

**ANNE S. FEGE, PH.D., M.B.A.**  
12934 TEXANA STREET  
SAN DIEGO, CA 92129-3620  
PHONE 858-472-1293, EMAIL [AFEGE@AOL.COM](mailto:AFEGE@AOL.COM)

August 31, 2009

Mr. Devon Muto  
Department of Planning and Land Use  
5201 Ruffin Rd., Suite B  
San Diego, CA 92123

**RE: Comments on Draft Environmental Impact Report for General Plan**

Dear Mr. Muto,

Thank you for the opportunity to provide comments on this Draft Environmental Impact Report (DEIR) on the General Plan for San Diego County. It reflects well the complex issues affecting how we live together in San Diego. This letter focuses on and requests revisions relating to wildfire safety and climate change impacts, in both the DEIR and the draft General Plan. My comments overlap with but are not identical to those of the California Native Plant Society, San Diego Chapter.

**1. Strengthen wildfire safety provisions in the Safety Element, Fire Hazards section.**

Chapter 2.7 of the DEIR includes a reasonable description of the impacts associated with wildfires, and changes in County policies through the General Plan. The Mitigation Measures are reasonable, but are difficult to trace to specific provisions in the draft General Plan.

Section 2.7.6.8 lists Infeasible Mitigation Measures that should be considered rather than discarded:

- Require development guidelines and reduce planned densities (items 1 and 2) in areas that have extremely high fire risks, rather than knowingly putting future County residents at risk of wildfire losses of life and property.

The policy in S-1.1 is strong and valued, yet is not carried through, in the Land Use Element or in the Safety policies (specifically S-3). The DEIR proposes mitigation (Haz-4.1) to “[i]dentify and minimize potential fire hazards for future development... locating development away from Fire Hazard areas whenever practicable” Yet density increases in the Draft Map are identified in the Very High Hazard areas.

**S-1.1 Land Use Designations.** Minimize the population exposed to hazards by assigning land use designations and density allowances that reflect site specific constraints and hazards.

In the DEIR, section 2.7.4.8 Issue 8: Wildland Fires states that “Implementation of the proposed General Plan Update would result in land uses that allow residential, commercial and industrial development in areas that are prone to wildland fires.,,, [and] would result in a potentially significant impact from the exposure of people or structures to a significant risk or loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residents are intermixed with wildlands.” This is unacceptable for the citizens of San Diego County.

It is acknowledged that the July 1, 2009 draft of the General Plan incorporated a number of revisions from the previous version, including:

- Section S-3.5 was modified to require development to provide additional access (assumed to be the same as “secondary access”).
- Fuel is written in several policies and definitions to include all structural elements, man-made combustible materials, ancillary structures, ornamental and natural vegetation.
- Revision of glossary definitions, including “Very High Hazard Areas” (to be consistent with California Department of Forestry and Fire Protection), and “Fuel Modification Area”

In the “context” section, the recitation of structural losses is unnecessary; if this section is retained, there should also be discussion of the natural vegetation burned in those wildfires, the acreage that has type-converted to invasive, flammable grasses over the past decades, and more. In that same section, the statement about wildland fire control being the responsibility the state and Federal agencies is misleading. These responsibilities are more accurately stated in the issue of “Multiple Fire Protection Districts.”

Goal S-3 Minimized Fire Hazards should clearly state that development should be avoided in high risk areas, and include this policy:

**S.3.x Avoid risk to life and property. Avoid development or reduce its intensity in Very High Hazard Zones.**

For S-3.2, development should be greatly curtailed on high-risk sites, rather than knowingly putting future County residents at risk of wildfire losses of life and property, and should read:

**S-3.2 Development in Hillside and Canyons.** ~~Require~~ Limit development located near ridgelines, top of slopes, saddles, or other areas where the terrain or topography affect its susceptibility to wildfires, and ~~located and designed to account for topography~~ locate and design any developments with maximum ignition-resistant construction to reduce the increased risk from fires. (Note that underlined text indicates additions, and overstrikes suggest deletions.)

For S-3.6 Fire Protection Measures, there are two columns and these should be combined.

In section S-3.7, a policy was added that clearly requires ignition-resistant construction for all new, remodeled, or rebuilt structures. It is still essential that the County address the structures in Very High Hazard Areas, and that the policy also include the following:

**S-3.7. Fire resistant construction.** Add: Establish and enforce reasonable and prudent standards that require retrofitting of existing structures in Very High Fire Hazard areas.

San Diego County Draft EIR for General Plan, Comments from Anne S. Fege, Aug. 31, 2009, p. 3  
Section S-4 provides greater clarification for the difference between wildland fuel modification and that of defensible space around structures. Some changes were made in S-4.1, and one further revision is requested:

**S-4.1 Fuel Management Programs.** Support programs consistent with state law that require fuel management/modification within established defensible space boundaries and when strategic fuel modification is necessary outside of defensible space, ~~balance fuel management needs with the preservation of native vegetation.~~ balancing protection of structures with preservation of sensitive habitats and native vegetation.

For S-4.2, the following change is requested:

**S-4.2 Coordination to Minimize Fuel Management Impacts.** ~~Solicit~~ Incorporate comments from CAL FIRE and wildlife agencies for recommendations regarding mitigation for impacts to habitat and species into fuel management projects.

Interestingly, the Vegetation Management Report, approved by the County Board of Supervisors in March, 2009, does not mention or suggest that any report findings be applied to the General Plan, and neither the draft General Plan nor the DEIR mention the Vegetation Management Report.

Since there is no mention of “shelter-in-place” or similar concepts, it is assumed that the County will not approve developments that request this consideration in lieu of secondary access and other requirements that reduce life and property risks from wildfires. The County’s policies should ensure that a project should not be built, if it is unsafe for residents to prepare for and evacuate from a wildfire.

## **2. Strengthen descriptions of impacts, mitigation, and adaptation from climate change**

The impacts of regional and local drought are understated in the DEIR and mitigation is inadequate. The DEIR includes a short but thorough outline of expected impacts of wildfires from climate change, in section 2.17.3.2; however, mitigation measures are not provided. Specific comments, on water supplies and greenhouse gases (GHG) related to climate change, are provided below.

**Water supplies.** If extended droughts result from climate changes over the decades ahead, the General Plan policies and provisions for development may have a significant impact on water supply. The DEIR does not adequately address the significant effect that any project will have if there are insufficient water supplies available to serve the project from existing entitlements and resources. Recent research and analysis has clearly established that these entitlements are likely to be reduced by climate changes that affect drought conditions in the Colorado River basin, snowpack in the Sierra Nevada mountains, and ultimately allocations to the San Diego County Water Authority. The DEIR does not address the likelihood of the actual (not promised or allocated) delivery of future water supplies, since allocations will be unreliable and unpredictable if climate change reduces overall availability of water transfers in California. The DEIR also does not adequately address the cumulative impacts on continuing to withdraw and overdraw groundwater.

**GHG emissions.** These emissions are significant environmental impacts that must be mitigated. In order to show that the proposed new development is consistent with California’s plans to

San Diego County Draft EIR for General Plan, Comments from Anne S. Fege, Aug. 31, 2009, p. 4 stabilize GHG emissions (AB 32 and other laws and policies), the DEIR must demonstrate that policies and actions would result in a 30 percent reduction in emissions by 2020, and that they will not compromise the long-range goal of reducing GHG emission 80 percent below 1990 levels by 2050. Yet Section 2.17.7.1 Issue 1 (Compliance with AB 32) acknowledges that the projected GHG emissions will increase 24 percent over 2006 levels, and 36 percent increase from estimated 1990 levels. It further states that “the proposed project would result in a potentially significant impact related to compliance with AB 32” and that “the proposed General Plan Update policies and mitigation measures would reduce direct and cumulative impacts related to compliance with AB 32.” It is the obligation of the County to meet these levels through the General Plan policies and other actions, not rely on State or Federal outcomes.

The few General Plan policies identified in Chapter 2.17.6 of the DEIR, are a modest start. As the policies and actions to reduce GHG emissions are not yet formulated and would be detailed in a “GHG Reduction Climate Change Action Plan,” the long list of possible mitigations (CC-1.1 through CC-1.18) is impressive but inconsequential. Appendix G of the DEIR, prepared by the University of San Diego, includes an emissions inventory and suggested implementation strategies that are an important start, but are not analyzed or carried into the Draft General Plan. The County needs to identify and incorporate additional policies to reduce GHG emissions and confirm to state requirements.

The conclusions in Chapter 2.17.7.2 state, “The proposed General Plan policies and mitigation measures discussed above, in addition to [other ordinances] would mitigate the potential direct and cumulative impacts of global climate change.” Yet the General Plan and the DEIR assume and support car-vehicle-based transportation, leading to a great inconsistency between goals of reducing GHG and continuing current transportation policies and patterns. As long as there are no transit improvements incorporated into the General Plan policies and the County’s actions, the GHG emission reductions will not be met.

### **3. State policies affirmatively**

Although some changes were made since the November, 2008 draft, many policies are still stated vaguely and tentatively, rather than stated as commitments to accomplish the objectives. It is important to replace “may” and “will” with “must” and “should,” and to replace “balance,” “encourage,” “promote,” and similar verbs with active, affirmative verbs such as protect, enhance, restore, remove, preserve, and prohibit. Some changes have been made and are acknowledged, such as (*italics added*):

**LU 6.1 Environmental Sustainability.** *Require the protection of intact or sensitive natural resources and the long-term sustainability of the natural environment.*

**LU 8.3 Groundwater-Dependent Habitat.** *Prohibit development that would draw down the groundwater table to the detriment of groundwater-dependent habitat.*

Definition of Sustainable (in glossary), to be consistent with the United Nations World Commission on Environment and Development.

In addition, the DEIR identifies hundreds of policies and measures to mitigate significant impacts, but do not include measurable and enforceable performance standards.

San Diego County Draft EIR for General Plan, Comments from Anne S. Fege, Aug. 31, 2009, p. 5

Thank you for this opportunity to comment and to contribute to the sustainability of our lives together, as citizens of the County of San Diego.

Sincerely,

A handwritten signature in black ink that reads "Anne S. Fege". The signature is written in a cursive, flowing style.

Anne S. Fege, Ph.D., M.B.A.  
Retired Forest Supervisor, Cleveland National Forest  
Botany Research Associate, San Diego Natural History Museum  
Adjunct Professor, Department of Biology, San Diego State University

cc: Jeff Murphy, Tom Oberbauer, Ralph Steinhoff, Ken Miller, and Chandra Waller-County of San Diego