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**Subject:** PSR-GPA, PDS2012-3800-12-005,PDS2014-REZ-14-006; LOG No. PDS2012-ER-12-00-003; SCH No. 2015121012  
**Date:** Monday, February 12, 2018 9:39:14 AM

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To: Kevin Johnson  
From: Rick Gittings

Subj: PSR-GPA for NC 38 North County Metro Sub-regional Planning Area-Palmer and Yasukochi properties: SR-2 to SR-1

I14-1

This letter is to urge the County staff and Board of Supervisors to change the current land use designation from SR-2 to SR-1. Both of these properties have been analyzed in the County staff's EIR for the PSR GPA and while there are some constraints on both properties, those constraints are not significant enough to delay the change in GPA designation/zoning from SR-2 to SR-1.

I14-2

Both properties are owned by families who have aged in place and no longer farm the properties themselves. The Palmer property currently is for sale by the 85 year old widow, who has never farmed the property, but rather leased it to a farming family who very rarely, if ever farms more than 2 acres of the available 13 acres. The Yasukochi property was farmed by the family for over 40 years but none of the grandchildren seem interested in continuing the farming operation and it has also been leased out periodically to a grower of sunflowers. Neither of these properties are significant agricultural operations and you will not be "saving" prime agricultural land by leaving it SR-2. The property abuts the City of San Marcos where the GPA/zoning for the surrounding land uses is 1 acre minimum lots, typically overlaid with an agricultural designation so residents can continue to use the property as both their residence as well as having the opportunity to do some small scale farming or keep farm animals for various reasons. SR-1 for these properties would provide the same benefit to the Palmer and Yasukochi families or to the future purchasers of the properties (both properties are for sale, although the Yasukochi family has not listed their property with a real estate broker). By altering these properties from SR-2 to SR-1 you would be providing the opportunity for the owners to subdivide the properties to a size that is more in keeping with the surrounding land uses in the southern end of Twin Oaks Valley without such a drastic change in density that would be considered spot zoning or unrealistic for the community. It may also provide some limited relief in our housing shortage, while still providing for the opportunity to conduct agricultural operations on the properties whether they are ever subdivided or not.

I14-3

Both properties are very flat but have some floodplain/wetland/habitat issues so between the two properties based on a land use analysis the maximum number of single family units that could be created (assuming a 1 acre minimum lot size) would be approximately 22 single family units, based on the 29 acres reflected in your staff report (77 acres in PSR, 44 acres in NC48 and 4 acres in NC41).

I14-4

In conclusion, I would like to thank the staff and Board for your willingness to study the proposed changes requested by the property owners and we would ask that your decision is to allow the change from SR-2 to SR- on both the Palmer and Yasukochi properties.

## Response to Comment Letter I14

**Rick Gittings**  
**February 12, 2018**

**I14-1** The County acknowledges the commenter's support for the change to SR-1 for the Palmer and Yasukochi properties within PSR Analysis Area NC38+.

**I14-2** This comment provides background remarks regarding the agricultural operations on the Palmer and Yasukochi properties, and provides arguments for approving the proposed change to SR-1 on these properties.

As discussed in Section 2.2.3 of the Draft SEIR, potentially significant impacts were identified related to direct and indirect conversion of agricultural resources (AG-1 and AG-2, respectively), including for PSR Analysis Area NC38+. As discussed in Section 2.2.5 of the Draft SEIR, these impacts were found to be significant and unavoidable after the implementation of General Plan policies and mitigation measures.

This comment also discusses surrounding land uses. For clarification, the Draft SEIR describes the existing land use setting for NC38+ in Section 2.9, Land Use. The Draft SEIR states the current surrounding designations are SR-2 and SR-10 to the north, west and east, and higher residential development in the City of San Marcos and to the south and further west.

The comment does not raise any issues regarding the Draft SEIR; therefore, no further response is necessary.

**I14-3** This comment suggests that the maximum number of potential single family homes on the Palmer and Yasukochi properties would be 22 residences.

Staff prepared estimated density calculations for the different ownerships with consideration of GIS-estimated steep slope acreage in the slope dependent proposed SR-1 designation. Under the Proposed Project Map (all SR-1), the 28-acre Yasukochi property would be estimated to yield a maximum of 28 lots. The 14.7-acre Palmer property would be estimated to yield a maximum of 14 lots. Site constraints (particularly the floodplain and estimated wetlands areas) could limit the feasibility of achieving these potential densities.

The Yasukochi property is the NC38 PSR and the Palmer property is just one four properties that make up the NC48 PSR. The NC38+ Analysis Area includes NC38, NC41, and NC48, with no Study Area. Staff has determined that the commenter was under different assumptions, regarding the PSR numbers and ownerships. The Draft SEIR analyzes potential impacts at a programmatic level and does not discuss the

ownership entities of individual properties. In addition, some of the ownerships (of parcels covered in the GPA/Rezone) have changed since the 2012 Board direction.

The comment does not raise issues regarding the Draft SEIR; therefore, no further response is necessary.

**I14-4** This comment reiterates the commenter's support for changing the Yasukochi and Palmer properties to a land use designation of SR-1.

This comment does not raise issues regarding the adequacy of the Draft SEIR; therefore, no further response is required.