

## **GP 2020 EIR MEMO**

**To:** Bruce Graves; PAC

**From:** Tom Burton

**Date:** July 25, 2009

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Following on our phone call of yesterday, and one with Cecelia Borland this afternoon, I'll share my thoughts about: A. How to approach the thousands of pages and myriad concepts in the documents provided by the County; B. Some specific Palomar Related inconsistencies in the documents; C. Why all this is BOTH important, and doesn't matter at all (!!); with a final: D. Conclusion.

### **A. APPROACH**

To put you at ease, even for a professional, the whole disk full of documents is daunting. I can't imagine ANYONE really reading it all.

The easy way to access it is via a "FIND" feature at the top of the margin of the open page. I'm explaining this now, as I just learned that Cecelia didn't know about it—so I'm thinking that others too may be assisted by knowing this.

I'm assuming that you're accessing the documents via a disk in a computer, by the way. And with the disk in, go to the INDEX page. Then 'click' on any section you wish to read (or the section references I offer below). Then in the "FIND" box, insert: "Palomar Mountain" and 'click' ENTER and it will search the entire document you have open for EVERY referenced to Palomar—even the MAPS when they have Palomar on them. This is the technique I used to get thru the thousands of pages in a mere 6 hours. There are 'buttons' next to the "FIND" box that will move you forward and backward by 'clicking' on them.

You do have to search document section by section—you can't start at the beginning and insert Palomar Mountain once and expect the machine to do it all for you.

In addition to this, you will find a number of sections of the EIR that you THINK would be very significant to us on the Mountain, but in which there are NO REFERENCES to Palomar. An example of this is Chapter 2.12 on POPULATION AND HOUSING—no reference to Palomar there.

In these areas (subjectively important to any individual Committee member/reader) I suggest a scanning through of the Chapter to get the 'feel' of

what it's about and then THINK—why is there no Palomar reference (we have houses and people, for example)...

## **B. PALOMAR SPECIFICS**

In this section I'll just start at the beginning and go through, first, the whole EIR, and then all the Appendices, in order, saying only things that stood out to me. Others might have different ideas, or by using the approach outlined above, have different 'hot buttons.'

### **CHAPTER 1:**

At page 1-41 you will find statistics both wrong, and inconsistent with statistics found at Appendix F. Since this is the first example, I'll 'flesh' this out, but won't do so for the whole memo, allowing each of you to do your own work.

Table 1-1 should be highlighted to show the Palomar Mountain line, if you accessed it using the 'approach' I suggested. As you read across the line, you find a column for "Public/Semi-Public Facilities" there it shows 120 Acres. Well, those of us who have been around the Mountain for any number of years would know that the Observatory (a Public facility??) alone is more than that—not to mention the Christian Conference Center; Yoga Retreat Center; Girl Scout Camp; the various Federal and State Campsites...something is wrong there.

Continuing on with the table, under the column labeled "Open Space" it shows 116 acres. My property alone has about 60 acres of dedicated Open Space Easements. I know the Upper Meadow Subdivision next to the Yoga Retreat has all except for designated house pads as dedicated Open Space. The project up Conifer Road also has lots of dedicated open space—so this number can't be correct.

### **CHAPTER 2.1**

Table 2.1-3 has incorrect acreages also.

### **CHAPTER 2.2**

Table 2.4-1 Shows over 11,000 Acres on the Mtn as Ag Preserves but only over 3,500 as Williamson Act Contracts (which is what it takes to have an Ag Preserve—unless there were some grandfathered ones??) so, another inconsistency.

There is much very interesting material in this section—especially for our ranchers. San Diego is amazing as the 12<sup>th</sup> largest agricultural county in the country and the 6<sup>th</sup> largest urban population in the nation—gives one some appreciation for the scope and meaning of a General Plan for ALL THAT! Agriculture is the 5<sup>th</sup> largest segment of San Diego's economy—huge stuff. We have the MOST Organic Farms in any county in the country. The majority of farms (representing all this mass scale, above) are LESS

than 10 Acres in size—so all this is accomplished NOT by huge corporate mega farmers, but by the little guy—our neighbors.

Though only maps are revealed by the search approach I've suggested, in this Chapter, one might wish to look at pages: 2.2-15 about conversion to commercial; and the top of the following page on impact of densities and conversions to residential. [There is a point to be made, from a high level point of view, that more, smaller parcels helps SD agriculture. Small ranch/farms with the right product mix might be good for us. ] Also pages 2.2-17 and 18 regarding open space; and 2.2.3.2 on renewal of Williamson Act contracts.

CHAPTER 2.3 Nothing on Palomar

CHAPTER 2.4 Some references but largely habitat impacts, which we all know about.

CHAPTER 2.5 Nothing on Palomar

CHAPTER 2.6 Maps and fault indications, again we all know about this.

CHAPTER 2.7

At page 2.7-37 there is a reference to a Burn Dump Site—don't know what this is as we don't have a dump. Also Table 2.7-9 shows Wildland Urban Interface fire threat showing 18,000 some acres in this category—I think we'd say it's the WHOLE MOUNTAIN! And these, stats were from 2004—when we've had fires, a major one in 2007—why don't they get current??

CHAPTER 2.8 Lots of references and interesting stuff, but we all know it and not important in terms of the work we're doing on the GP.

CHAPTER 2.9

At page 2.9-13 they refer to Palomar as a "...distinctive neighborhood..." not the Country Town that we've been emphasizing since 1997 in our discussions with them. They also say that: "...further commercial is not expected..." This belies the fact that it can't happen if they don't allow it. It is also contradicted by Public Services statistics at Table 2.13-6. We all want to protect the Observatory, but limited residential development (per pre-FCI densities and all the other setbacks and other regulations already in place—along with dark sky requirements in building permits) still should allow Palomar property owners the right to develop residences.

CHAPTER 2.10 Nothing on Palomar

CHAPTER 2.11 Nothing on Palomar (Noise—motorcycles!!)

CHAPTER 2.12 Nothing on Palomar

## CHAPTER 2.13

There is a paragraph on CSA 110. There are also indications that there is a 115% increase in population and housing on this Mountain—obviously a disconnect between police service folks and the rest of the world. See chart at page 2.13-42.

CHAPTER 2.14 Stuff on State Park and USFS maps, but we all know this.

CHAPTER 2.15 Nothing on Palomar (with no increase in roads or public transportation how can there be much change—EXACTLY what the majority of us want).

CHAPTER 2.16 Nothing on Palomar

CHAPTER 2.17 Nothing on Palomar

CHAPTER 3 Nothing on Palomar

## CHAPTER 4

It's important to understand the Project alternatives as they are the basis of all the EIR studies—everything is based on ASSUMPTIONS made in the Project Alternatives.

All of the Project Alternatives (except “No Project” meaning keep things the same—which generally represents the view the majority of the Mtn folk) have density assumptions that don't track with our RETURN TO STATUS QUO, or pre FCI desires.

There is a paragraph at page 4-4 on Back Country Development Alternative that we should distinguish (lawyer talk for counter with our own interpretation of facts and philosophy) as it prevents the tourist and resident serving commercial accommodations that I believe the majority of folks would like to see on the Mtn.

CHAPTER 5 Nothing on Palomar

CHAPTER 6 Nothing

CHAPTER 7 Nothing

## APPENDIX A

This shows who has written them and the only one listed from Palomar is Scott Kardel on behalf of the Observatory—NO PMPO letters referenced!

APPENDIX B Nothing

APPENDIX C I didn't know about the Laguna Mtn Skipper an invertebrate, other wise

Nothing of significance.

#### APPENDIX D

Ground Water is a big deal for most of us up here. Largely the data provided was from the Yoga Center and Christian Conference Center (does the PMPO have their data too? If not it's all in the EIR). However, there's nothing in here about water export (Yale and other SUP related efforts of the PMPO over the years).

At Table 3-8 there's some data on the Pal Mtn Mutual Water Co that doesn't seem correct to me: it shows 196 connections, but only 70 people served. I also didn't find out what "NE" meant for demand in the table.

#### APPENDIX E Nothing

#### APPENDIX F

Again in the chart there are number inaccuracies: we all know there's more than 6 Acres of Open Space here; More than 2 Acres of Public and Semi-Public Facilities; and more than 14 Acres of National Forest and State Park.

APPENDIX G Nothing on Palomar—but we've taken the position in the past we want to keep the roads the same.

APPENDICES H, I, J, K: All nothing on Palomar.

#### APPENDIX L

There is a reference to a Palomar parcel at the foot of the South Grade that I'd like Bonnie Phelps to look at, can be found by the 'approach' referenced at first, I believe on page 430. I wonder who the owner is and why the density and parcel sizes would be different (more liberal) than our pre-FCI approach.

#### APPENDIX M

At the chart on page 9 there are multiple references to the Mtn and density changes that are called 'sweeping' – but are far less 'liberal' than the return to pre-FCI that our property rights rationale would request. Something we should also counter, to stand any chance of having our requests fulfilled.

### **C. IMPORTANT? / NOT!**

As Mountain property owners, we CARE about all this—and it represents at least 12 years of work and untold millions of dollars of our tax monies. But as cited above, lots of what is in the EIR about our Mountain is wrong. If we're 'value' based individuals like investors, we care. But if we understand where this EIR work fits into the General

Plan, we probably don't care. Here's how that works: We care about what impacts us and our property and our personal needs. The rest we may have an intellectual interest in, but don't get too concerned. The EIR has been constructed to meet a legal requirement (to study environmental impacts of proposals) and to JUSTIFY whatever assumptions the County puts forward. So, the EIR can be read to allow anything THEY have proposed. What we care about is what WE WANT FOR PALOMAR. The question then becomes, does it allow whatever we would request of the County? The answer is largely YES. But the 'largely' word is in there as the inaccurate statistics referenced above cloud matters, and the DENSITY and POPULATION statistics of the Police services area do not meet our needs, or justify what I believe the PMPO density request to be.

#### **D. CONCLUSION**

During the time PMPO has been involved with the County on the GP2020 project we have developed good working relations and impact way beyond the votes, population, tax dollars or property area we represent (in my opinion) based on these factors: we have been kindly/respectfully interactive; timely; relevant and, to the extent possible for non-planning professionals, we have spoken in their vernacular.

Even though we have different opinions, and strong ones at that, to the extent we can continue in that vein, everyone wins—and we stand the best (if any) chance of impacting the ultimate General Plan (and the Zoning which will later flow from it).

This is the reason I believe that the PMPO *should* reply to the EIR, even though, as referenced above, it won't make much difference in the short run.