



10700 Borrego Valley Road  
Suite 1200  
P.O. Box 3302  
Borrego Springs, CA 92004  
Phone: (760) 737-0211  
Fax: (760) 737-0212

Comment Letter 04

February 12, 2018

Kevin Johnston: Land Use/Environmental Planner  
County of San Diego  
Planning and Development Services  
5510 Overland Avenue, Suite 310  
Sand Diego Ca. 92123

Project Name: Property Specific Requests General Plan Amendment  
Project Numbers: PSD 2012-3800-12-005; PDS2014-REZ-14-006  
Env. Review Number: PDS2012-ER-12-00-003

Dear Mr. Johnston:

04-1

Anza Borrego Foundation (ABF) has reviewed the proposed project (PSR DS24) wishes to comment on the rezone of 169 acres near the intersection of Borrego Springs Road and Country Club Road in the Community of Borrego Springs. However the Foundation would like to offer our opposition to the project (DS24) due to a number of planning and environmental issues.

Specifically the issues that concern us include:

**1) Environmental Issues:**

04-2

a. The groundwater basin providing water to the community is in a known overdraft condition. Additional demand on the aquifer will result in adverse impacts.

04-3

b. The project is in a known flood zone from Tubb Canyon. In the past a dike had been constructed across the outfall of the Canyon which diverted flood flow to the southeast and away from the project. However in a recent 2015 flood event this dike has been breached and now flood flows are flowing to the east within the normal stream pattern on the alluvial fan. This project lies directly in the path of future flood flows from the canyon

04-4

c. The proposed site is composed of a very rare and unique Old Growth Ocotillo Forest and provides substantial and irreplaceable biological and aesthetic resources.

04-5

d. The project is composed of mature landform with stable soils and biological resources. This landform is thousands of years old. It is well known that grading of such landforms creates significant erosion potential, including dust and sediment transport issues. These impacts would affect the entire Borrego Springs Community.

04-6

e. Visual impacts. This area of the Community is currently not visually impacted and the grading and construction of hundreds of homes would not be compatible with the local community.

2) Planning Issues:

04-7

a. Currently the vast number of approved and legal lots within the community are unbuilt and vacant. It is likely that greater than 90% of all legal lots are unbuilt. The concept that we are moving forward to create hundreds of more residential lots make no sense, especially since the community has existing legal lots that would provide for available growth into the next century.

04-8

b. The County of San Diego has completed a General Plan that updated the development envelope for future development within the Community. This concentrated future development and density within the core of the town and then decreased density further from the town center. The proposed rezone from 1 dwelling unit per 10 acres to 1 dwelling unit per acre breaks with this acceptable and proven plan.

04-9

As a result of these issues Anza Borrego Foundation does not support the proposed project to rezone the 169 acres as identified within PSR DS24.

Sincerely



Sara D. Husby  
Executive Director

## Responses to Letter O4, Anza Borrego Foundation

O4-1 This comment provides a brief introduction to the letter, and states the commenter's opposition to the proposed changes for PSR Analysis Area DS24 due to environmental and planning issues outlined in the subsequent comments.

The comment does not raise issues regarding the SEIR analysis; therefore, no further response is required.

O4-2 This comment states that the groundwater basin that provides water to the community is in overdraft condition and that additional demand on the aquifer will result in adverse impacts.

Section 2.16.3.4 of the Draft SEIR provides analysis on the topic of Adequate Water Supplies. The comment does not raise issues regarding the SEIR analysis; therefore, no further response is required.

O4-3 This comment states that the Analysis Area DS24 site is in a known flood zone from Tubb Canyon and that flooding in 2015 resulted in the failure of a dike west of the project site.

The County was aware of the failure to the offsite dike (though it is not maintained by the County, nor is it within County property or a County easement, as ABF is likely already aware). Chapter 2.8 analyzes impacts associated with Hydrology and Water Quality, including the topic of Flooding and Housing within a 100-year Flood Hazard Area. The comment does not raise issues regarding the SEIR analysis; therefore, no further response is required.

O4-4 This comment states that the Analysis Area DS24 site is composed of a very rare and unique old growth ocotillo forests and provides irreplaceable biological and aesthetic resources.

This comment is consistent with the findings of the Draft SEIR, which states that PSR Analysis Area DS24 is located within the Ocotillo Forest Resource Conservation Area (Section 2.1.1.1) of the Borrego Springs Community Plan. Chapter 2.1 analyzes impacts to aesthetics and Chapter 2.4 analyzes impacts to biological resources. The comment does not raise issues regarding the SEIR analysis; therefore, no further response is required.

O4-5 This comment states that PSR Analysis Area DS24 is composed of a mature landform that is thousands of years old with stable soils and biological resources. Grading of this site would create significant erosion potential, which would affect the entire Borrego Springs community.

Chapter 2.6 analyzes impacts associated with Geology and Soils, including the topic of Soil Erosion and Top Soil Loss. Chapter 2.3 analyzes impacts associated with Air Quality. The comment does not raise issues regarding the SEIR analysis; therefore, no further response is required.

O4-6 This comment states that the area of PSR Analysis Area DS24 is currently not visually impacted, and construction and grading for hundreds of homes would not be compatible with the local community.

Chapter 2.1 analyzes impacts associated with Aesthetics, including the topic of Visual Character or Quality. The comment does not raise issues regarding the SEIR analysis; therefore, no further response is required.

- O4-7 This comment states that there are already a vast number of approved and legal lots within the community that are unbuilt and vacant and that, because the community already has enough existing legal lots to accommodate growth, creating hundreds of additional residential lots makes no sense.

This was a factor that led to the staff conclusion that the Proposed Project map for DS24 would be inconsistent with General Plan Policy LU-2.3 and COS-14.1, as discussed in Chapter 2.9-Land Use. The comment does not raise issues regarding the SEIR analysis; therefore, no further response is required.

- O4-8 The comment states that the proposed rezoning from 1 dwelling unit per 10 acres to 1 dwelling unit per acre breaks with the approved GPU.

Staff has concluded that the Proposed Project Map for DS24 would be inconsistent with multiple General Plan policies, as discussed in Chapter 2.9-Land Use. The comment does not raise issues regarding the SEIR analysis; therefore, no further response is required.

- O4-9 This comment provides conclusory remarks that reiterate the Anza Borrego Foundation's opposition to rezoning the 169 acres within PSR Analysis Area DS24.

Comment noted. The comment does not raise issues regarding the SEIR analysis; therefore, no further response is required.