

**Comments on the San Diego County Property Specific Requests
[PSR] General Plan Amendment and Rezone Subsequent
Environmental Impact Report [SEIR] PDS2012-3800-12-005,
PDS2014-REZ-14-006; LOG NO. PDS2012-ER-12-00-003; SCH NO.
2015121012. T**

I12-1

Because of the time constraints of the public review period for the SEIR in connection with the 2017 holidays, along with the complexity of the SEIR, only a quick review has been possible. The release of the SEIR to the public over the holiday period minimizes the public's opportunity to review and comment on such a large and important project [even acknowledging the extension of the review period to 60 days, the scope of the documentation requiring review, the technical complexity of it and the lack of professional assistance to evaluate it make the review exceedingly challenging]. Such a move flouts the goal of maximizing public comment.

I12-2

There may be many issues lurking within the SEIR, however, my cursory review focuses on three areas that fail to be adequately mitigated and are inconsistent with the General Plan, the Valley Center Community Plan, and potentially a series of state laws.

Agriculture

I12-3

Three of the subject PSRs are presently in agricultural preserves [VC7+, VC51, & VC57] and one has a Williamson Act contract. Applying SR2 to the study areas as the proposed and alternative maps indicate instead of SR4 or a much lower density land use designation as previously agreed in the General Plan Update [GPU] disregards the intent of GPU policy LU 7.1, which calls for protecting agricultural lands with a "lower-density land use designation." Potentially 5,473 acres of the 6,830 acres of County identified agricultural land within the project study areas will be at risk of being directly converted to non-agricultural land. Over 1900 acres of agricultural land with the greatest potential impacts are in two of the Valley Center PSRs [VC7+ and VC57].

I12-4

I12-5

The Valley Center Community Plan [VCCP] also calls for the preservation of agricultural land uses. It is recognized that the influence of adjacent land uses on agricultural uses can be detrimental to successful farming. The disruption of farming by a variety of economic, social and creeping urban practices has been the pattern in San Diego County and, in particular, Valley Center. The potential loss of agricultural uses through the land use designations in the proposed and alternative maps cannot easily be undone and will critically change the community character that the VCCP

I12-6

set out to protect. Further, The VCCP was built around the concept of the Community Development Model that defines the higher density land uses at the community center, then gradually “feathering out” to lower densities at the edges of the planning area. Such a model benefits farming by preserving larger parcels that can offer greater scale and efficiency than the smaller 2-acre parcels suggested by the County as being adequate. Likely, the smaller 2-acre threshold for agricultural success is based as much on the greater appraised value of such parcels as some notion of farming economic success.

I12-7

About 1114 acres of the three Valley Center PSRs are evaluated as prime or unique farmland. The Valley Center PSRs also possess “prime” agricultural soils that are a statewide resource. The potential loss of those lands would be an irretrievable loss to the County’s agricultural effort and cumulatively with other large development projects in the approval pipeline would, indeed, rise to a serious level of significance. If this project were to be adopted as proposed, it would be a large incremental step toward urbanization that would facilitate even more such decisions that would increase density in Valley Center and decimate agriculture.

I12-8

As we move to higher density land uses in communities like Valley Center, the future of farming becomes progressively bleaker and bleaker as recognized in the state’s Right To Farm Act, the Williamson Act, the Open Space Subvention Act as well as several County ordinances and Board of Supervisors policies. A more rational interpretation of these laws, ordinances and policies would arrive at the conclusion that the land uses in the proposed and alternate maps subvert agriculture and rise to a level of damaging significance that cannot be tolerated if agriculture is to be preserved as the GPU exhorts.

Traffic

I12-9

The SEIR notes the dramatic increase in population in the PSR analysis areas between 2000 and the 2010 census [26%] and that the increase in these areas exceeds the countywide growth rate [10%]. In the same period the PSR’s housing stock rose 23% nearly doubling the figure for the county as a whole. However, with the already projected growth in Valley Center in the GPU plus the addition of even greater densities as a result of the proposed PSR project, no new roads are to be constructed to mitigate the significant impacts of more traffic. Rather, the SEIR proposes to add more road segments to the list of failing roadways in the County that, for what appears to be a lack of will, cannot be mitigated.

I12-10

As noted in the SEIR, the 1507 person increase in population for the Valley Center CPA resulting from the aims of the PSR project amounts to an 8 percent increase over 2015 population estimates. It goes on to suggest that such an increase in the context of the decadal census population increase [20% 2000-2020] is insignificant. However, this seems to be fake math, or at least deceptive math. Instead of the expected 20% population increase, these numbers suggest that the actual increase,

I12-10
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with the PSR project, would be 40 percent larger. The additional population will generate 7,570 Average Daily Trips [ADT]. Such a significant increase over the already planned and vetted increase addressed in the GPU, without adding significantly to the road network expected to serve that population, will lead to a traffic calamity.

I12-11

There is no plan to enhance the presently ineffective network of public roads with the adoption of this project. The current GPU addresses Valley Center's expected population growth and has even added a few additional new roads to the GPU mobility element map to accommodate that growth. The PSR project acknowledges the current deficient state of the road network in Valley Center, the expected growing need for a more functional road network and it suggests that the impact of the additional dwelling units proposed by this project is not considered significant in the context of planned regional growth. But, I am concerned with what such added growth will do in the context of Valley Center. The SEIR should not conflate a regional plan with the plans for the specific CPAs that will be impacted.

I12-12

The SEIR goes on to acknowledge the potentially significant cumulative impacts on roads related to population growth if projects like Lilac Hills Ranch are factored in. But, it fails to propose how the road network will handle the extra vehicle miles travelled except to say the impacts will be significant and unavoidable. All of the significant population growth, either direct or cumulative, will further impact emergency response and evacuation over a road network that is presently stressed.

I12-13

The SEIR concludes, rightly, that impacts of the PSR project on transportation in Valley Center will exacerbate an already congested road network, and even with the mitigation proposed, will leave our community with significant and unavoidable impacts.

Climate Change

I12-14

The SEIR displays a picture of green house gas [GHG] production that is consistent with the overwhelming conclusion of the world's scientific community. The need to reduce GHG is more than evident. The County also acknowledges that projects like the PSRs and the likely subsequent developments [Lilac Hills Ranch, Warner Ranch, Newland Sierra], which will also cause land use densities to increase, will make attaining the still undetermined CO₂ limits of the revised Climate Action Plan [CAP] even more difficult. Since 45% of the CO₂ in San Diego County is generated in vehicle exhaust, the need to reduce vehicle miles travelled [VMT] and average daily trips is paramount.

I12-15

The PSRs, instead, will add to the CO₂ total significantly. Stating that these projects must comply with the CAP in the future in order to proceed defies belief. A more prudent direction would be to not encourage higher rural densities that will result in more VMT in the first place. Maintaining larger parcels of open space/agricultural land is a better approach to minimizing vehicular CO₂.

I12-16

[Relying on green building standards for new buildings is laudable, but that is a relatively small portion of the problem. Reducing VMT by concentrating density in areas where jobs and services are more abundant is a more obvious step to reducing GHG. The proposed PSRs should be judged against the revised CAP GHG standard once it is adopted. There is no need to hurry the proposed changes through approval before the new, more definitive standard is determined and reviewed.

I12-17

[The conclusion of the SEIR that the PSR project would produce less than significant GHG impacts because of the proposed off-site mitigation measures that could be enforced is shortsighted. It allows San Diego County to pollute the air affecting the entire world by the purchase of carbon credits from elsewhere in the world. The goal should be to reduce GHG throughout the entire world, not just shift the responsibility to areas that already appreciate the need for GHG reduction.

I12-18

[All three areas of agriculture, traffic and climate change are intertwined. As stated earlier, there are likely other concerns in the lengthy and technical SEIR that will have a significant impact on the Valley Center community. But time and the schedule of the VCCPG have allowed for only a cursory review.

Responses to Letter I12, Hutchison, Steve

- I12-1 The County acknowledges the comment expressing concern that the release of the document for public review included the Christmas and New Year holiday period.

Please see response to comment I1-3.

- I12-2 This comment states the commenter's cursory review focuses on issues outlined in the subsequent comments that fail to be adequately mitigated and are inconsistent with the General Plan, the Valley Center Community Plan, and potentially a series of state laws. This comment provides an introduction to the next comments.

The County acknowledges the comment. No further response is necessary.

- I12-3 This comment states that PSRs VC7+, VC51, and VC57 are located in agricultural preserves, and one contains a Williamson Act Contract. This comment implies the proposed project disregards the intent of GPU Policy 7.1.

The Draft SEIR (Section 2.2.3.1) discloses that PSR Analysis Areas VC7+ and VC57+ contain County-identified agricultural land and implementation of the proposed project would result in potentially significant impacts. Impacts on agriculture are discussed in Sections 2.2.3.1 and 2.2.3.3 of the Draft SEIR, and Tables 2.2-2, 2.2-4, and 2.2-5 quantify the total area of agricultural resources within each PSR Analysis Area and the combined total agricultural land that would have the potential to be converted to non-agricultural resources. As stated in the Draft SEIR, based on the potential impacts by land use designation, 4,724 acres of County-identified agricultural land within PSR Analysis Areas have the potential to be impacted. This section concludes that impacts would remain significant and unavoidable after implementation General Plan policies and mitigation measures of the Draft SEIR. This includes General Plan Policy LU-7.1 of the Land Use Element, which calls for protecting agricultural lands with "lower-density" land use designations that support continued agricultural operations.

Section 2.9.3.2 of the Draft SEIR provides a consistency analysis for each of the PSR Analysis Areas, including VC7+, VC51, and VC57+ with Policy LU-7.1. That section also a detailed discussion (on page 2.9-42) of the research and analysis that went into the development of an SR-2 threshold for addressing the Policy LU-7.1 reference to a "lower-density land use designation" that supports continued agricultural operations.

- I12-4 This comment states the Proposed Project would result in up to 5,473 acres of the 6,830 acres of the County-identified agricultural land within the PSR Analysis Areas potentially being converted to non-agricultural land. Further, this comment states PSR Analysis Areas VC7+ and VC57 would experience the greatest potential impacts.

The County would like to clarify that the analysis on page 2.2-5 of the Draft SEIR states that "PSR Analysis Areas include a total of 5,473 acres of FMMP designated agricultural resources and 6,830 acres of County identified agricultural lands." The comment is generally consistent with the findings of the Draft SEIR (Section 2.2.3.1); however, the potential impact for direct conversion of County identified agricultural land to non-agricultural uses is for 4,724 acres

(Impact AG-1) not 5,473 as stated in the comment. Table 2.2-4 does state that over 1,900 acres of this impact would be attributed to PSR Analysis Areas VC7+, VC51, and VC57+.

- I12-5 This comment states that the Valley Center Community Plan (VCCP) aims to preserve agricultural land uses, and potential loss of agricultural uses from the influence of adjacent land uses can occur.

The County acknowledges the comment. The Draft SEIR recognized that the Proposed Project could result in a potentially significant impact associated with the indirect conversion of agricultural resources to non-agricultural resources (Impact AG-2). A consistency analysis of the proposed project with each of the County's applicable community plans in which PSR Analysis Areas are proposed is provided in Section 2.9.3.2 of the Draft SEIR. The Draft SEIR states "As discussed in the review of General Plan Policy LU-7.1 in this Section, the SR-2 designation proposed in Analysis Areas VC7+ and VC57+, and the SR-4 designation proposed in Analysis Area VC51 would be anticipated to support continued agricultural uses, based on research of the County's Guidelines for Determining Significance, the 2011 PEIR, and other County documents. Given the small size of Analysis Area VC67, the proposed change for that Analysis Area would not be anticipated to substantially impact the availability of properties designated/zoned for agriculture. Thus, a consistency finding can be made." Page 2.9-85. Please see the analysis related to LU-7.1 on pages 2.9-45 and 2.9-46 of the Draft SEIR.

- I12-6 This comment describes the VCCP's use of the Community Development Model, which includes a concentration of higher density land uses at the community center and gradually lower densities at the edges of the planning area. This comment asserts this model is beneficial to farming practices as it preserves larger parcels that can offer greater scale and efficiency than the 2-acre parcels that have been identified as adequate by the County.

The County does not necessary disagree that densities less than SR-2 may afford greater benefits to continued agricultural use of land; however, the County stands by its documentation that densities of SR-2 can facilitate continued agricultural use of land.

- I12-7 This comment summarizes various agricultural resources of the three Valley Center PSR Analysis Areas and states the loss of these agricultural resources would constitute direct and cumulatively significant impacts.

The analysis presented in Section 2.2 of the Draft SEIR determined the Proposed Project would result in direct and cumulative impacts related to direct and indirect conversion of agricultural resources, and direct and indirect loss or conversion of forestry resources (Impacts AG-1 through AG-6) and that these impacts would remain significant and unavoidable for impacts AG-1, AG-2, AG-4 and AG-5 with implementation of General Plan policies and mitigation measures.

- I12-8 This comment implies that permitting higher density land uses in communities such as Valley Center with available agricultural resources impacts the future of farming in the area. .

The County acknowledges the comment. Staff believes these issues have been addressed in previous comment. Please refer to responses to comments I12-3 through I12-7 above.

- I12-9 The comment cites growth rates in population and housing stock in the County, then notes that despite the additional growth projected by the GPU and the additional growth of the Proposed Project, no new roads are to be constructed to mitigate significant traffic impacts of the project.

The County acknowledges this comment. This PSR GPA proposes changes to the existing General Plan designations that establish allowable land uses and intensities of development. The purpose of the Draft SEIR is to inform decision makers about the potential impacts that may be associated with the maximum potential development on a programmatic scale according to the intensities allowed by the land use designations assigned. Therefore, the Draft SEIR does not analyze building-specific impacts or efficiencies associated with construction, maintenance, or operation activities because they are still unknown at this time, and analysis of unknown activities would be speculative. The purpose of the program Draft SEIR is to identify potential impacts that could occur during project-specific actions that could occur as part of the implementation of the proposed project. The Draft SEIR intent is to identify where and to what extent impacts would be likely to occur. All subsequent project-specific proposals would undergo project-level CEQA analyses where specific impacts and mitigation measures could be identified. Therefore, the Draft SEIR is adequate and complies with CEQA. Traffic from the projects listed in the Draft SEIR were evaluated using the same methodology as those utilized in the County of San Diego General Plan and tier off of the County of San Diego's General Plan Update Program EIR. As of the publication of the Draft SEIR, the County of San Diego has not received any applications for the PSRs contained in the Draft SEIR. Consequently, it would not be possible to evaluate project-specific impacts, project-specific mitigation measures, or Transportation Demand Management (TDM) measures at this time. Therefore, conservatively under CEQA, significant impacts that require roadway widening, or the construction of new roadways, beyond those identified in the County of San Diego Mobility Element are considered to be significant and unavoidable.

The Final SEIR will include a Mitigation, Monitoring, and Reporting Program (MMRP) modeled after the General Plan implementation plan, which explains how General Plan policies and mitigation measures are to be implemented as these areas become developed.

- I12-10 The comment states that projected growth from the PSR project in the Valley Center CPA would be much larger and result in more ADT than the Draft SEIR describes.

Refer to response to comment I12-9. This PSR GPA is proposing changes to existing General Plan designations that establish allowable land uses and intensities of development. The PSR GPA cannot predict when and how any future development will occur, but can analyze the maximum potential development on a programmatic scale according to the intensities allowed by the land use designations assigned. Future development plans proposed under the proposed project would go through subsequent discretionary review and would need to conduct a land use consistency review of the future development projects and consider project-related mitigation measures.

As is standard with the methods utilized in the County, the San Diego Region and generally within the nation as a whole, vehicular traffic generation is projected based on land use

quantities and not population. The rates and calculations used to project the additional traffic that is anticipated to be generated by the PSRs is displayed in Table 3.1 of the proposed project's Traffic Impact Assessment (TIS) (provided as Appendix E to the Draft SEIR).

As of the publication of the Draft SEIR, the County of San Diego currently has not received any applications for the PSRs identified and addressed in the Draft SEIR. Therefore, these projections represent a potential worst-case scenario, in assuming that all parcels will be built to their maximum densities, based on the proposed land use changes. To fully represent a worst-case scenario, these projections were not constrained based on projected population growth or economic conditions.

Additionally, the Final SEIR will include an MMRP modeled after the General Plan implementation plan, which explains how General Plan policies and mitigation measures are to be implemented as these areas become developed.

- I12-11 The comment implies the current deficient state of localized roadways in the Valley Center CPA and the expected need for a more functional road network is considered less than significant in the context of planned regional growth, and that the local planning area conditions should not be conflated with regional plans for transportation.

Section 2.15.3.1 of the Draft SEIR identified the potential impacts that could occur from build out of the proposed GPA.

Refer to response to comment I12-9. Specific projects within the PSR Analysis Areas would still be required to comply with the CEQA process by conducting a project-level CEQA analysis and identifying project-specific mitigation measures, as appropriate.

Additionally, the developments within the PSR Analysis Areas would still be required to participate in the County of San Diego Transportation Impact Fee (TIF) program. The TIF program was designed to allocate and collect fair share responsibilities from new development within the County to mitigate their cumulative impacts by building out the County's Mobility Element and maintaining consistency with the County of San Diego's General Plan. Therefore, by participating in the TIF program potential future PSR projects will be contributing their fair share towards the roadway improvements identified in the County's Mobility Element and ultimately mitigating their cumulative impacts within the unincorporated County and region.

- I12-12 The comment states that the Draft SEIR acknowledges the potentially significant cumulative impacts on roadways from cumulative projects, but fails to explain how the road network will handle the extra vehicle miles travelled, other than that impacts would remain significant and unmitigable.

Refer to the response to comment I12-9 for discussion regarding the cumulative impacts due to the PSRs projects.

In regards to the GPAs that are currently in process, such as the Lilac Hills Ranch and the Newland Sierra projects, as these projects have not been approved by the County they were not incorporated into the current General Plan Buildout Plus PSRs projects conditions since it

is not known if these GPAs will be changed or abandoned prior to their adoption. However, for informational purposes an analysis of the current General Plan Buildout Plus PSRs projects plus GPAs in process was conducted. This analysis was provided in Chapter 5 of proposed project's TIA (see Appendix E of the Draft SEIR) and Section 2.15.4 of the Draft SEIR. The Draft SEIR concluded that the proposed project would result in a significant and unavoidable cumulative impact associated with traffic in excess of level of service (LOS) standards. The Draft SEIR identified adopted General Plan policies (LU-5.1, LU-10.4, LU-11.8, LU-12.2, M-1.1, M-1.2, M-1.3, M-2.1, M-2.2, M-2.3, M-3.1, M-3.2, M-4.2, M-5.1, M-5.2, M-9.1, and M-9.2), as well as adopted General Plan Program EIR mitigation measures (Tra-1.12, Tra-1.3, Tra-1.4, Tra-1.5, Tra-1.6, and Tra-1.7) to reduce impacts; however, the Draft SEIR concluded impacts would remain significant and unavoidable. Furthermore, the project's potential impacts on emergency access were identified in Section 2.15.3.3 of the Draft SEIR, which concluded that impacts would be less than significant with implementation of General Plan Policies M-3.3, S-3.4, S-3.5, and S-14.1 and adopted General Plan PEIR Mitigation Measures Tra-4.1 through Tra-4.4. The County Board of Supervisors will take the commenter's concern regarding the proposed project into consideration when deciding whether to approve the proposed project.

- I12-13 This comment states that the Draft SEIR rightly concludes that the Proposed Project's impacts on transportation within Valley Center will exacerbate an already congested road network, and that, even with implementation of mitigation proposed, impacts will remain significant and unavoidable.

This comment is consistent with the findings of the Draft SEIR (Section 2.15.6.1), which discloses that even with implementation of adopted General Plan policies and mitigation measures, the proposed project's impacts on traffic and level of service standards would remain significant and unavoidable.

- I12-14 This comment implies the Draft SEIR includes generally accepted conclusions regarding the production of greenhouse gases (GHGs) and emphasizes the need to reduce vehicle miles travelled (VMT) to attain carbon dioxide (CO₂) limits of the revised Climate Action Plan (CAP).

The County acknowledges the comment and agrees that data show 45% of GHG emissions in San Diego County are from the on-road transportation category (page 2.17-2 of the Draft SEIR). The analysis presented in Section 2.17 of the Draft SEIR determined the Proposed Project would have potentially significant direct and cumulative impacts related to generation of greenhouse gas emissions and conflicts with an applicable plan, policy or regulation (Impacts CC-1 through CC-4), but that these impacts would be less than significant with implementation of General Plan policies and mitigation measures and new mitigation measure M-GHG-1.

- I12-15 This comment states the Proposed Project will significantly contribute to CO₂ levels, and compliance with the CAP in the future is not adequate and higher densities in more rural areas should not be encouraged which results in more vehicle miles travelled.

The PSR GPA is programmatic in nature as it assigns land use designations only and does not include any specific information that would be associated with actual development projects. The Draft SEIR analyzes the maximum development potential on a programmatic scale

associated with the land use intensities allowed by the land use designations assigned. This information would be analyzed in the environmental analysis of any future development projects, which are generally unknown at this time and are not part of the GPA.

A summary of the total unmitigated construction and operational emissions from all the PSR Analysis Areas and the former Champagne Gardens Specific Plan (CGSP) Area was provided in Tables 2.17-2 and 2.17-3, and concluded the proposed project is inconsistent with existing General Plan land use and zoning designation and would result in a more GHG-intensive project.

As discussed in Section 2.17.5.1 of the Draft SEIR, mitigation of GHG impacts does not rely solely on compliance with the CAP (i.e., mitigation measure M-GHG-1) but also includes up to 10 other mitigation measures (CC-1.1 through CC-1.6, CC-1.9 through CC-1.18) that were identified in the Adopted 2011 PEIR as well as the incorporation of two adopted General Plan policies (COS-15.1 and COS-17.1). Future development occurring under the proposed project, if approved, would require further environmental analysis, which would include additional mitigation measures to reduce project-specific GHG impacts.

- I12-16 This comment suggests that the reduction of VMT through concentration of high density in areas where jobs and services are more abundant is more effective at reducing GHG than relying on green building standards and that the Proposed Project should be judged against the revised CAP requirements once it is adopted.

See response to comment I12-15. Mitigation of GHG impacts does not rely solely on implementing green building standards, but also includes up to 10 mitigation measures (CC-1.1 through CC-1.6, CC-1.9 through CC-1.18) that were identified in the Adopted 2011 PEIR, the incorporation of two adopted General Plan policies (COS-15.1 and COS-17.1), and compliance with the CAP (M-GHG-1). Future development occurring under the proposed project, if approved, would require further environmental analysis, which would include additional mitigation measures to reduce project-specific GHG impacts. Therefore, this SEIR is adequate and complies with CEQA. Further, the Climate Action Plan was approved by the Board of Supervisors on February 14, 2018.

- I12-17 This comment implies that off-site mitigation proposed to reduce impacts associated with the generation of GHGs is shortsighted and the purchase of carbon credits shifts the responsibility for GHG reduction elsewhere.

See response to comment I12-15. Mitigation of GHG impacts does not rely solely on the purchase of carbon credit off site but also includes up to 10 mitigation measures (CC-1.1 through CC-1.6, CC-1.9 through CC-1.18) that were identified in the Adopted 2011 PEIR, the incorporation of two adopted General Plan policies (COS-15.1 and COS-17.1), and compliance with the CAP (M-GHG-1). Future development occurring under the proposed project, if approved, would require further environmental analysis, which would include additional mitigation measures to reduce project-specific GHG impacts. Also, the County concluded that with implementation of the General Plan policies and the proposed mitigation measures, the proposed project's impacts would be reduced to a level of below significant. Please also see response to comments O3-113 and O3-130.

I12-18 This comment makes a conclusory remark regarding agriculture, traffic, and climate change impacts and also implies other concerns in the Draft SEIR are likely to be identified that affect the Valley Center community, but the commenter had limited time to review the lengthy and technical SEIR.

The County acknowledges the comment. No further response is necessary.