SEIR needs to discuss how services could be provided to serve a higher density.
8. The SEIR should note if the increase in density proposed in the PSRs and Study Areas will create unrealistic expectations by property owners to develop properties beyond the carrying capacity of the land.
9. The SEIR needs to study the impact of increasing the density in the Study Areas for NC22 will have on wildlife corridors in the area. The increased density in the Study Areas may preclude needed wildlife movement.
10. The SEIR needs to study the impact of increasing the density in NC42 regarding wildlife movement and connectivity.
11. The SEIR needs to look at habitat planning for the North County. The SEIR should study delay of implementation of this GPA until the North County MSCP is completed so that the decision makers and the public know the impact of the PSRs on habitat planning in the area.

I appreciate the opportunity to submit comments to the Notice of Preparation to the General Plan Amendment for the Property Specific Requests. Please let me know if you need any environmental documents referenced in this document. You can reach me at slfarrell@cox.net or at 760-415-3349

Sincerely,

Sandra Farrell

Scott Graves
2797 Vistamonte Glen
Escondido, CA 92027

February 4, 2016

Planning & Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

Dear Members of the San Diego County Planning & Development Services,

On December 17, 2015 I attended a County of San Diego scoping meeting regarding a Notice of Preparation (NOP) to make General Plan Amendments (GPAs) for 43 Property Specific Requests (PSRs). All 43 of these requests call for zoning changes to increase density, mostly in rural North County San Diego. In total, these requests call for up to an additional 2,800 dwellings above what the San Diego General Plan has approved. In my opinion, a reasonable person would agree that consideration of these PSRs goes counter to San Diego County's General Plan elements of land use, housing, circulation, conservation, open space, safety, and noise.

I am concerned that after 13 years, 18 million dollars, and countless public meetings, developers and politicians are attempting to subvert the General Plan. It should be noted that the Board of Supervisors directed the Planning Department to initiate these GPA/PSR studies less than 1 year after the General Plan Update was adopted, at a projected cost of at least an additional 1.5 million dollars to taxpayers (Planning Department figures).

http://www.sandiegocounty.gov/content/dam/sdc/pds/gpupdate/docs/BOS_Jun2012/Property_Specific_Requests_Workplan_BL.pdf

In fact, workshops addressing PSRs were held in a little over 4 months after the General Plan was adopted. I find it concerning that the General Plan supposedly got zoning density "wrong", so quickly, in an area encompassing approximately 13,000 acres.

I suspect that developers' and corporate interests, not citizens, initiated the majority of these requests. When matching Valley Center (VC7+) assessor parcel numbers (APNs), with San Diego County Treasurer Tax Collector records, and California Secretary of State Business records, it appears that Accretive Investments Incorporated has significant ownership and development interests in the study area. Please refer to VC7+ spread sheet and Planning & Development Services Disclosures attachments.

Accretive Investments agent for service of process, Donald R. Faye, was previously indicted by a San Diego federal grand jury on 10 felony counts of conspiracy and fraud. See (USA v. Dani, et al.) Southern District of California (San Diego) CRIMINAL DOCKET FOR CASE #: 3:94-cr-01413-B-2

http://articles.latimes.com/1994-12-16/business/fi-9734_1_homefed-bank

In my opinion, this convoluted acquisition practice and subsequent zoning requests appears intended to elude public scrutiny, and regulatory oversight. Given the recent Fair Political Practices Commission's (FPCC) advisory letter regarding Accretive's Lilac Hills Ranch project, the VC7+ requests will once again embroil Supervisor Horn in a potential conflict of interest.

As demonstrated by the low public attendance of the NOP meeting, I am concerned that the drivers behind these upzoning changes are developers and their direct and indirect financial political contributions, not the general public. I feel that the Board of Supervisors is in essence, asking San Diego taxpayers to bankroll developers' goals of increased zoning density.

Please respect the General Plan, and the will of San Diego voters.

Respectfully,

Scott Graves

Attachment P – Ownership Disclosure



County of San Diego, Planning & Development Services
**APPLICANT'S DISCLOSURE OF
 OWNERSHIP INTERESTS ON
 APPLICATION FOR ZONING PERMITS/
 APPROVALS**
 ZONING DIVISION

Record ID(s) _____

Assessor's Parcel Number(s) See Exhibit A

Ordinance No. 4544 (N.S.) requires that the following information must be disclosed at the time of filing of this discretionary permit. The application shall be signed by all owners of the property subject to the application or the authorized agent(s) of the owner(s), pursuant to Section 7017 of the Zoning Ordinance. **NOTE:** Attach additional pages if necessary.

- A. List the names of all persons having any *ownership interest* in the property involved.

See Exhibit B

- B. If any person identified pursuant to (A) above is a corporation or partnership, list the names of all individuals owning more than 10% of the shares in the corporation or owning any partnership interest in the partnership.

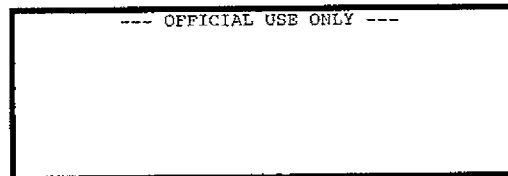
See Exhibit C

- C. If any person identified pursuant to (A) above is a non-profit organization or a trust, list the names of any persons serving as director of the non-profit organization or as trustee or beneficiary or trustor of the trust.

N/A

NOTE: Section 1127 of The Zoning Ordinance defines **Person** as: "Any individual, firm, copartnership, joint venture, association, social club, fraternal organization, corporation, estate, trust, receiver syndicate, this and any other county, city and county, city, municipality, district or other political subdivision, or any other group or combination acting as a unit."

R. Randy Goodson
 Signature of Applicant
R. Randy Goodson
 Print Name
20 July 15
 Date



5510 OVERLAND AVE, SUITE 110, SAN DIEGO, CA 92123 • (858) 565-5981 • (888) 267-8770

<http://www.sdcountry.ca.gov/pds>



Accretive Investments, Inc.
Lilac Hills Ranch - Disclosure of Ownership
Exhibit A

APN's	APN's	APN's
1 128-280-27	21 129-010-62	41 129-010-72
2 128-290-07	22 128-290-51	42 129-011-16
3 128-440-03	23 129-010-73	43 128-290-69
4 128-440-02	24 129-010-74	44 128-290-70
5 128-290-74	25 129-010-75	45 128-290-71
6 128-280-46	26 129-010-76	46 128-290-72
7 127-072-14	27 128-290-54	47 128-440-14
8 128-280-42	28 128-290-55	48 128-440-15
9 127-072-20	29 128-290-56	49 128-440-06
10 128-440-17	30 128-290-57	50 128-280-37
11 128-440-18	31 128-290-75	51 128-440-05
12 128-440-19	32 128-290-58	52 128-440-22
13 128-440-20	33 128-290-59	53 128-440-23
14 128-440-21	34 128-290-60	54 128-280-10
15 128-440-01	35 128-290-61	55 128-290-09
16 127-072-47	36 128-290-11	56 128-290-10
17 127-072-38	37 129-010-68	57 129-011-15
18 127-072-40	38 129-010-69	58 129-300-09
19 127-072-41	39 129-010-70	59 129-300-10
20 127-072-46	40 129-010-71	

Accretive Investments, Inc.
Lilac Hills Ranch - Disclosure of Ownership
Exhibit B

Names of all Owners

- 1 Shirey Falls, LP
- 2 Lilac Creek Estates, LP
- 3 Alligator Pears, LP
- 4 Gopher Canyon, LP
- 5 Karla V. Davitt
- 6 Joseph J. Davitt
- 7 Joseph M. Davitt
- 8 Andrew J. Davitt
- 9 Linda C. Carlson as Trustee of the Linda C. Carlson Trust, of 1996
- 10 Timothy and Zita Mar Revocable Trust dated October 4, 2000
- 11 ZNN Limited Partnership, a California limited partnership
- 12 Zita Marjorie Z. Mar
- 13 Noli C. Zosa
- 14 Noel F. Zosa
- 15 Wayne A. Nutt
- 16 Glenda Nutt
- 17 Geraldine T. Jones, Trustee of the Geraldine and Frank Jones Trust
- 18 Geigert Ranch, LLC

Accretive Investments, Inc.

Lilac Hills Ranch - Disclosure of Ownership

Exhibit C

Names of all known owners of more than 10% of LP Owners on Ex B

1 LHR Investment Company, LLC



Dan McAllister

SAN DIEGO COUNTY TREASURER-TAX COLLECTOR
















Property Tax Information Search Results

The property being searched may have additional tax bills that do not appear in the search results using this search criteria.

Step 2 of 7 - Search Results

Secured

Parcel Number	Owner	Inst	Action	Status	Amount Due	Late After
127-072-14-00 (SecuredDetails.aspx?parcelNumber=1270721400)	SHIREY FALLS L P	1st		PAID ON 12/10	\$0.00	12/10/15
		2nd	2nd	DUE	\$142.51	04/11/16
127-072-20-00 (SecuredDetails.aspx?parcelNumber=1270722000)	SHIREY FALLS L P	1st		PAID ON 12/10	\$0.00	12/10/15
		2nd	2nd	DUE	\$7,322.40	04/11/16
127-072-38-00 (SecuredDetails.aspx?parcelNumber=1270723800)	SHIREY FALLS L P	1st		PAID ON 12/10	\$0.00	12/10/15
		2nd	2nd	DUE	\$3,778.12	04/11/16
127-072-40-00 (SecuredDetails.aspx?parcelNumber=1270724000)	SHIREY FALLS L P	1st		PAID ON 12/10	\$0.00	12/10/15
		2nd	2nd	DUE	\$1,846.93	04/11/16
127-072-41-00 (SecuredDetails.aspx?parcelNumber=1270724100)	SHIREY FALLS L P	1st		PAID ON 12/10	\$0.00	12/10/15
		2nd	2nd	DUE	\$2,147.92	04/11/16
127-072-50-00 (SecuredDetails.aspx?parcelNumber=1270725000)	SHIREY FALLS L P	1st		PAID ON 12/10	\$0.00	12/10/15
		2nd	2nd	DUE	\$1,468.09	04/11/16
127-360-04-00 (SecuredDetails.aspx?parcelNumber=1273600400)	RITSON ROAD LP	1st		PAID ON 12/10	\$0.00	12/10/15
		2nd	2nd	DUE	\$247.57	04/11/16
127-360-06-00 (SecuredDetails.aspx?parcelNumber=1273600600)	RITSON ROAD LP	1st		PAID ON 12/10	\$0.00	12/10/15
		2nd	2nd	DUE	\$952.15	04/11/16
127-360-07-00 (SecuredDetails.aspx?parcelNumber=1273600700)	RITSON ROAD LP	1st		PAID ON 12/10	\$0.00	12/10/15






		2nd	 2nd	DUE	\$170.04	04/11/16
128-280-27-00 (SecuredDetails.aspx?parcelNumber=1282802700)	SHIREY FALLS L P	1st		PAID ON 12/10	\$0.00	12/10/15
		2nd	 2nd	DUE	\$2,011.37	04/11/16
128-280-42-00 (SecuredDetails.aspx?parcelNumber=1282804200)	SHIREY FALLS L P	1st		PAID ON 12/10	\$0.00	12/10/15
		2nd	 2nd	DUE	\$2,963.93	04/11/16
128-280-46-00 (SecuredDetails.aspx?parcelNumber=1282804600)	SHIREY FALLS L P	1st		PAID ON 12/10	\$0.00	12/10/15
		2nd	 2nd	DUE	\$3,856.27	04/11/16
128-290-07-00 (SecuredDetails.aspx?parcelNumber=1282900700)	SHIREY FALLS L P	1st		PAID ON 12/10	\$0.00	12/10/15
		2nd	 2nd	DUE	\$2,965.66	04/11/16
128-290-11-00 (SecuredDetails.aspx?parcelNumber=1282901100)	ALLIGATOR PEARS L P	1st		PAID ON 12/10	\$0.00	12/10/15
		2nd	 2nd	DUE	\$422.07	04/11/16
128-290-51-00 (SecuredDetails.aspx?parcelNumber=1282905100)	LILAC CREEK ESTATES L P	1st		PAID ON 12/10	\$0.00	12/10/15
		2nd	 2nd	DUE	\$10,087.44	04/11/16
128-290-54-00 (SecuredDetails.aspx?parcelNumber=1282905400)	ALLIGATOR PEARS L P	1st		PAID ON 12/10	\$0.00	12/10/15
		2nd	 2nd	DUE	\$750.99	04/11/16
128-290-55-00 (SecuredDetails.aspx?parcelNumber=1282905500)	ALLIGATOR PEARS L P	1st		PAID ON 12/10	\$0.00	12/10/15
		2nd	 2nd	DUE	\$767.41	04/11/16
128-290-56-00 (SecuredDetails.aspx?parcelNumber=1282905600)	ALLIGATOR PEARS L P	1st		PAID ON 12/10	\$0.00	12/10/15
		2nd	 2nd	DUE	\$763.67	04/11/16
128-290-57-00 (SecuredDetails.aspx?parcelNumber=1282905700)	ALLIGATOR PEARS L P	1st		PAID ON 12/10	\$0.00	12/10/15
		2nd	 2nd	DUE	\$879.71	04/11/16
128-290-58-00 (SecuredDetails.aspx?parcelNumber=1282905800)	ALLIGATOR PEARS L P	1st		PAID ON 12/10	\$0.00	12/10/15
		2nd	 2nd	DUE	\$1,012.80	04/11/16
128-290-59-00 (SecuredDetails.aspx?parcelNumber=1282905900)	ALLIGATOR PEARS L P	1st		PAID ON 12/10	\$0.00	12/10/15
		2nd	 2nd	DUE	\$792.49	04/11/16
128-290-60-00 (SecuredDetails.aspx?parcelNumber=1282906000)	ALLIGATOR PEARS L P	1st		PAID ON 12/10	\$0.00	12/10/15
		2nd	 2nd	DUE	\$476.09	04/11/16
128-290-61-00 (SecuredDetails.aspx?parcelNumber=1282906100)	ALLIGATOR PEARS L P	1st		PAID ON 12/10	\$0.00	12/10/15
		2nd	 2nd	DUE	\$475.31	04/11/16

128-290-62-00 (SecuredDetails.aspx?parcelNumber=1282906200)	RITSON ROAD LP	1st		PAID ON 12/10	\$0.00	12/10/15
		2nd	2nd	DUE	\$90.03	04/11/16
128-290-74-00 (SecuredDetails.aspx?parcelNumber=1282907400)	SHIREY FALLS L P	1st		PAID ON 12/10	\$0.00	12/10/15
		2nd	2nd	DUE	\$2,209.36	04/11/16
128-290-75-00 (SecuredDetails.aspx?parcelNumber=1282907500)	ALLIGATOR PEARS L P	1st		PAID ON 12/10	\$0.00	12/10/15
		2nd	2nd	DUE	\$1,826.52	04/11/16
128-290-78-00 (SecuredDetails.aspx?parcelNumber=1282907800)	ALLIGATOR PEARS L P	1st		PAID ON 12/10	\$0.00	12/10/15
		2nd	2nd	DUE	\$377.55	04/11/16
128-440-01-00 (SecuredDetails.aspx?parcelNumber=1284400100)	SHIREY FALLS L P	1st		PAID ON 12/10	\$0.00	12/10/15
		2nd	2nd	DUE	\$2,590.39	04/11/16
128-440-02-00 (SecuredDetails.aspx?parcelNumber=1284400200)	SHIREY FALLS L P	1st		PAID ON 12/10	\$0.00	12/10/15
		2nd	2nd	DUE	\$2,813.92	04/11/16
128-440-03-00 (SecuredDetails.aspx?parcelNumber=1284400300)	SHIREY FALLS L P	1st		PAID ON 12/10	\$0.00	12/10/15
		2nd	2nd	DUE	\$1,780.85	04/11/16
128-440-07-00 (SecuredDetails.aspx?parcelNumber=1284400700)	RITSON ROAD LP	1st		PAID ON 12/10	\$0.00	12/10/15
		2nd	2nd	DUE	\$2,584.47	04/11/16
128-440-11-00 (SecuredDetails.aspx?parcelNumber=1284401100)	RITSON ROAD LP	1st		PAID ON 12/10	\$0.00	12/10/15
		2nd	2nd	DUE	\$1,996.76	04/11/16
128-440-17-00 (SecuredDetails.aspx?parcelNumber=1284401700)	SHIREY FALLS LP	1st		PAID ON 12/10	\$0.00	12/10/15
		2nd	2nd	DUE	\$2,676.01	04/11/16
128-440-18-00 (SecuredDetails.aspx?parcelNumber=1284401800)	SHIREY FALLS LP	1st		PAID ON 12/10	\$0.00	12/10/15
		2nd	2nd	DUE	\$1,650.09	04/11/16
128-440-19-00 (SecuredDetails.aspx?parcelNumber=1284401900)	SHIREY FALLS LP	1st		PAID ON 12/10	\$0.00	12/10/15
		2nd	2nd	DUE	\$1,295.07	04/11/16
128-440-20-00 (SecuredDetails.aspx?parcelNumber=1284402000)	SHIREY FALLS LP	1st		PAID ON 12/10	\$0.00	12/10/15
		2nd	2nd	DUE	\$1,791.92	04/11/16
128-440-21-00 (SecuredDetails.aspx?parcelNumber=1284402100)	SHIREY FALLS LP	1st		PAID ON 12/10	\$0.00	12/10/15
		2nd	2nd	DUE	\$2,514.48	04/11/16
129-010-62-00 (SecuredDetails.aspx?parcelNumber=1290106200)	LILAC CREEK ESTATES L P	1st		PAID ON 12/10	\$0.00	12/10/15






		2nd	2nd	DUE	\$9,440.45	04/11/16
129-010-68-00 (SecuredDetails.aspx?parcelNumber=1290106800)	GOPHER CANYON L P	1st		PAID ON 12/10	\$0.00	12/10/15
		2nd	2nd	DUE	\$4,564.60	04/11/16
129-010-69-00 (SecuredDetails.aspx?parcelNumber=1290106900)	GOPHER CANYON L P	1st		PAID ON 12/10	\$0.00	12/10/15
		2nd	2nd	DUE	\$2,160.80	04/11/16
129-010-70-00 (SecuredDetails.aspx?parcelNumber=1290107000)	GOPHER CANYON L P	1st		PAID ON 12/10	\$0.00	12/10/15
		2nd	2nd	DUE	\$714.81	04/11/16
129-010-71-00 (SecuredDetails.aspx?parcelNumber=1290107100)	GOPHER CANYON L P	1st		PAID ON 12/10	\$0.00	12/10/15
		2nd	2nd	DUE	\$767.80	04/11/16
129-010-72-00 (SecuredDetails.aspx?parcelNumber=1290107200)	GOPHER CANYON L P	1st		PAID ON 12/10	\$0.00	12/10/15
		2nd	2nd	DUE	\$3,253.59	04/11/16
129-010-73-00 (SecuredDetails.aspx?parcelNumber=1290107300)	LILAC CREEK ESTATES L P	1st		PAID ON 12/10	\$0.00	12/10/15
		2nd	2nd	DUE	\$368.97	04/11/16
129-010-74-00 (SecuredDetails.aspx?parcelNumber=1290107400)	LILAC CREEK ESTATES L P	1st		PAID ON 12/10	\$0.00	12/10/15
		2nd	2nd	DUE	\$368.97	04/11/16
129-010-75-00 (SecuredDetails.aspx?parcelNumber=1290107500)	LILAC CREEK ESTATES L P	1st		PAID ON 12/10	\$0.00	12/10/15
		2nd	2nd	DUE	\$368.97	04/11/16
129-010-76-00 (SecuredDetails.aspx?parcelNumber=1290107600)	LILAC CREEK ESTATES L P	1st		PAID ON 12/10	\$0.00	12/10/15
		2nd	2nd	DUE	\$368.97	04/11/16
129-011-16-00 (SecuredDetails.aspx?parcelNumber=1290111600)	GOPHER CANYON L P	1st		PAID ON 12/10	\$0.00	12/10/15
		2nd	2nd	DUE	\$1,085.39	04/11/16
160-690-09-00 (SecuredDetails.aspx?parcelNumber=1606900900)	ST CLOUD RECOVERY ACQUISITION L L C	1st		PAID ON 12/10	\$0.00	12/10/15
		2nd		PAID ON 12/10	\$0.00	04/11/16
160-690-11-01 (SecuredDetails.aspx?parcelNumber=1606901101)	ST CLOUD RECOVERY ACQUISITION L L C	1st		PAID ON 12/10	\$0.00	12/10/15
		2nd		PAID ON 12/10	\$0.00	04/11/16
160-690-11-02 (SecuredDetails.aspx?parcelNumber=1606901102)	ST CLOUD RECOVERY ACQUISITION L L C	1st		PAID ON 12/10	\$0.00	12/10/15
		2nd		PAID ON 12/10	\$0.00	04/11/16
160-690-11-03 (SecuredDetails.aspx?parcelNumber=1606901103)	ST CLOUD RECOVERY ACQUISITION L L	1st		PAID ON 12/10	\$0.00	12/10/15

	C	2nd	PAID ON 12/10	\$0.00 04/11/16
160-690-14-00 (SecuredDetails.aspx?parcelNumber=1606901400)	ST CLOUD RECOVERY	1st	PAID ON 12/10	\$0.00 12/10/15
	ACQUISITION L L C	2nd	PAID ON 12/10	\$0.00 04/11/16
160-691-06-01 (SecuredDetails.aspx?parcelNumber=1606910601)	ST CLOUD RECOVERY	1st	PAID ON 12/10	\$0.00 12/10/15
	ACQUISITION L L C	2nd	PAID ON 12/10	\$0.00 04/11/16
160-691-06-02 (SecuredDetails.aspx?parcelNumber=1606910602)	ST CLOUD RECOVERY	1st	PAID ON 12/10	\$0.00 12/10/15
	ACQUISITION L L C	2nd	PAID ON 12/10	\$0.00 04/11/16
160-691-06-03 (SecuredDetails.aspx?parcelNumber=1606910603)	ST CLOUD RECOVERY	1st	PAID ON 12/10	\$0.00 12/10/15
	ACQUISITION L L C	2nd	PAID ON 12/10	\$0.00 04/11/16
160-691-06-04 (SecuredDetails.aspx?parcelNumber=1606910604)	ST CLOUD RECOVERY	1st	PAID ON 12/10	\$0.00 12/10/15
	ACQUISITION L L C	2nd	PAID ON 12/10	\$0.00 04/11/16
160-691-07-00 (SecuredDetails.aspx?parcelNumber=1606910700)	ST CLOUD RECOVERY	1st	PAID ON 12/10	\$0.00 12/10/15
	ACQUISITION L L C	2nd	PAID ON 12/10	\$0.00 04/11/16
160-691-08-00 (SecuredDetails.aspx?parcelNumber=1606910800)	ST CLOUD RECOVERY	1st	PAID ON 12/10	\$0.00 12/10/15
	ACQUISITION L L C	2nd	PAID ON 12/10	\$0.00 04/11/16
160-691-09-00 (SecuredDetails.aspx?parcelNumber=1606910900)	ST CLOUD RECOVERY	1st	PAID ON 12/10	\$0.00 12/10/15
	ACQUISITION L L C	2nd	PAID ON 12/10	\$0.00 04/11/16
160-692-12-00 (SecuredDetails.aspx?parcelNumber=1606921200)	ST CLOUD RECOVERY	1st	PAID ON 12/10	\$0.00 12/10/15
	ACQUISITION L L C	2nd	PAID ON 12/10	\$0.00 04/11/16
160-692-15-00 (SecuredDetails.aspx?parcelNumber=1606921500)	ST CLOUD RECOVERY	1st	PAID ON 12/10	\$0.00 12/10/15
	ACQUISITION L L C	2nd	PAID ON 12/10	\$0.00 04/11/16
160-692-18-00 (SecuredDetails.aspx?parcelNumber=1606921800)	ST CLOUD RECOVERY	1st	PAID ON 12/10	\$0.00 12/10/15
	ACQUISITION L L C	2nd	PAID ON 12/10	\$0.00 04/11/16
160-692-19-00 (SecuredDetails.aspx?parcelNumber=1606921900)	ST CLOUD RECOVERY	1st	PAID ON 12/10	\$0.00 12/10/15
	ACQUISITION L L C	2nd	PAID ON 12/10	\$0.00 04/11/16
160-692-20-01 (SecuredDetails.aspx?parcelNumber=1606922001)	ST CLOUD RECOVERY ACQUISITION L L	1st	PAID ON 12/10	\$0.00 12/10/15


	C	2nd	PAID ON 12/10	\$0.00 04/11/16
160-692-20-02 (SecuredDetails.aspx?parcelNumber=1606922002)	ST CLOUD RECOVERY	1st	PAID ON 12/10	\$0.00 12/10/15
	ACQUISITION L L C	2nd	PAID ON 12/10	\$0.00 04/11/16
160-692-20-03 (SecuredDetails.aspx?parcelNumber=1606922003)	ST CLOUD RECOVERY	1st	PAID ON 12/10	\$0.00 12/10/15
	ACQUISITION L L C	2nd	PAID ON 12/10	\$0.00 04/11/16
160-692-20-04 (SecuredDetails.aspx?parcelNumber=1606922004)	ST CLOUD RECOVERY	1st	PAID ON 12/10	\$0.00 12/10/15
	ACQUISITION L L C	2nd	PAID ON 12/10	\$0.00 04/11/16
160-692-20-05 (SecuredDetails.aspx?parcelNumber=1606922005)	ST CLOUD RECOVERY	1st	PAID ON 12/10	\$0.00 12/10/15
	ACQUISITION L L C	2nd	PAID ON 12/10	\$0.00 04/11/16
160-692-20-06 (SecuredDetails.aspx?parcelNumber=1606922006)	ST CLOUD RECOVERY	1st	PAID ON 12/10	\$0.00 12/10/15
	ACQUISITION L L C	2nd	PAID ON 12/10	\$0.00 04/11/16
160-692-20-07 (SecuredDetails.aspx?parcelNumber=1606922007)	ST CLOUD RECOVERY	1st	PAID ON 12/10	\$0.00 12/10/15
	ACQUISITION L L C	2nd	PAID ON 12/10	\$0.00 04/11/16
160-692-20-08 (SecuredDetails.aspx?parcelNumber=1606922008)	ST CLOUD RECOVERY	1st	PAID ON 12/10	\$0.00 12/10/15
	ACQUISITION L L C	2nd	PAID ON 12/10	\$0.00 04/11/16
160-692-20-09 (SecuredDetails.aspx?parcelNumber=1606922009)	ST CLOUD RECOVERY	1st	PAID ON 12/10	\$0.00 12/10/15
	ACQUISITION L L C	2nd	PAID ON 12/10	\$0.00 04/11/16
160-692-20-10 (SecuredDetails.aspx?parcelNumber=1606922010)	ST CLOUD RECOVERY	1st	PAID ON 12/10	\$0.00 12/10/15
	ACQUISITION L L C	2nd	PAID ON 12/10	\$0.00 04/11/16
160-692-21-00 (SecuredDetails.aspx?parcelNumber=1606922100)	ST CLOUD RECOVERY	1st	PAID ON 12/10	\$0.00 12/10/15
	ACQUISITION L L C	2nd	PAID ON 12/10	\$0.00 04/11/16
160-692-22-00 (SecuredDetails.aspx?parcelNumber=1606922200)	ST CLOUD RECOVERY	1st	PAID ON 12/10	\$0.00 12/10/15
	ACQUISITION L L C	2nd	PAID ON 12/10	\$0.00 04/11/16
160-692-23-00 (SecuredDetails.aspx?parcelNumber=1606922300)	ST CLOUD RECOVERY	1st	PAID ON 12/10	\$0.00 12/10/15
	ACQUISITION L L C	2nd	PAID ON 12/10	\$0.00 04/11/16
259-231-28-00 (SecuredDetails.aspx?parcelNumber=2592312800)	OLIVENHAIN TOWN CENTER 5.6 L P	1st	PAID ON 12/10	\$0.00 12/10/15

		2nd	<div> 2nd</div>	DUE	\$5,453.54	04/11/16
259-231-30-00 (SecuredDetails.aspx?parcelNumber=2592313000)	OLIVENHAIN TOWN CENTER 5.6 L P	1st		PAID ON 12/10	\$0.00	12/10/15
		2nd	<div> 2nd</div>	DUE	\$4,347.74	04/11/16
259-231-32-00 (SecuredDetails.aspx?parcelNumber=2592313200)	OLIVENHAIN TOWN CENTER 5.6 L P	1st		PAID ON 12/10	\$0.00	12/10/15
		2nd	<div> 2nd</div>	DUE	\$2,053.52	04/11/16
267-240-14-00 (SecuredDetails.aspx?parcelNumber=2672401400)	SEGAL ALEXANDER&DINA B	1st		PAID ON 12/05	\$0.00	12/10/15
		2nd	<div> 2nd</div>	DUE	\$8,440.62	04/11/16
480-021-76-00 (SecuredDetails.aspx?parcelNumber=4800217600)	KWAN ACACIA L L C	1st		PAID ON 11/19	\$0.00	12/10/15
		2nd	<div> 2nd</div>	DUE	\$8,228.64	04/11/16

Supplemental

Parcel Number	Owner	Inst	Action	Status	Amount Due	Late After
849-094-12-14 (SupplementalDetails.aspx?parcelNumber=8490941214)	SHIREY FALLS LP	1st		PAID ON 12/10	\$0.00	12/10/15
		2nd	<div> 2nd</div>	DUE	\$1,593.60	04/11/16
849-094-12-24 (SupplementalDetails.aspx?parcelNumber=8490941224)	SHIREY FALLS LP	1st		PAID ON 12/10	\$0.00	12/10/15
		2nd	<div> 2nd</div>	DUE	\$942.92	04/11/16
849-094-12-34 (SupplementalDetails.aspx?parcelNumber=8490941234)	SHIREY FALLS LP	1st		PAID ON 12/10	\$0.00	12/10/15
		2nd	<div> 2nd</div>	DUE	\$696.66	04/11/16
849-094-12-44 (SupplementalDetails.aspx?parcelNumber=8490941244)	SHIREY FALLS LP	1st		PAID ON 12/10	\$0.00	12/10/15
		2nd	<div> 2nd</div>	DUE	\$1,029.12	04/11/16
849-094-12-54 (SupplementalDetails.aspx?parcelNumber=8490941254)	SHIREY FALLS LP	1st		PAID ON 12/10	\$0.00	12/10/15
		2nd	<div> 2nd</div>	DUE	\$1,554.57	04/11/16

Unsecured

Bill Number	Owner	Status	Action	Amount Due	Payment Type
2011-001181 (UnsecuredDetails.aspx?billNumber=2011001181)	SILICON BORDER DEVELOPMENT LLC	OPEN	 Add	\$103.45	Balance
2015-000338 (UnsecuredDetails.aspx?billNumber=2015000338)	ZOSA RANCH INCAKA LILAC HILLS RANCH	PAID		\$0.00	Balance
2015-030097 (UnsecuredDetails.aspx?billNumber=2015030097)	RANCH CAPITAL LLC	PAID		\$0.00	Balance
2015-051729 (UnsecuredDetails.aspx?billNumber=2015051729)	SHEPPARD MULLIN RICHTER&HAMPTON LLP	PAID		\$0.00	Balance

2015-061535 (UnsecuredDetails.aspx?billNumber=2015061535)	ZOSA RANCH INCAKA LILAC HILLS RANCH	PAID		\$0.00	Balance
2015-065964 (UnsecuredDetails.aspx?billNumber=2015065964)	SAMUEL SCOTT FINANCIAL GROUP LS OF CIT FINANCE LL	OPEN	<div> Add</div>	\$148.78	Balance

To add additional payments to your shopping cart, please click "New Search" below.

The Treasurer-Tax Collector accepts Visa, MasterCard and Discover credit cards, and all American Express cards. A convenience fee of 2.19% is required for processing these cards. All other debit cards, dual-use cards, gift cards and prepaid cards are NOT accepted.

Convenience Fee:

- Electronic Check: \$.00 per transaction
- Credit Card: 2.19% of the total payment amount

New Search

County of San Diego
Department of Planning & Development Services
5510 Overland Ave. Suite 310
San Diego, Ca. 92123

Att: Mark Wardlaw

PROJRCT Name: Property Specific Requests General Plan Amendment & Rezone

PROJECT NUMBER(S): PDS2012-3800-12-005; PDS2014-REZ-14-006

ENV.REVIEW NUMBER; PDS2012-ER-12-00-003

I received your letter on this project and would like to make my commence short and to the point. I object to every environmental issue change presented. I love the open spaces with nature the way God make it, not cluttered with housing tracts uprooting trees and disfiguring the landscape.

Spoiling the sweet quietness with crushing of rock and polluting the air with emissions from cars. We have a water shortage, so we don't need to have more people using it.
Allowing animals to have the freedom to live in their natural country side uninterrupted.

To the proposed Project changes to Land Use designations to increase residential densities of the PSR areas. My vote is to "NO" To each and every area mentioned from Bonsall to Valley Center.

Carol Helsel
2019 Sycamore Dr.
San Marcos, Ca. 92069

Comment [C1]:

Comment [C2R1]:

February 12, 2016

Kimberly Jones
5510 Overland Avenue, Suite 410
Mail Stop O-332
San Diego, CA 92123

RE: PROJECT NUMBER(S): PDS2012-3800-12-005; PDS2014-REZ-14-006
ENV. REVIEW NUMBER: PDS2014-ER-12-00-003

Dear Kimberly:

First I want to thank you for the invitation and opportunity to express some thoughts and concerns I have about the impact that rezoning will have on Campo and the surrounding community.

1. Community Resources.
2. Water
3. Fire concerns
4. Changes in wild habitat
5. Road in and out will be impacted
6. Some of our fixed income resident's taxes that will increase as a financial hardship

Our community resources that will have the most impact on the schools in the area of class sizes, increase as well as teachers and busses, materials and supplies that are in the school budget. Fire department and medical are a concern also.

Campo is arid high desert with ongoing water concerns. How will the need for water for our Ranching and farming residents be protected? The use of ground water must be a necessity. That means captured water only with reservoirs or tanks that will need to be the developer's responsibility and expense.

Those of us that have lived in the Campo area for some time are aware that there is a 7-9 months' time period that we have high fire risk and live in such a way that we are always on watch for fire hazards. Will there be anyone coming into this area be able to experience that lifestyle or be comfortable with that ongoing reality. The entire community is on fire watch. One careless act puts the entire community at risk.

The encroachment on wild habitat is very real. When building human habitat, not enough thought is given to how much we lose as a result of not taking the time to look at what is irreplaceable. This diminishes our lifestyle as well. The quail, bobcats, skunks and possums live in Campo as well.

[Recipient Name]

February 12, 2016

Page 2

Road repair and expansion without putting strain on an already limited roadway accessibility in some areas.

My land parcels are used for family camping, recreation and are undeveloped, but I enjoy all of the parcels adjacent to mine. Developing property may be reassessed and any increase in tax would prove a hardship on some of the Campo residents.

Please mail any future correspondence to:

Aneva Ann Isaacs
2235 Serena Hill Drive
Ramona, CA 92065

You may also reach me by phone at 760-484-7352 or email janadee@live.com

Sincerely,

A handwritten signature in cursive script that reads "Aneva Ann Isaacs". The signature is written in dark ink and is positioned below the word "Sincerely,".

Aneva Isaacs

From: rw-peterson@cox.net
To: [Eichar, Peter](#)
Subject: Property Specific Requests General Plan Amendment and Rezone PDS2012-3800-12-005; PDS2014-REZ-14-006
Date: Thursday, February 04, 2016 3:03:57 PM

Dear Mr. Eichar,

The proposed project is a direct violation of the rural and agricultural character of Twin Oaks Valley and the area.

It is fraught with traffic, water, fire, environmental, noise, over population, community charactor, zoning and other concerns. It is a violation of the General Plan.

What can possibly be done to mitigate any of these concerns ?

Why is this bad development project even being considered, again ?

Thank you,

Robert Peterson
906 Deer Spring Road
San Marcos, CA 92069

760-443-0575

February 2, 2016

COMMENTS on Notice of Preparation, 3Dec2015, revised 10Dec2015, re. Assessor Parcel Number 1283105000, Townsend Lyn R & Diana R Trust, 9430 W Lilac Rd, Escondido, CA 92026

Thank you for the opportunity to provide comments to the recently published NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT dated December 3, 2015 (revised December 10, 2015). Per requirements, our comments have been delivered by February 4, 2016, and have been sent via email to Peter.Eichar@sdcounty.ca.gov.

In the comments that follow, I note the importance of including the following pieces within the proposed SEIR:

- Thorough analysis and evaluation of cumulative effects of sweeping County-wide general plan land use and zoning redesignations,
- Complete inclusion and analysis of potential alternatives, particularly including infill development, and
- Careful examination of impacts to the recreational bicycling communities of North County San Diego.

The proposed Project is a Property Specific Requests GPA to the San Diego County General Plan. The proposed Project would result in revisions to the existing General Plan Land Use and zoning designations on private properties including their surrounding study areas, totaling approximately 13,000 acres within 1,149 parcels throughout the unincorporated County.

The Project diverges sharply from the county's expensive new General Plan, a blueprint for growth with the intention to guide decision-making. The new General Plan's LU-1.2 policy to prohibit leapfrog (sprawl) development or the cumulative impact of "revisions to the existing General Plan Land Use and zoning designations" which ultimately contribute to leapfrog and sprawling development (re General Plan LU-1.5 policy).

Based on the County's preliminary analysis of the proposed Project, the following environmental issues are to be examined in the SEIR: Aesthetics, Land Use and Planning, Agriculture and Forestry Resources, Mineral Resources, Air Quality and Greenhouse Gas Emissions, Noise, Biological Resources, Population and Housing, Cultural and Paleontological Resources, Public Services, Geology and Soils, Recreation, Global Climate Change, Transportation and Traffic, Hazards and Hazardous Materials, Utilities and Service Systems, and Hydrology and Water Quality. Other than brief mention that the SEIR will tier to the Programmatic EIR for the General Plan Update, there is no specific mention of CUMULATIVE IMPACTS of the aforementioned environmental issues. Unfortunately, the existing cumulative impacts analysis in the General Plan Update seem to be short on logic and fail to adequately assess the significance of collective impacts, particularly from a County wide redesignation of land uses from low density to high density, or low density to commercial or industrial.

Cumulative impacts are an essential inclusion to the SEIR and must be analyzed carefully and thoroughly. The cumulative impacts are where the erosion of community character and environmental safety and health can be most accurately captured, especially when such large scale, County-wide growth plan changes are to be made. Even if local impacts to habitat and infrastructure are considered less than significant under each individual development proposal, the cumulative impacts of sweeping zoning redesignation are certainly not. Each proposed or future revision or change in zoning designation represents an incremental change and cumulative impact on conditions in comparison to conditions at the time of adoption of the General Plan Update (2011).

Of particular concern is that cumulative environmental and infrastructure impacts have already reached or will reach a tipping point in many of the proposed zoning redesignation sites. For example, in the nearby proposed Lilac Hills Ranch development (Valley Center CPA), the roads, water, sewers, and house fire/wildfire response times are not sufficient for an estimated 5,000 additional people to live there, not to mention impacts, if the development proceeds, on the existing population in the surrounding and neighboring land and parcels. Conditions get cumulatively worse as developers are given permission to acquire rural and semi-rural land, build a large development on them, and leave the County to scramble to relieve the issues brought about by increasing densities in a previously rural or semi-rural

community. In other words, how can cumulative impacts that are at a tipping point of “significance” or imminently near a tipping point be mitigated or minimized with leapfrog, sprawling development in rural and semi-rural areas with little to no infrastructure?

Another essential piece of any EIR is the presentation of alternatives to the proposed project, which must be considered in order to ensure that significant individual and cumulative impacts are avoided, minimized, or mitigated. It is my expectation that the presentation of alternatives include a thorough analysis of the possibility of utilizing infill growth, instead of sprawl. Infilling development is environmentally sound in towns and cities with existing infrastructure, reducing the exorbitant costs to maintain a huge, spread-out network of roads, pipes, wires, and fire response. Infilling development will also have significantly fewer impacts in relation to the SANDAG 2050 transportation plan where the County is to meet state goals to reduce greenhouse gases. This will be difficult to impossible if developers are allowed to locate populations of people far away from available jobs, force them to commute, and offer no public transportation.

Finally, an essential consideration in the SEIR will be the individual and cumulative impacts to recreational activities, particularly bicycling in North County San Diego. The North County bicycling community consisting of many formal and informal groups and individuals has developed in this area as a result of excellent road cycling opportunities, climate, and aesthetic beauty. It is currently a world class hub for training of professional, amateur and recreational cyclists, e.g. the Race Across the West, and the Race Across America which both begin and traverse their way through the County. The economic and public health safety impacts of sprawling development throughout North County to an existing strong cycling community must be effectively analyzed. For example, there is an increasing concern of existing rural road standards with the new 3-foot clearance rule between vehicles and bicycles (California Vehicle Code § 21760). Changes to rural and semi-rural land use designations that increase traffic numbers will further heighten this concern to the detriment of health, safety, efficient traffic flow and potential loss of life by motorists and cyclists.

Please feel free to contact me for additional clarification and testimony.

Sincerely,

/s/ Lyn Townsend

Forest Ecologist (Ret), USDA Natural Resources Conservation Service

Cyclist (active): North County Cycling Club, North Coast Velo, Ranchos, Bonsal Wednesday Group

9430 W Lilac Rd, Escondido, CA

360-903-8756

BONSALL COMMUNITY SPONSOR GROUP

Dedicated to enhancing and preserving a rural lifestyle



BY ELECTRONIC MAIL

January 30, 2016

Mark Wardlaw, Director
County of San Diego Planning and Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

RE: Notice of Preparation of Supplemental EIR for the County's Property Specific Requests General Plan Amendment and Rezone

Dear Mr. Wardlaw:

The Bonsall Sponsor Group reviewed the proposed Property Specific Requests submitted to our group and the following are our comments.

1. The County has not completed all of the Planning and Sponsor Group Community Plans throughout the county. That being said the County has an obligation to complete all community plans for the County General Plan (GP) to be whole. Why having a second round of Property Specific Requests (PSR) that are not only out of compliance with the GP but do not meet the growth expatiations of the communities.
2. As the San Diego County General Plan and the Bonsall Community Plan was approved by the Board of Supervisors in 2011 **we have not asked for and do not want to CHANGE our approved community plan how did we get placed on this list?**
3. As all property in Bonsall was reviewed at that time for density and the community of Bonsall residents were willing to see our population change from 11,000 to 17,000 with buffers and a green belts along the boundaries of the community things have already changed and it has been all of five (5) years
4. We have seen a project of 300 acres of prime agriculture land ask to be annexed into the City of Vista on the south west boundary of our community and now with these PSR presented we will now have our eastern boundary impacted on both sides of Highway 15. Again we will see agricultural and our buffers eliminated and thus becoming just another linking community without any identity.
5. The Bonsall Community Plan was established to create density and zoning which staff is moving forward to change 1,181 acres in Bonsall to higher density and the change the tapestry and identity of Bonsall. The PSR near Aqueduct Road have steep slopes and high fire risk, violating Policies LU-6.11, LU-7.1, LU-9.2, S-1.1 and S-7.1.the proposed PSR in Bonsall cannot be reconciled with any of the applicable Update Policies. This area would also require a new road system though out and the loss of more agriculture if approved.



<http://www.bcsbg.org>



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One of the three Goals of the GP was to promote agriculture however we are losing it by the hundreds of acres both in the GP and through these “late to the GP requests”. Where were they during the General Plan Update and why were they not processed during that time?

6. Who is paying for this density update? Is this the funds that the County proposes to spend of up to \$1.3 million in taxpayer funds to process these requests in a General Plan amendment. This is a private benefit at cost to the public with increased infrastructure and services costs required to serve additional development.
7. When reviewing the GP we noticed LU-1.1 Assigning Land Use Designations. Assign land use designations on the Land Use Map in accordance with the Community Development Model and boundaries established by the Regional Categories Map.
8. GP -LU-1.3 Development Patterns. Designate land use designations in patterns to create or enhance communities and preserve surrounding rural lands. The Bonsall Community Plan 1.2 Community Growth Policy Goal LU-2.1 Development that centers inside the core Village in Bonsall and discourages spot development outside that area. The PSR suggested for Bonsall are not within the community growth policy nor do they support our Residential Land Use while maintaining and enhancing the existing rural atmosphere of the community.
9. GP -LU-2-4 Relationship of Land Uses to Community Character. ENSURE that the land uses and densities within any Regional Category or Land Use Designation depicted on the Land Use Map reflect the unique issues, character, and development objectives for a Community Plan area. How do you rationalize this statement within the approved GP and the spot development being suggested in the PSR?
10. GP - LU-6.2 Reducing Development Pressures. Assign lowest-density or lowest-intensity land use designations to areas with sensitive natural resources. Again the proposed PSR do not conform to the GP nor the Bonsall Community Plan.
11. The NOP does not state why the proposed additional dwelling units are “necessary” or “desirable” to add to the already over 72,683 new units provided for by the newly adopted General Plan or how the General Plan with its focus on planned growth in or adjacent to existing or planned higher density and infrastructure (and thus reduced sprawl and greenhouse gas emissions).
12. The NOP does not, but should make clear what impact if any approval of the individual parcels (or the adjacent “study area” parcels) would have on the pending Accretive Lilac Hills Ranch Project, whether that Project is approved, or denied.



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13. The NOP does not but should make clear what impact if any approval of the individual parcels (or the adjacent “study area” parcels) would have on the pending NewLand Sierra Tentative Map Project, whether that Project is approved or denied.
14. Will there be a Project Alternative that proposes just the Property Specific Request parcels (without the “Study areas”) but at reduced densities that those requested.
15. The NOP does not provide the Public with sufficient information to intelligently comment as required by CEQA.

In summation the Bonsall Community Sponsor Group does not see how staff can prepare the NOP for Property Specific Requests General Plan Amendment and Rezone without having completed the Community plans for all 26 communities in the County of San Diego before they recommend changes to the 1,149 parcels in the communities. The cost to the public is not rational with the \$2.3 million dollar benefit going to private property owners that did not participate in the approved 2011 General Plan this is not a public benefit and the \$2.3 million should not be used for this purpose.

Another concern of the Bonsall Sponsor Group had was with the County of San Diego not currently meeting the State of California’s Green House Gas Emission Standards it appears that the increase in density throughout the unincorporated County that the NOP proposed revision is not in compliance with the State as well as the Community Plans that were approved and included in the 2011 General Plan.

Sincerely,

Margarette Morgan

Margarette Morgan, Chair
Bonsall Sponsor Group



<http://www.bcsbg.org>





January 7, 2016

VIA ELECTRONIC MAIL

Peter Eichar
Dept. of Planning and Development Services
5510 Overland Ave
San Diego CA 92123
<Peter.Eichar@sdcounty.ca.gov>

**RE: Notice of Preparation for Property Specific Requests General Plan
Amendment and Rezone**

Dear Mr. Eichar:

Endangered Habitats League (EHL) is in receipt of the NOP for this project and appreciates the opportunity to comment. For your reference, EHL served on the Interest Group of stakeholders for the General Plan Update adopted in 2011. We continue to have a keen interest in the values and benefits of this historic update, and in its integrity over time.

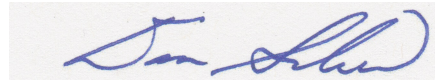
As reflected in previous testimony to the Board of Supervisors, we have profound concerns over the Property Specific Requests (PSRs). Absent a planning-based rationale, these requests revisit in an *ad hoc* manner the uniform and comprehensive land use designations arrived at during the orderly, deliberate, and inclusive GPU process. If adopted, they would constitute special exemptions from the sound planning rules in force for thousands of similar properties. They would deeply undermine the rural character of San Diego, the savings in infrastructure and service costs achieved by the 2011 Update, and provide little other than GHG-intensive estate lots rather than even moderately affordable housing.

The *current* designations – now being proposed for change – also reflected the best professional judgment of, and were recommended, by your own Department. In EHL's view, the scope of these requests – affecting well in excess of 10,000 acres – spiraled out of control compared to the more limited initial intent of the process. For your reference and use during SEIR preparation, I enclose EHL's testimony to the Board in 2012 which includes analysis of these proposals.

We look forward to a rigorous analysis of General Plan consistency and environmental effects in the SEIR. Effects of these *ad hoc* amendments on regional planning, such as the SANDAG Regional Transportation Plan/Sustainable Communities Strategy, should be assessed as well as implications for the County's Climate Action Plan.

EHL looks forward to constructive participation in any public outreach process that the Department may lead between now and DEIR release. We believe such a process, particularly if started early, would be of great value to the County as it develops the SEIR and alternatives for this highly controversial project. We therefore urge robust and meaningful stakeholder input.

Yours truly, and with best wishes for
the New Year,

A handwritten signature in blue ink, appearing to read "Dan Silver", is displayed within a light gray rectangular box.

Dan Silver
Executive Director

cc: LUEG
DPDS
Board Offices
Interested parties

BY ELECTRONIC MAIL AND FACSIMILE

June 17, 2012

The Hon. Ron Roberts, Chair
Board of Supervisors
County of San Diego
1600 Pacific Highway
San Diego, CA 92101

RE: Workplan Options for Property Specific Requests (June 20, 2012, Item 3)

Dear Chairman Roberts and Members of the Board:

These comments are submitted on behalf of the Endangered Habitats League (EHL), a non-profit corporation that owns land in San Diego County, the members of Endangered Habitats League, many of whom own land in San Diego County, and Jacqueline Arsivaud-Benjamin, a resident and homeowner in San Diego County.¹

As you know, the Endangered Habitats League (EHL) has worked alongside this Board and your planning staff for over a dozen years to help produce a sustainable framework for growth that meets the environmental and economic challenges of the 21st century. The Update you adopted last August represented huge progress compared to the plan it replaced—reducing pressure on natural resources, saving taxpayer money on infrastructure and services, and helping to preserve the San Diego backcountry’s rural and agricultural heritage. The Update also provided for all projected growth with room to spare and, in the more than 12 years of public outreach, provided hundreds of opportunities for affected landowners to participate in its development. One result was the eventual incorporation into the Update of dozens of “referrals,” whose conformance with the Update’s objectives as reflected in the Guiding Principles was questionable.

Now, *post-Update*, the Board is poised to undermine the plan’s fundamentally good outcomes by processing *at public expense* an additional set of landowner-generated amendments, or “property specific requests” (PSRs), affecting thousands of acres—changes that are irreconcilable with the Update’s Guiding Principles and the General Plan policies implementing them and which have no rational relationship to any legitimate public interest. Indeed, as we explain below, a great many of the proposed requests bear no substantial and reasonable relationship to the public welfare and are therefore invalid as beyond the exercise of the police power. (See *Arnel Development Co. v. City of Costa Mesa* (1981) 126 Cal.App.3d 330, 336-337.)

¹ As such, these entities have paid property taxes and/or property-related surcharges and special district taxes within the last year.

It is the purpose of this letter to alert you to the high legal risks inherent in this venture if it goes forward. Legal defense is another cost that would be borne by the taxpayer—*on top of* the effective transfer of public dollars to benefit a select group of landowners who wish to increase the financial value of their properties, and *in addition to* the higher long term costs of providing infrastructure, fire protection, and other services to remote development.

The legal uncertainty is on three levels. The first is the obvious matter of CEQA compliance, impact assessment, mitigation, and findings. Many of the PSRs and associated re-planning of Study Areas to avoid spot zones have not been analyzed in the completed CEQA process for the Update. Cumulatively, they could have a cascading effect on other elements of the Update, including the circulation element, mitigation and, depending on what additional PSRs move forward, the very architecture of the Update itself. Reliance on the existing EIR as the Project changes will become increasingly problematic.

The second level of risk is that of General Plan internal inconsistency, a risk inherent in a process of modifying proposals to achieve a semblance of conformity. But due to the new terminology now used to categorize the PSRs, this uncertainty is minimized and downplayed (as will be described below). PSRs are now segregated by their “complexity.” More “complex” PSRs, as Staff notes, require “greater justification” to demonstrate consistency with adopted General Plan principles and policies. (Staff Report at p. 4.) In other words, the Staff Report itself acknowledges that many of the PSRs proposed for processing will require complex, tenuous and likely unsupportable rationales to justify their existence as the proverbial square pegs are thrust into round holes. The term “complexity,” as used by Staff, therefore really means “likelihood that a General Plan inconsistency will result that increases litigation exposure.” While the term “complex” might typically be understood as meaning a problem that simply requires a more lengthy analysis, prolixity will not paper over General Plan inconsistencies.

Adding to this level of risk is the precedent set by the County’s own actions on Referrals over time. As Staff noted in January of this year, “general plan decisions be made based on a deliberative process that is not arbitrary or capricious.” In building this Update, this Board and Staff rejected numerous proposed referrals because they were found inconsistent with the Update’s Guiding Principles. For example, when considering residential referrals in September of 2003, this Board rejected many for being inconsistent with surrounding densities, for being distant from infrastructure and services, for environmental and physical constraints such as habitat and agriculture, and for public safety rationales, including high fire and flood risk.² [See, e.g., Referrals 141, 151, 152, 153, 160, 162, 166-167, and 171.] Many of the requests deemed to create inconsistencies then are factually indistinguishable from the ones being proposed as being consistent here.

² <http://www.sdcounty.ca.gov/dplu/gpupdate/bos_sep03.html>, Oct. 1, 2003 Statement of Proceedings <http://www.sdcounty.ca.gov/bos/agenda/sop/index_2003.html>

Even Staff recognizes that this inconsistency in interpretation raises significant legal issues. In its January 2012 Report, Staff noted that “if the County chooses to implement the Guiding Principles differently for a single property, it would risk an inconsistency with how the Guiding Principles were applied to other similar properties.” The arbitrary about-face in the County’s approach towards these property specific requests is best illustrated by the random and contradictory application of the planning principles over time.

The third level of legal risk is that the mere processing of these amendments at public expense already runs afoul of settled common and statutory law prohibiting the wasteful and illegal expenditure of public funds. Code of Civil Procedure section 526a³ provides:

An action . . . preventing any illegal expenditure of, waste of, or injury to, the estate, funds, property of a county . . . may be maintained against any officer thereof . . . either by a citizen resident therein, or by a corporation, who is assessed for and is liable to pay, or, within one year before the commencement of the action, has paid, a tax therein.” (Code Civ. Proc. § 526a.) In *Ceres v. City of Modesto* (1969) 274 Cal. App. 2d 545, the court elaborated on the term “waste” as used in section 526a. The court explained that it:

“means more than an alleged mistake by public officials in matters involving the exercise of judgment or discretion; although the court must not close its eyes to wasteful, improvident and completely unnecessary spending, it should not attempt to enjoin every expenditure which does not meet with a taxpayer's approval; but a taxpayer complaining of government waste may state a cause of action under section 526a by alleging that funds are being expended for a project with no public benefit and no useful purpose.” (Id. at pp. 555-556.)

Even when “ ‘done in the exercise of a lawful power,’ ” public spending may qualify as waste if it is “ ‘completely unnecessary,’ ” or “ ‘useless,’ ” or “ ‘provides no public benefit.’ ” (*Sundance v. Municipal Court* (1986) 42 Cal.3d 1101, 1138-1139; *County of Ventura v. State Bar* (1995) 35 Cal.App.4th 1055, 1059.) It is unquestionably waste for government to budget or spend money administering an illegal ordinance. (See *Tobe v. City of Santa Ana* (1995) 9 Cal.4th 1069, 1086, citing *White v. Davis, supra*, 13 Cal.3d 757, 764.) While courts have made

³ “The primary purpose of this statute, originally enacted in 1909, is to ‘enable a large body of the citizenry to challenge governmental action which would otherwise go unchallenged in the courts because of the standing requirement.’ [Citation.] [¶] California courts have consistently construed section 526a liberally to achieve this remedial purpose.” (*Blair v. Pitchess* (1971) 5 Cal.3d 258, 267-268; accord, *Santa Barbara County Coalition Against Automobile Subsidies v. Santa Barbara County Assn. of Governments* (2008) 167 Cal.App.4th 1229, 1236; *Cates v. California Gambling Control Com.* (2007) 154 Cal.App.4th 1302, 1308.) Thus, “under section 526a ‘no showing of special damage to the particular taxpayer [is] necessary’ ” for the taxpayer to prevent injury to the public. (*White v. Davis* (1975) 13 Cal.3d 757, 764, quoting *Crowe v. Boyle* (1920) 184 Cal. 117, 152.)

clear that “although in general CCP section 526a should be interpreted liberally, it should not be used to invade, supersede, or even intrude upon the discretion invested in the legislative and executive branches of government⁴,” this principle necessarily implies that taxpayers should not countenance expenditures of public funds that are an *abuse* of that discretion.

Here, as we explain below, the County proposes to spend up to \$2.3 million in taxpayer funds to process these requests in a General Plan amendment. There is no public benefit or useful purpose to any of the proposed changes; to the contrary, there is only a *private* benefit at a *cost* to the public in increased infrastructure and services costs required to serve additional far-flung development. Moreover, a large percentage of the proposed changes would be manifestly inconsistent with the Guiding Principles and Policies that make up the architecture of the Land Use Element of the Update and therefore illegal. (Gov’t Code § 65300.5; *Federation of Hillside & Canyon Ass’ns v. City of Los Angeles* (2004) 126 Cal. App. 4th 1180.) Compounding this legal uncertainty, to our knowledge the action contemplated by your Board is *unprecedented*. We do not know of other local governmental agencies that have called upon landowners to come forward with requests to increase the development potential of their properties and then offered to pay *with government funds* for the processing of these requests for private gain.

Finally, adoption of a critical mass of these PSRs will concededly trigger revision of the Traffic Impact Fee (TIF). The thousands of additional units and associated vehicle trips on already congested rural roads that these PSRs will produce will likely result in the necessity for new road construction, improvement, and maintenance costs far in excess of the current TIF’s capacity (even assuming the additional units were to pay the current TIF). An underfunded TIF would result in lowered levels of service and necessitate a generally applicable increase in TIF fees. The increase in the TIF will thus affect everyone in the County who is subject to this fee, not just the landowners who benefit from the PSRs.

Individual Analyses of PSRs and Study Areas

Bonsall BO18, BO20, BO22, BO29, BO32 & BO33

Despite Community Planning Group opposition, nearly 300 acres in 5 parcels in the Bonsall Community are proposed for an increase in density from SR-10 to SR-4, a change that means that any subdivision would *no longer* be subject to the mandatory Conservation Subdivision Program (CSP) clustering provisions. An additional 634 acres would be similarly re-planned to avoid illegal spot zones. This means that about 58 additional units could be distributed in a dispersed estate lot subdivision pattern as opposed to being clustered if the densities were to remain at the Update’s SR-10 designation.

⁴ *Humane Society of the United States v. State Bd. of Equalization* (2007)152 Cal.App.4th 349, 358.

While there is some existing parcelization within the area to be re-planned, most of the land is in lots of 8 acres or more, meaning that the re-planning is likely to do significant damage over time. Staff analysis disregards the extensive habitat values that would be harmed, particularly in the south of the Study Area, contravening Policy LU-6.2 which seeks to assign lowest-density or lowest-intensity land use designations to areas with sensitive natural resources and agricultural resources. These areas also contain steep slopes and high fire risk, violating Policies LU-6.11, LU-7.1, LU-9.2, S-1.1 and S-7.1. In sum, the proposed PSRs in Bonsall cannot be reconciled with *any* of the applicable Update Policies.

Crest Dehesa CD14

The single PSR in this community, CD-14, will convert a portion of that parcel currently at SR-20 to SR-2 in an area that has been identified as high fire risk and valuable for habitat, violating Policy LU-6.2 and Policies LU-6.11, LU-9.2, S-1.1 and S-7.1. This radical densification would remove the mandatory CSP clustering for this area, compounding the damage.

Desert DS8

A major rationale for the Update was to promote economically efficient development to reduce infrastructure and service burdens. Guiding Principle 9 states that land use designations should “[m]inimize public costs of infrastructure and services and correlate their timing with new development.” Accordingly, new development should be “located near existing and planned infrastructure and services to require less extensive roads and infrastructure.”

In disregard of this bedrock principle, DS 8 would add nearly 400 dwelling units on prime agricultural land in a location with no jobs for these new residents, creating potentially expensive burdens on regional roads and public services. This change would violate Policy H-1.3 and LU-7.1.

Fallbrook FB2 & FB18

In an area surrounded on all sides by rural densities (SR-40) and public open space, this is a classic spot zone, even *after* Staff’s proposed compromise of SR-4 (from SR-2) on FB2 and SR-20 (from SR 10) on FB18. These groundwater dependent parcels are distant from infrastructure and have significant resources and development constraints. Policies LU-1.1, H-1.3, as well as Policies LU-6.11, LU-9.2, S-1.1 and S-7.1 as well as LU-8.1 are observed in the breach.

Staff provides no persuasive rationale why the proposal is still not a “major” change that violates the Guiding Principles. That utilities may be available on FB18 lands does not “cure” the spot zone of RL 20 surrounded by RL-40. Nor does parcelization in the “area” of FB2 alter the characterization of this classic spot zone of SR-4 in a “sea” of RL-20 and RL-40. Staff’s

characterization of this PSR as “low” in complexity lacks a factual foundation. The reality is that even this compromise is fundamentally inconsistent with the Update’s Guiding Principles and implementing Policies.

Fallbrook FB17

This PSR would create a long “finger” of SR-1 density in an area surrounded by SR-4 and SR-2, adding about 28 units, in an area with steep slopes and wetlands and with active agricultural operations. It cannot be reconciled with either the Community Development Model nor with Update policies mandating lower densities on resource-constrained areas.

Fallbrook FB19, FB25 & FB26

These PSRs would create “islands” of SR-10 in a rural area dominated by RL-20 in violation of LU-1.1. Staff claims the change would present “low” complexity based on speculation that the high percentage of land constrained by slopes will not ultimately significantly alter the unit yield. In actuality, Staff has it backwards. Update policies require that densities be *consistent* with constraints, including slope. Specifically, Policy LU-9.2 states that “areas that contain more steep slopes or other environmental constraints should receive lower density designations.” These PSRs therefore cannot be reconciled with Update policies.

Fallbrook FB21, FB22 & FB23

These PSRs would also create “islands” of SR-10 in a rural area dominated by RL-20 and public lands and apparently with no public roads in violation of LU-1.1. Staff again claims the change would present “low” complexity based on speculation that the high percentage of land constrained by slopes will not ultimately significantly alter the unit yield. In actuality, Staff has it backwards. Update policies require that densities be *consistent* with constraints, including slope. Specifically, Policy LU-9.2 states that “areas that contain more steep slopes or other environmental constraints should receive lower density designations.” These PSRs therefore also cannot be reconciled with Update policies, including LU-9.2.

Jamul/Dulzura JD16

In this late addition to the list of PSRs, a nearly 200-acre “finger” of RL-20 would be created in an ocean of RL-40 and public lands. Staff concludes that a designation of SR-10 would violate the Community Development Model while it does not specifically address this question for RL-20. As both of these designations are inconsistent with surrounding parcels of a similar size, both alternatives would violate Policy LU-1.1.

Julian JL5

This 32-acre parcel in a groundwater dependent area would change from SR-10 to SR-4 in an area dominated by SR-10 and RL-40. Staff states that any groundwater concerns will be addressed by the groundwater ordinance. This rationale ignores that the Update requires that groundwater be addressed in the *planning* for the land. LU-8.1 “requires” that “land use densities in groundwater dependent areas to be consistent with the long-term sustainability of groundwater supplies.” Staff’s approach would render this Policy entirely superfluous.

Lakeside 7A

This 50-acre PSR contemplates a change to an industrial designation in a floodplain—a change opposed by adjacent landowners whose *own* properties would be *involuntarily* affected. The affected Study Area contains coastal sage scrub and steep slopes. The proposed industrial area lacks a buffer against residents to the south and habitat lands to the north as required by LU-11.9. The change also violates Policy S-10.1, which limits incompatible uses (e.g. structures) in floodways. Contrary to the Staff Report, no exception in this Policy exists merely because there are efforts being made to change the 100-year flood designation.

Mountain Empire/Boulevard ME19

This 164-acre area is proposed for what is effectively an industrial area surrounded by RL-40 and RL-80 and public lands designations, and distant from other developed uses. Recognizing the planning inconsistencies, Staff recommends changing the County’s Zoning Ordinance to allow for “limited” food production in rural and agricultural areas. Such a change would upend the Community Development Model and violate Policy LU-10.4, which contemplates that industrial activities such as food processing be kept out of natural open space rural areas to limit traffic and environmental impacts. At the very least, this proposal needs further definition and clarity.

Mountain Empire/Campo/Lake Morena ME26

ME 26 is a 200-acre PSR would require the re-zoning of nearly 500 additional acres planned at RL-20 to avoid a spot zone, creating a long finger of SR-10 land surrounded by publically owned open space within a larger context of RL-80 rural lands. All of the land is in an area of very high fire risk in a remote location that is almost certainly groundwater dependent.

Semi-rural densities in this location offend the Community Development Model (LU-1.1) and Principle No. 9 aimed at locating development near infrastructure, as well as policies against density increases in groundwater dependent areas (LU-8.1) and in areas of high fire risk (LU-6.11). Staff’s reliance on the speculation that development in this area could meet required emergency vehicle travel times cannot replace the distinct policy that development should not be placed in such areas in the first place.

Mountain Empire/Campo/Lake Morena ME30A

ME 30A would convert the majority of a nearly 300-acre rural site just east of Campo into 4-acre estate lot subdivisions abutting a dense village—subdivisions that would not be subject to the mandatory clustering provisions of the Conservation Subdivision Program. This conversion of rural land completely upends the Update’s intent to maintain high densities in villages (LU-1.1) and expand them only where services are available to meet the expansion (LU-1.4, LU-6.11, LU-8.1)

North County Metro NC 18A

The majority of this nearly 100 acre area in an agricultural preserve would be converted into SR-1, even though Staff concedes that the required emergency response times for this density would likely not be met with current resources. This ignores Policy LU-7.1, requiring that densities preserve agricultural values, and Policy LU-1.4, which permits Village expansions only where “[p]ublic facilities and services can support the expansion without a reduction of services to other County residents.”

North County Metro/Hidden Meadows NC 3A

This 243-acre spot zone drags nearly another 757 acres into a massive 1000-acre doubling of density from RL-20 to SR-10. Doubling the density in this rugged, high-fire risk and habitat-rich area cannot be reconciled with Guiding Principles Nos. 4 & 5 and violates Policy LU-6.2 and Policies LU-6.11, LU-9.2, S-1.1 and S-7.1. Staff’s Reliance on the Conservation Subdivision to justify this change renders these Policies ineffective. The Conservation Subdivision comes into play only *after* appropriate densities have been assigned.

North County Metro/Twin Oaks NC22

NC22 is a 27-acre PSR in the San Marcos Highlands that drags another 131 acres into an up-plan to cure a spot zone. Vehemently opposed by the community, the sole rationale of this PSR is to accommodate a landowner’s wish to resuscitate an expired potential development and annexation into the City of San Marcos that never should happen. Habitat-rich and fire-prone lands on SR-10 lands that would have been clustered under the Conservation Subdivision Program would be obliterated under a carpet of one-acre lots that would not be subject to clustering. Staff acknowledges that the land “is at the center of an intersection between two important wildlife corridors for the area” that are critical for the development of the MSCP North. This PSR cannot be reconciled with Guiding Principles Nos 4 & 5 and violating Policy LU-6.2 and Policy LU-10.3, as well as Policies LU-6.11, LU-9.2, S-1.1 and S-7.1.

North County Metro/Twin Oaks NC 37

NC37 is another instance where 130 acres becomes collateral damage for a 26-acre spot zone, forcing the rezoning of 156 acres from SR-10 to SR-4 (removing all this property from the protection of the Conservation Subdivision Program's clustering provisions) to accommodate a single 26-acre landowner. Opposed by the community, the property has some steep slopes, habitat and agricultural value, and is in a very high fire hazard area. This completely unnecessary up-plan would violate Policies LU-6.11, LU-9.2, S-1.1 and S-7.1.

North County Metro/Twin Oaks NC 38, NC 41 & NC 48

NC38, NC41, and NC48 together total about 80 acres—3 PSRs that would generate about 40 additional units from an up-plan from SR-2 to SR-1. Opposed by the community, this suburban density designation would add these homes in a FEMA floodway on prime agricultural soils peppered with high habitat value oak and sycamore woodlands. Aside from violating Policies governing habitat and agricultural lands, this set of PSRs is in direct contravention of Policy S-1.10, which “limits new or expanded uses in floodways to agricultural, recreational, and other such low-intensity uses and those that do not result in any increase in flood levels during the occurrence of the base flood discharge” and which specifically *excludes* “habitable structures.” Staff provides no rational basis for putting suburban-style densities in such an area.

North County Metro/Twin Oaks NC42

Site of the former Merriam Mountains proposal, NC42 would turn the Community Plan on its head. It would also cause a massive re-planning of over 1500 acres of surrounding rural lands. The Community Development Model, Guiding Principle 2, and related Policies LU1.1, LU1.2 and LU1.4 would be violated. Policies that assign lower densities to habitat and agricultural resources would also be breached.

North Mountain NM5

NM15 would remove 5 acres of land from RL-80 rural use and from an existing agricultural preserve pursuant to Board Policy I-38. There is little point in creating such preserves and such a policy when the designation can be removed at the whim of the landowner.

North Mountain NM16

NM16 represents a classic situation of robbing Peter to pay Paul. The owner sold a portion of a rural landholding for conservation (and possibly reaping associated tax benefits) and now seeks to recover all the units the owner would have had if the land had *not* been sold by increasing densities on the remainder area—a portion with very high habitat values and very high fire risk—by up-planning it from rural densities to a semi-rural SR-10 category.

Staff itself had concluded in January that “[d]ue to the remoteness of the property, the application of Semi-Rural designations does not support the project objectives to reduce public costs and promote growth near existing jobs, services and infrastructure” and that such a change was a “major” one that is inconsistent with the Update’s Guiding Principles.” Staff now appears to conclude exactly the opposite, noting that the sale of lands into conservation “mitigates” the destruction. But the issue is not about mitigation of impacts, it is about *planning* consistent with the rules the Board adopted in the Update, including evenhanded application of the Community Development Model. This arbitrary change in position contravenes the Model (LU-1.4) as well as Guiding Principles Nos 4 & 5 and violates Policy LU-6.2 and Policies LU-6.11, LU-9.2, S-1.1 and S-7.1. In addition, this PSR sets a terrible precedent, generating expectations of additional revenue beyond the fair compensation, and tax benefits often received, in a conservation sale.

Pala/Pauma PP 30

PP 30 would suburbanize 526 acres of rural, high-fire risk land by radically changing its designation from RL 40 to SR 2. Opposed by the community, the SR-2 designation would avoid the clustering provisions of the Conservation Subdivision Program and thus literally destroy the very high-value habitat located on the site. It would create inconsistent estate lot subdivision adjacent to a village and add over 100 units in an area east of the County Water Authority line.

Staff had concluded in January that “the property is nearly entirely constrained by steep slopes, floodplain, wetlands, or sensitive environmental habitat” and that “the General Plan principles and policies do not support increased development in areas with sensitive resources and physical constraints.” Staff provides no rational basis why *any* SR-2 density on such an area somehow becomes consistent with the Community Development Model, as well as policies mandating lower densities on high risk, prime agricultural, and habitat rich land (LU-1.1, LU-1.4, LU-6.2, LU-6.11, LU-8.1, LU-9.2, S-1.1, S-7.1 and LU-7.1)

Ramona RM3, RM15 & RM22

RM3 would replace the existing RL 20 designation with an industrial one within a FEMA and County Floodway. Placing structures in a floodway is in direct contravention of Policy S-1.10, which “limits new or expanded uses in floodways to agricultural, recreational, and other such low-intensity uses and those that do not result in any increase in flood levels during the occurrence of the base flood discharge” and which specifically *excludes* “habitable structures.” Staff provides no rational basis for putting industrial uses in such an area.

Ramona RM15

RM15 would change the permitted densities on a nearly 300-acre PSR from RL-40 to SR-4, even though most of the surrounding land is in rural densities. To cure the spot zone, an additional 103 acres would be similarly up-planned, even though the entire area has rich

agricultural soils. The stated rationale for this PSR is an existing tentative map at these densities, even though there is no guarantee that the Map will ever be built out. Almost all the land is constrained by steep slopes and high fire risk. Agricultural lands are found in the eastern portion.

Staff never really addresses these constraints, relying principally on the existence of a tentative map. But the existence of a map should be irrelevant to the planning process, since planning to conform to a tentative map would negate the expiration times that are an integral part of the Subdivision Map Act. Indeed, the very reason that tentative maps have a shelf life is to permit local jurisdictions to plan free from such constraints.

Ramona RM22

Staff had originally concluded that RM22 was inconsistent with the Update's Guiding Principles:

“Property request consists of three parcels in a holding of 200 acres on the eastern side of the Ramona Planning Area. It is adjacent to the RM5 referral, which is also a request to change the land use designation to Rural Lands 40. Like RM5, it is remote, has very high biological value and is within the Very High Fire Hazard Severity Zone. The additional development in this remote, constrained area would not support the Community Development Model or Guiding Principle #9.”

No changes have occurred since then that would alter Staff's conclusions.

San Dieguito SD2

SD2 would convert about 54 acres from SR-4 to SR-2; most of the re-planned land is outside the PSR to cure a spot zone. Again, the stated rationale for this PSR is an existing tentative map at these densities, even though there is no guarantee that the Map will ever be built out. The existence of a map should be irrelevant to the planning process, since planning to conform to a tentative map would negate the expiration times that are an integral part of the Subdivision Map Act. Indeed, the very reason that tentative maps have a shelf life is to permit local jurisdictions to plan free from such constraints. Zoning to conform to a tentative map would negate these statutory time limits. Independent of the map, it is clear the SR-2 designation is inconsistent with the significant habitat values on the site, as well as its location in a high fire risk area.

Valley Center VC7, VC9, VC11, VC20A, VC20B, VC54, VC60, VC61 & VC66

While the above series of PSRs total a relative modest 349 acres, the pattern of spot zoning they would collectively create would drag an additional 2078 acres—an increase of

nearly a factor of 7—into a massive 2,427-acre doubling of density from SR-4 to SR-2—adding 371 units and resulting auto trips to local roads. Over 300 landowners would be affected and the character of the entire community altered to accommodate the economic wishes of a set of vocal landowners one could count on the fingers of both hands. Not surprisingly, the community opposes this radical change.

Much of this land is in active agriculture, much is high fire risk, and other parts contain high habitat value. In addition, a massive zone of 2-acre lots would be created a great distance from any real town center, creating a disjointed land use pattern that is inconsistent with the Community Development Model in the Update. Yet despite inconsistency with the very architecture of the Update, despite the violation of Update policies that mandate *lower* densities on such lands (LU-7.1, LU-6.11, LU-6.2), despite the fundamental change to the physical appearance of the community from re-planning thousands of acres, and despite the wishes of the community, the economic ambitions of a mere handful of landowners would seem to literally trump all else. Where is the connection to the public welfare?

Valley Center VC51

VC51 is another spot zone that would cause 166 acres to be radically up-planned from RL-20 to SR-4 solely to accommodate the purely private ambitions of a single landowner of only 16 acres—an increase in collateral damage of a factor of 10. Not only would the change increase fragmentation through increased unit yield, but also it would result in loss of the clustering benefits of the Conservation Subdivision Program.

This remote and rugged area is unsuitable for semi-rural densities under the Community Development Model (LU-1.1), and the northern portion contains valuable coastal sage scrub habitat. SR-4 densities thus do not conform either to policy LU-6.11 (fire) or LU-9.2 (slope). No conceivable planning rationale supports this PSR.

Valley Center VC57, VC63 & VC64

PSRs totaling 278 acres would require up-planning from SR-4 to SR-2 of a total of 1,340 acres to avoid a spot zone, affecting over 200 property owners—all for the sake of three landowners. While there is some existing parcelization, a total of 238 units would be added. Although the existing density of SR-4 is not ideal for agriculture, its viability on the large amount of prime agricultural land in the area will be further compromised in violation of Policy LU-7.1. High value habitat would be further fragmented in violation of LU-6.2. More 2-acre lots would also be created a great distance from any real town center, again creating a disjointed land use pattern that is inconsistent with the Community Development Model.

Conclusion

The intent for “minor” changes enunciated by Board Members upon the initiation of the PSRs has mushroomed to nearly 16,000 acres. Whether individually small or large, viewed collectively, the above PSRs and the associated changes to avoid spot zoning constitute a major affront to the integrity of the Update and its Guiding Principles and Policies. No rational interpretation of the Update, nor any basis having even the remotest connection to the public welfare, supports the vast majority of the 50-odd PSRs under consideration for processing. EHL urges the Board to abide by the commitments to sound planning it made in the Update and end the PSR process in its entirety.

Very truly yours,

Dan Silver, MD
Executive Director



February 4, 2016

VIA ELECTRONIC MAIL

Peter Eichar
Dept. of Planning and Development Services
5510 Overland Ave
San Diego CA 92123
<Peter.Eichar@sdcounty.ca.gov>

**RE: Notice of Preparation for Property Specific Requests General Plan
Amendment and Rezone – *Additional Comments***

Dear Mr. Eichar:

Endangered Habitats League (EHL) appreciates the opportunity to submit additional comments on the NOP for this project. These comments concern regional planning and climate impacts.

The PSRs grossly violate central Guiding Principles and Policies of the 2011 General Plan. That plan wisely focused growth within existing villages, with opportunities for limited and controlled expansion, as well as a single new urban node. All projected population growth was amply accommodated. Contrary to the adopted plan, the project would place rural residential sprawl in locations distant from infrastructure and services and place major new urban development – via NC-42 – in a similarly rural and habitat-rich location. All of development contemplated in the PSRs is removed from job and activity centers and devoid of current or future meaningful transit orientation. Long-distance auto trips that maximize GHG emissions would inevitably increase.

Going forward, as it considers any newly planned development, the County should, in accord with modern practice, address transportation impacts through transit and multi-modal options rather than simply through more road capacity. The State's shift toward a VMT-based analysis of traffic instead of level-of-service illustrates this direction.

Besides inconsistency with the County's General Plan, the entirety of the PSR GPA and Rezone 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. The County should not undermine the RTP/SCS through the backward-looking PSRs. Indeed, it should not undermine the region's future in terms of climate change through these PSRs. All such impacts on regional planning should be

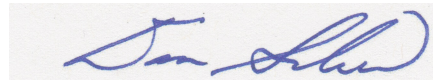
analyzed. In doing so, the DEIR should follow recent court guidance regarding use of a “business as usual” comparison approach (*Ctr. for Biological Diversity v. Dept. Fish & Wildlife*, 62 Cal. 4th 204 (2015)) as well as evaluate consistency with gubernatorial Executive Orders on climate change.

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 PSRs 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.

EHL therefore urges the County should adopt a legally valid revised CAP *prior* to considering dozens of *ad hoc* amendments that take the County down a counterproductive path. Otherwise, the PSR 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.

In conclusion, it is by retaining the integrity and achievement of the 2011 General Plan that the County will best contribute to the future of the region. We again appreciate the chance to work with you on land use and transportation planning.

Yours truly,



Dan Silver
Executive Director

Potrero Community Planning Group
P. O. Box 9
Potrero, CA. 91963

February 4, 2016

To: Mr. Peter Elchar
County of San Diego
Planning and Development Services
5510 Overland Ave., Suite 310
San Diego, CA. 92123

Re: Comments on the Property Specific Requests General Plan Amendment, PSRs GPA

Overview: The proposed project is a Property Specific Requests GPA to the San Diego County General Plan. The proposed project would result in revisions to the existing General Plan Land Use designations and zoning (when necessary for consistency) on private properties including their surrounding study areas, totaling approximately 13,000 acres within approximately 1,149 parcels throughout the unincorporated County. Primarily, the proposed project would change certain Land Use designations within some community planning areas (CPAs) and sub regional planning areas (Sub regions).

Comments:

- 1) Our initial findings were that there was not enough time to respond, the proposal was not consistent with existing plan, and that there was insufficient evidence of a need to change general plan.
- 2) The County recognized that the initial time limit was adjusted to allow for input and comment. The New date for response was adjusted to February 2016. The Potrero Community Planning Group appreciates the effort to allow for our response.
- 3) With the cooperative effort to address future growth in the rural areas of San Diego County contained within the General Plan, the PCPG feels that any amendment to the plan is not consistent with the current plan. Additionally this runs counter to Supervisor Dianne Jacob statement on 7/10/09 at Sandag “it’s real clear to me that when you’re talking about more density, we should in no way be talking about putting it in the unincorporated area, certainly not in the backcountry. It needs to be placed where there is infrastructure, where there’s transits, where there’s commerce and where there’s job centers.”... “When the groundwater is depleted, there is no water for the people that live in these areas. It’s the lifeblood of two-thirds of the portion of the eastern part of our County. So groundwater constraints certainly should be taken into consideration as we talk about numbers and so on.”
- 4) Lastly, the PCPG found insufficient evidence either from the County or developers that there is a real need to change the density and consequently the quality of life in our rural areas. As such, that lack of proof the PCPG felt, does not warrant a change to the existing San Diego County General Plan.

Thank you for your consideration.

The Potrero CPG voted on 11 February 2016, 5 ayes, 0 nay, 3 absent, 1 vacancy after public participations and board discussion to send response on the issue.

Sincerely,

Carl Meyer
Chairman, Potrero CPG
(619) 820-6429

Hannah Alonso
Member, Potrero CPG

Roberto Uribe Jr.
Member, Potrero CPG

Distribution: Mr. Mark Wardlaw, Director PDS

From: [Jim Elliot](#)
To: [Eichar, Peter](#); [Wardlaw, Mark](#)
Subject: comment toProject Number PDS2012-3800-12-005; PDS2014-REZ-14-006
Date: Monday, February 29, 2016 5:10:19 PM

Mr. Mark Wardlaw, Director Planning & Development Services

5510 Overland Avenue, Suite 310

San Diego, CA 92123

RE: PROPERTY SPECIFIC REQUESTS GENERAL PLAN AMENMDENT & REZONE Notice of Preparation of
an Environmental Impact Report

Comments: Project Number(s) PDS2012-3800-12-005; PDS2014-REZ-14-006

Mr. Wardlaw:

It has come to our attention that changes to the County's General Plan Amendment (GPA) are being considered. The changes to be made are in involved with Project Numbers PDS2012-3800-12-05 and PDS2014-REZ-14-006. The proposed changes include an update to the Land Use designations and some possible changes to the current zoning plans.

As members of the Trails Advisory Committee for the City of San Marcos, we have an obligation to watch for changes to the County's GPA that may adversely affect trail access and usage. Our committee's purpose it to augment the usage of trails within the city of San Marcos and promote the healthy lifestyle that accompanies the hiking, running, biking or equestrian uses of our trails system.

A number of the trails used in San Marcos link to other trails and paths outside of city control but are part of the County of San Diego trail system. We strongly request any changes that are associated with these projects be mindful of the trail system and open space usage that our city has cultivated and the residents of the community desire. We urge the county planners to include, in any amendment to the land use, provisions for connectivity between existing trails, expansion of current trails, or creation of new trails. All proposed changes should follow guidelines as called out in the Master Parks and Trails Plan and the Twin Oaks Valley Community Plan.

It is equally important that the integrity of the open space be saved or restored for current and future generations. People choose to live here in the North County because of the uniqueness of the character of area and they enjoy the solitude that comes with the multitude of available open space. It is important to listen to residents of these areas before any proposed changes are planned. A robust trail system and the preservation of our open space would be beneficial to all residents of the County of San Diego.

Sincerely,

The Trails Advisory Committee, City of San Marcos



February 26, 2016

Mr. Mark Wardlaw, Director Planning & Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

RE: PROPERTY SPECIFIC REQUESTS GENERAL PLAN AMENMDMENT & REZONE Notice of Preparation of an
Environmental Impact Report

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Sincerely,

The Trails Advisory Committee, City of San Marcos

**PALA TRIBAL HISTORIC
PRESERVATION OFFICE**

PMB 50, 35008 Pala Temecula Road
Pala, CA 92059
760-891-3510 Office | 760-742-3189 Fax



December 16, 2015

Peter Eichar
County of San Diego
5510 Overland Ave, Suite 310
San Diego, CA 92123

Re: Project Numbers PDS2012-3800-12-005; PDS2014-REZ-14-006

Dear Mr. Eichar:

The Pala Band of Mission Indians Tribal Historic Preservation Office has received your notification of the project referenced above. This letter constitutes our response on behalf of Robert Smith, Tribal Chairman.

We have consulted our maps and determined that the project as described is not within the boundaries of the recognized Pala Indian Reservation. It is, however, within the boundaries of the territory that the tribe considers its Traditional Use Area (TUA). Therefore, we request to be kept in the information loop as the project progresses and would appreciate being maintained on the receiving list for project updates, reports of investigations, and/or any documentation that might be generated regarding previously reported or newly discovered sites. Further, we may recommend archaeological monitoring pending the results of site surveys and records searches associated with the project. If the project boundaries are modified to extend beyond the currently proposed limits, we request updated information and the opportunity to respond to your changes.

We appreciate involvement with your initiative and look forward to working with you on future efforts. If you have questions or need additional information, please do not hesitate to contact me by telephone at 760-891-3515 or by e-mail at sgaughen@palatribe.com.

Sincerely,

A handwritten signature in black ink, reading "Shasta C. Gaughen", is positioned above the typed name.

Shasta C. Gaughen, PhD
Tribal Historic Preservation Officer
Pala Band of Mission Indians

ATTENTION: THE PALA TRIBAL HISTORIC PRESERVATION OFFICE IS RESPONSIBLE FOR ALL REQUESTS FOR CONSULTATION. PLEASE ADDRESS CORRESPONDENCE TO **SHASTA C. GAUGHEN** AT THE ABOVE ADDRESS. IT IS NOT NECESSARY TO ALSO SEND NOTICES TO PALA TRIBAL CHAIRMAN ROBERT SMITH.