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June 11, 2007

Marilyn Mirrasoul
Environmental Planner
City of San Diego Development Services Center
1222 First Avenue, MS 501
San Diego, CA 92101**RE: COMMENTS ON THE DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT
FOR THE CITY OF SAN DIEGO DRAFT GENERAL PLAN**

Dear Ms. Mirrasoul,

The County of San Diego has received and reviewed the Draft Program Environmental Impact Report (PEIR) for the City of San Diego General Plan Update SCH #2006091032 dated April 26, 2007 and appreciates this opportunity to comment. In response to the Draft PEIR, the County has identified environmental issues that may have a significant affect on the unincorporated lands of San Diego County.

The County is the land use authority for the unincorporated area of San Diego County and our public constituent looks to us to guide reasonable and environmentally sensitive development in our jurisdiction. Staff from the Department of Planning and Land Use (DPLU), Department of Parks and Recreation (DPR), the Department of Public Works (DPW), and Department of General Services (DGS) have reviewed the Draft PEIR and have the following comments regarding the content of the above referenced document:

HOUSING

1. **H-1** Regarding the prospective annexation of Davis Ranch, the 77-acre property located adjacent to Interstate 15, the Draft PEIR on page 3.8-12 states that this land is designated for industrial use, however the current County General Plan Designation is for Public/Semi Public Facilities and the Zoning is A70, Limited Agriculture. The planned land uses for this site under the proposed GP2020 is for Office Professional along the western portion of the site and Village Residential (VR-20) along the eastern portion of the site. Build out of the VR-20 designated areas of this site is planned to be included in the County's Housing Element to count towards the County's Regional Housing Needs Allocation. If the City were to go forward with an annexation of this property, the City would need to take on the affordable unit housing allocation, thus reducing the required affordable housing units that would need to be provided by the County. Legislation is pending to require this (AB 1019).

PROSPECTIVE ANNEXATION AREAS

2. **H-2** Figure 2.2-1 of the Draft PEIR identifies prospective annexation areas including two County islands and two large unincorporated areas of the unincorporated County: 4S Ranch and East Otay Mesa (EOM). It is unclear why annexation of 4S Ranch is being pursued. 4S Ranch was previously within the City of San Diego's Sphere of Influence (SOI) until the owners/developers of 4S Ranch went through the LAFCO procedure to remove the land from the sphere. 4S Ranch was developed through an extensive County planning process, is primarily built out, and services are already provided in this area. For these reasons, the County does not support the prospective annexation of 4S Ranch to the City of San Diego.

H-3 Similarly, annexation of EOM would extend the City's jurisdictional boundary and SOI further east outside of the City's current SOI. The County is currently in the process of updating the EOM Specific Plan. As part of that update, the County has identified necessary improvements to essential public services including roads, sewers, water, fire, and sheriff. These services would be provided in timing with future development, either through project conditions or special districts. Therefore, City annexation of EOM is not necessary to provide urban level services, nor does the annexation appear to promote the logical expansion of City boundaries. For these reasons, annexation of EOM is not supported by the County.

The County looks forward to working with the City and LAFCO to ensure all proposed annexations of unincorporated County land to the City of San Diego occurs in logical and orderly way to ensure effective land use planning and efficient provision of services.

H-1 Comment acknowledged. Should the City move forward with a proposal for annexation, under AB1019 the City of San Diego and the county of San Diego would be authorized to reach a mutually acceptable agreement on a revised determination of regional housing needs to reallocate a portion of the affected county's share of regional housing needs to the City, and report the revision to the council of governments.

H-2-H-3 4S Ranch and East Otay Mesa (EOM) are identified as prospective annexations areas since they would create logical and contiguous extensions of the City given their relative location and reliance on City infrastructure for access to nearby freeways and facilities, and would provide for opportunities for cost-efficient delivery of urban services. The City does not have specific plans to annex these areas at this time. However, property owners within these areas have the ability to initiate such a process. Should the City pursue annexation of these areas, the annexation process and amendment of the City's Sphere of Influence (SOI) would be done in accordance with LAFCO procedures and State law.

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PUBLIC UTILITIES

3. Section 3.4, page 3.14-5 references the Integrated Waste Management Plan, Countywide Siting Element, December 2004. The County's Siting Element was approved in 2005 and is available online at <http://www.sdcdpw.org/siting/>. Also, the document was also not referenced in the list of references at the end of the section.

H-4

LAND USE

4. It is a County priority to maintain the recreational values of the Los Penasquitos Canyon Preserve, San Dieguito River Park, Otay Valley Regional Park, Tijuana River Valley Regional Park, Sycamore Canyon Preserve, Goodan Ranch Open Space Preserve, and Lusardi Creek Open Space Preserve. Please include a discussion of County Parks and Preserves and identify where the GPU would result in growth proximal to these Parks and Preserves. The Draft PEIR should identify that significant project level impacts could occur to County parks and preserves, and should identify feasible mitigation measures that would be available for individual projects to mitigate potential impacts to County parks/preserves.

H-5

5. The County recommends that the Mitigation Framework in Land Use Section 3.8.4 include additional information to recognize that projects located adjacent to County MSCP lands and County Parks and Preserves will require coordination with the County of San Diego to ensure that adverse impacts to these resources do not occur. For example, planned development adjacent to preserved lands in the existing South County of San Diego Multiple Species Conservation Program (MSCP) Subarea should follow the guidelines outlined in Section 1.10 (Land Uses Adjacent to the Preserve) of the adopted South County MSCP Subarea Plan (October 22, 1997) to avoid impacts to Parks and Preserves. In addition, planned development adjacent to proposed Pre-approved Mitigation Areas (PAMA) in the draft North County MSCP Plan area should also follow similar adjacency guidelines as those outlined in the South County MSCP Subarea Plan until the draft North County MSCP is approved.

H-6

6. The County recommends that the Land Use Section 3.8.3, Impact Analysis includes a discussion in regards to the City trail system connecting to the established County trail system. Please reference the County's Trail Program (CTP) and the County's Community Trails Master Plan (CTMP) to identify and address linkages to the existing or proposed multi-use County trail easements and pathways. The mitigation framework section should recognize that future projects with connectivity to existing or proposed County trails or pathways would need to be evaluated and designed to ensure adverse impacts related to the trails or pathways do not occur.

H-7

H-4 The adoption date will be corrected and the Countywide Siting Element will be cited under Notes and References of Section 3.14 Public Utilities.

H-5 The last paragraph of the Recreation Element Section E discussion section will be revised to read: "The City of San Diego, in association with other agencies and jurisdictions, currently has four river parks....." In addition, Policy RE-C.6d was edited to include coordination with the County's trail system.

The PEIR Mitigation Framework within the Land Use Section has been revised to recognize that projects located adjacent to County MSCP lands and County Parks and Preserves would require coordination with the County of San Diego to ensure that adverse impacts to these resources does not occur.

H-6 See response to comment H-5.

H.7 The County Trails Master Plan and Program are referenced in the Land Use Section 3.8.1 under Regulatory Framework. The Land Use Section 3.8.3 of the EIR has been edited to include within the mitigation framework a requirement for the county of San Diego to ensure adverse impacts do not occur adjacent to or within county parks and open space. Improving linkages and connectivity is a major theme in the General Plan for both the urban environment and natural environment. The Conservation Element, Section B, Open Space and Landform Preservation (specifically Policy CE-B.1g) and the Recreation Element, Section C, Accessibility, and Section E, Open Space Lands and Resource-Based Parks, (specifically Policies RE-C.6 and a new Policy RE-E.7) reference open space and park trails. Edits to Policy RE-C.6 have been made to include mention of the county trail systems.

7. **H-8** The Economic Prosperity Element identifies areas planned for the Prime Industrial Lands Overlay (Figure EP-1). The County opposes extension of the prime Industrial Lands Overlay north of Balboa Avenue. The County is opposed to the designation of the Prime Industrial Lands overlay on property located within a minimum of 1000 feet from the entire 19.5-acre County Operations Center Annex (COC Annex) site. The The Polinsky Center, a 9-acre children's residential intake facility, is an existing land use at the COC Annex and there is a possibility of future residential development on the COC Annex site. Based on existing and potential future residential uses at the COC annex site, the designation of the Prime Industrial Lands overlay near the COC annex would create planning conflicts and confusion and would be potentially detrimental to the County's future use of this property. For this reason, the County opposes extension of the prime Industrial Lands Overlay north of Balboa Avenue.

The County of San Diego has solicited proposals from developers interested in redeveloping both the County-owned COC Annex property located at 5201 Ruffin Road, San Diego CA 92123 and the County Operations Center (COC) located at 5555 Overland Avenue, San Diego 92123. A developer, Lowe Enterprises, has been selected and approved by the Board of Supervisors. The first phase of the project, involving the redevelopment of the 35-acre COC, is moving forward at the present time with the next steps in the implementation process scheduled to occur in July, 2007. Preliminary concept plans for the redevelopment of the COC site include the construction of County offices (including the relocation of certain departments to the site as well as parking structures to accommodate the employees currently working at this major County facility.

H-9 A second phase includes a future development concept for the COC Annex site that emphasizes potential residential development. This type of development is needed in the Kearny Mesa area to support a balance of employment and housing opportunities. Until very recently, housing was nearly unavailable in the Kearny Mesa Community Planning area, except for in nearby Serra Mesa. The effort to develop housing by the County would include an application to the City of San Diego for an amendment to the Kearny Mesa Community Plan to revise the zoning from IL-2 with allowable institutional uses to a zone that is appropriate for mixed use development including residential.

TRAFFIC AND TRANSPORTATION

8. **H-10** The Draft PEIR is a program-level document that does not provide specific mitigation measures to reduce and/or eliminate the project's significant traffic impacts. Subsequently, significant unavoidable impacts related to transportation, traffic, and circulation remain. The City is encouraged to coordinate with the

H-8 – H-9 These comments do not specifically address the adequacy of the Draft PEIR, but will be included in the record of public comment for the General Plan.

H-10 - H-16 The City agrees that when analyzing traffic impacts, boundaries should not occur between local jurisdictions. Traffic impacts are analyzed to a point of significance regardless of the jurisdiction in which the impacts occur. The City will continue to coordinate with the county if development impacts occur on the county roadway system and as roadway, bikeway, and transit routes are modified in adjacent areas to the county.

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County to address significant project-specific traffic impacts either as part of the General Plan update or individual development projects that result in impacts to the County's roadway network.

9. **H-11** Coordination with County staff is recommended as each portion of the General Plan update is developed to ensure continuity and consistency between the City and County General Plans. Specifically, coordination with County staff is recommended to ensure consistency in the classification/design of Circulation Element roads, bicycle network corridors, and transit routes that traverse both jurisdictions.
10. **H-12** Future projects approved under the City's General Plan may have potentially significant traffic impacts to County roads. The Draft PEIR should recognize the potential traffic impacts to County roads and recognize that impacts would be mitigated through the identification of project specific mitigation identified through site specific traffic analysis. To ensure that potential impacts to County roads are identified for future City projects, it is recommended that the City coordinate with the County and require the following analysis in project level traffic studies for projects that could affect County roads:
- H-13** > Identify the differences in projected LOS on County's Circulation Element roadway facilities as a result of the project. The LOS assessment of County roadway facilities should be based on the County's Public Road Standards criteria.
 - H-14** > The County's Guidelines for Determining Significance for Traffic and Transportation should be used as a guide in the preparation of the traffic analysis (<http://www.sdcounty.ca.gov/dplu/Resource/3-procguid/3-procguid.html#trans>) for impacts to County roads. If an alternate method is used, it must be in conformance with the requirements of CEQA (see section 15130 of the State CEQA Guidelines).
 - H-15** > CMP/SANTEC guidelines state that the project study area should extend to include road segments and intersections that receive 50 or more peak hour trips from the proposed project. County guidelines further recommend extending the scope of analysis to 25 peak hour trips for roadways currently operating at LOS E/F.
 - H-16** > Any proposed changes to the City's Circulation Element Plan (deletions, reclassifications, and alignment) should be identified and the analysis should identify if circulation changes would impact the County's Circulation Element roadway network. Several existing and planned roads traverse both the City and County's jurisdiction.

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The County of San Diego appreciates the opportunity to continue to participate in the environmental review process for this project. We look forward to receiving and future environmental documents related to this project or providing additional assistance at your request. If you have any questions regarding these comments, please contact Jennifer Campos at (858) 495-5204.

Sincerely,

Handwritten signature of Eric Gibson in cursive, followed by the word "chief" written in a smaller, simpler font.

ERIC GIBSON, Interim Director
Department of Planning and Land Use

cc: Vince Nicoletti, CAO Staff Officer, DCAO, M.S. 6
Michael Ott, Executive Officer, LAFCO, M.S. A216
John Kross, Deputy Director, General Services, M.S. 0200
Trish Boaz, Chief, County Department of Parks and Recreation, MS O29
Eric Brennecke, Project Manager, Department of Public Works, MS O336
Priscilla Jaszowski, Administrative Secretary, Department of Planning and
Land Use, M.S. 0650



SAN DIEGO COUNTY OFFICE OF EDUCATION

6401 LINDA VISTA ROAD, SAN DIEGO, CALIFORNIA 92111-7399 (858) 292-3500

Superintendent of Schools
 Randolph E. Ward, Ed D

May 10, 2007

Marilyn Mirrasoul
 Environmental Planner
 City of San Diego Development Services Center
 1222 First Avenue, MS 501
 San Diego, CA 92101

Dear Ms. Mirrasoul:

Subject: City of San Diego Draft General Plan
 Project No. 104495, SCH No. 2006091032

The San Diego County Office of Education (SDCOE) is in receipt of the draft Program Environmental Impact Report (PEIR) for The City of San Diego Draft General Plan. This letter constitutes our response to the notice.

I-1 The SDCOE provides a variety of school and educational services to City and County residents. Unlike local school districts, the SDCOE provides its services throughout the County, making it the equivalent of a countywide school district. As a result, the SDCOE is affected by growth and development wherever they occur in the City and County.

Some SDCOE programs provide direct services to students, including children (infants, pre-school, and students in grades K-12) as well as adults. Other SDCOE services are provided through public schools, including all forty-three school districts and all five community college districts in the City and County. These services include staff development for teachers and current and prospective administrators, as well as numerous management support services. The following SDCOE programs may be affected by the General Plan:

- Juvenile Court & Community Schools
- Regional Occupation Program
- Hope Infant Handicapped Program
- Migrant Education Program
- Outdoor Education Program
- Teacher Training and Development
- Administration Training and Development
- SDCOE Administration

As stated in the Impact Analysis of Section 3.13 (Public Services and Facilities) of the draft PEIR, "The construction of additional housing units and the increase in population . . . over time will impact various public services and facilities." ". . . schools . . . may also experience deficiencies." The PEIR further acknowledges existing infrastructure deficiencies to be remedied, and new or expanded facilities being required to maintain adequate service levels.

Board of Education

Nick Aguilar Susan Hartley Sharon C. Jones Robert J. Watkins John Witt

SERVICE AND LEADERSHIP

I-1: Comment acknowledged. The City of San Diego endeavors to coordinate with adjacent jurisdictions and provides project environmental documents to educational facilities which may be impacted by proposed development. The General Plan includes multiple policies that address the importance of educational facilities and services in the City of San Diego including Policy LU-H.1c which calls for the City to "Recognize the important role that schools play in neighborhood life and look for opportunities to form closer partnerships among local schools, residents, neighborhood groups, and the City with the goal of improving public education."

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Letter to Marilyn Iriasou
Re: Subject: City of San Diego Draft General Plan / Project No. 104495, SCH No. 2006091032
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We look forward to working with the City to reduce or fully mitigate impacts to SDCOE and school facilities and services in creative and mutually beneficial ways when possible. If you have any questions regarding this correspondence, please feel free to contact me at (858) 292-3680.

Sincerely,



Robert W. Nicholson
Senior Director
School Facilities Planning Services

BN:DRP

cc: Bryan Ehm, Facilities Planning Coordinator
Dana Perrin, Program Business Specialist