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**Subject:** Land Use Policy 1.2 and associated General Plan issues

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**To:** Eric Lardy <[Eric.Lardy@sdcounty.ca.gov](mailto:Eric.Lardy@sdcounty.ca.gov)>

Dear Eric:

Thank you for holding the recent workshops on LU 12. I would like to circulate some thoughts in writing, as I was not able to attend the Board hearing on March 4 that addressed this topic.

Let us all recognize that County and its General Plan face a crisis. In EHL view, though, the crisis is not LU 1.2 *per se* but rather current and future GPAs requests that, if adopted, would surely *dismantle* the central achievement of the Update - the planning framework of towns, villages, and rural greenbelts. This framework was adopted to save San Diego's precious countryside, to meet the County's fair share of regional population growth, and to provide for orderly and focused growth. In this context, we commend Planning and Development Services for initiating a dialogue on LU 1.2 and for the Board action on March 4 to develop *options* for open and full public consideration.

At the workshop I attended, various community members appropriately reminded us that that Update's land use map is *itself* a legitimate smart growth outcome, and that the real question here is whether that outcome will be undermined or strengthened. In EHL's view, the outcome – the result of 13 years of stakeholder and community consensus-building – is well worth defending. Particularly given the Update's robust housing capacity, no rationale has been put forth that this framework is now, a few years later, inadequate or is in need of fixing. And to draw the life out of the designated but incipient rural villages with discontinuous suburban development would be counterproductive.

Also, in EHL's view, the plain language of LU 1.2 takes us in the direction of *preserving* the Update's growth framework. It is a *prohibition* on leapfrog, along with limited *exceptions*. The Board purposely put a "high bar" in place for exceptions, and while we fully understand and respect that the Board wishes reconsider the *degree* of discretion involved, there is certainly no

reason to lower this bar to the ground. Also, as a legal matter, we do not believe that the LEED-ND equivalency standard can be interpreted broadly. Amendment to LU 1.2 would, of course, require CEQA review.

With all this in mind, the direction that Department had been taking – to explore if an “equivalent” standard that better fits the unincorporated area can be formulated – makes good sense. However, the danger in the draft matrix distributed at the workshop is that it could allow typical and disruptive suburban sprawl to be cloaked with planning bromides and to meet a very accommodating locational test - merely 1/2 mile from a circulation element road. Rather, if equivalent standards are developed, these should have an *organic* relationship to the town-village-rural greenbelt system and account for location, scale, design, underlying land use designation (Rural vs Semi-Rural), GHG emissions, and VMT.

In conclusion, as the logical first step, we *support* the Board action to develop and consider "big picture" options. Given the huge implications of this endeavor, EHL urges that a consensus-building process that involves stakeholders and communities accompany decision-making. EHL looks forward to remaining engaged.

Yours truly,  
Dan

cc: Interested parties

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