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February 12, 2018

File Number 3300300

Mr. Kevin Johnston
Planning and Development Services
County of San Diego
5510 Overland Avenue, Suite 110
San Diego, CA 92123

Dear Mr. Johnston:

SUBJECT: Property Specific Requests General Plan Amendment Draft
Environmental Impact Report

MEMBER AGENCIES

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Carlsbad
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Coronado
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County of San Diego

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Thank you for the opportunity to comment on the County of San Diego's Property Specific Requests General Plan Amendment Draft Environmental Impact Report (EIR). The San Diego Association of Governments (SANDAG) is submitting comments based on the policies included in San Diego Forward: The Regional Plan (Regional Plan). These policies will help provide people with more travel and housing choices, protect the environment, create healthy communities, and stimulate economic growth. The SANDAG comments are submitted from a regional perspective emphasizing the need for better land use and transportation coordination.

General Plan Update (2011)

Please take into consideration consistency with guiding plans for the region. In 2011, SANDAG supported the vision and goals of the San Diego County General Plan Update, which shifted "20 percent of future growth from eastern backcountry areas to western communities...reflect[ing] the County's commitment to a sustainable growth model that facilitates efficient development near infrastructure and services, while respecting natural resources and protection of existing community character in its extensive rural and semi-rural communities."

SANDAG supports the goals and objectives currently laid out in the 2011 San Diego County General Plan, as they encourage smart, sustainable growth and reinforce the principles set forth in the Regional Plan. While General Plans are meant to be dynamic documents updated to reflect market forces, population growth, and trends, SANDAG supports key land use principles that preserve natural resources and limit urban sprawl. In evaluating the environmental impacts of this project, please consider whether this project is consistent with the goals of the San Diego County General Plan and the Regional Plan.

Smart Growth

L3-4

As stated above, SANDAG encourages smart, sustainable growth that reinforces principles stated in the Regional Plan. The SANDAG Smart Growth Toolbox and Smart Growth Design Guidelines provide planning, visualization, and financial tools to show how smart growth principles can be put into practice to focus density in and around existing unincorporated communities to reduce vehicle miles traveled and to achieve mixed-use and transit-oriented development. These principles also can be put

L3-5

into practice to help achieve similar goals outlined in the County's Climate Action Plan (scheduled to be adopted February 14, 2018).

When available, please send any additional environmental documents related to this project to:

L3-6

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

We appreciate the opportunity to comment on the County of San Diego's Property Specific Requests General Plan Amendment Draft EIR. If you have any questions, please contact me at (619) 699-1944 or coleen.clementson@sandag.org.

Sincerely,



COLEEN CLEMENTSON
Principal Planner

CCL/KHE/kwa

Responses to Letter L3, San Diego Association of Governments (SANDAG)

- L3-1 This comment provides introductory remarks thanking the County for the opportunity to comment and stating that their comments on the Draft SEIR are based on the policies included in *San Diego Forward: The Regional Plan* (Regional Plan), emphasizing the need for better land use and transportation coordination.

The County acknowledges the comment. This comment does not pertain specifically to the analyses in the Draft SEIR. No further response is required.

- L3-2 This comment describes SANDAG's support for the 2011 General Plan Update (GPU) and requests consideration for consistency with the guiding plans for the region.

The County acknowledges the comment. A General Plan consistency analysis was provided in Section 2.9.3.2 of the Draft SEIR. This comment does not pertain specifically to the analyses in the Draft SEIR. No further response is required.

- L3-3 This comment describes SANDAG's support for the goals and objectives laid out in the 2011 GPU, as they reinforce the principles set forth in the Regional Plan that encourage smart, sustainable growth. This comment requests consideration of whether the proposed project is consistent with the goals of the County's General Plan in evaluating the environmental impacts associated with the project.

The County acknowledges the comment. Section 2.9.3.2 of the Draft SEIR provides a consistency analysis of the project with the General Plan, and other local and regional plans such as the Regional Plan, and concludes that the proposed project would have the potential to conflict with adopted policies. Implementation of General Plan policies and mitigation measures provided in Section 2.9.5.2 would reduce potential impacts but not to a level below significant.

- L3-4 This comment reiterates SANDAG's support for smart, sustainable growth that reinforces the Regional Plan's principles. Further, this comment suggests utilization of the SANDAG Smart Growth Toolbox and Smart Growth Design Guidelines to focus density within and near unincorporated communities to reduce vehicle miles traveled and to achieve mixed-use transit-oriented development.

The County acknowledges the comment. Refer to response to comment L3-3. Section 2.9.3.2 of the Draft SEIR discusses the proposed project's consistency with the Regional Plan. Specifically, PSR Analysis Areas CD14, DS8, DS24, ME30A, NC3A, NC18A, NC22, NC38+, SD15, VC57+, and VC67, and former CGSP Subareas CG1-8 were determined to be consistent with the Plan because they propose higher density development along the periphery of existing villages and towns. However, the Draft SEIR concludes PSR Analysis Areas BO18+, FB2+, FB17, FB19+, FB21+, ME26, NC37, PP30, VC7+, and VC51 would increase dwelling units in more semi-rural to rural areas, farther from villages and/or higher densities of incorporated cities, and thus would not be consistent with the Regional Plan, resulting in a potentially significant impact (part of overall impact LU-1).

- L3-5 This comment suggest the Regional Plan's principles can be put into practice to meet goals outlined in the County's Climate Action Plan (CAP).

The County acknowledges the comment. The County's CAP was approved on February 14, 2018 and was a separate discretionary action not part of the PSRs GPA. Therefore, no further response is required.

- L3-6 This comment requests any additional environmental documents related to the proposed project be sent to SANDAG for review.

The County acknowledges the comment. The County will continue to coordinate with SANDAG and provide notification of any new environmental documentation or public hearing information. Therefore, no further response is required.