COMMENTS RESPONSES

BONSALL COMMUNITY SPONSOR GROUP

Dedicated to enhancing and preserving a rural lifestyle



January 30, 2017

County of San Diego Planning and Development Services 5510 Overland Avenue, Suite 310 San Diego, CA 92123

Via E Mail: Michelle Chan <u>michelle.chan@sdcountyu.ca.gov</u> Donna Beddow donna.beddow@sdcounty.ca.gov

RE: Valiano Specific Plan: PDS2013-SP-13-0012, PDS2013-GPA-13-001, PDS2013-REZ-13001, PDS2013-TM-5575, PDS2013-STP-003, PDS2014-MUP-14-019, LOG NOPDS2013-ER-13-08-002

Thank you for the opportunity to submit comments regarding the proposed Valiano Project on behalf of the Bonsall Community Sponsor Group. We are very concerned that once again developers are trying to use the General Plan Amendment process to exceed the density of a community plan in the County. While this project exceeds the 239 acres in question from the approved density to high density to accommodate 326 homes a major concern of ours is that these newly submitted projects that are growth inducing in changing A70 and RS with minimum lot sizes of 1 to 2 acres into small cities.

It appears that with all the projects submitted to the County that require General Plan Amendments in semi-rural areas of the County projects have their own wastewater treatment plant included in the plan as they are rural by nature and sewer is not available. After talking to LAFCO we were told that this project is within the sphere of influence of the City of Escondido and that this this project could be annexed into Escondido for sewer service removing more agriculture land from the County into a high-density subdivision to the City of Escondido. While permitting this building process to happen any project in the middle of County agriculture land can pop up without any regard to good planning based on the County General Plan and turn into another mini city without any regard to the community plan or the increased traffic impact.

Regarding traffic impact and the change that existing homeowners in the area must contend with if this project is approved as each of the 362 homes will be increasing the traffic on the rural roads by 10 trips a day per home which totals 3,620 trips a day. As most rural roads were not included in the "approved Traffic Impact fee" the roads will remain throughout the years as a level F service.

- R-l-1 Introductory comment noted. Please see responses to specific comments, below.
- R-I-2 The comment is not related to the topics that were the subject of the recirculation and Revised Draft EIR. Please refer to response to comment R-A-1 regarding relevance to the changes in the Recirculated Draft EIR.

R-I-3 The comment is not related to the topics that were the subject of the recirculation and Revised Draft EIR. Please refer to response to comment R-A-1 regarding relevance to the changes in the Recirculated Draft EIR.



R-I-1

R-I-2



http://www.bcsg.org

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County communities are all facing the same problem with lands being annexed from our community into adjacent cities which will change our text in the community plan not to mention the tapestry of our community.

It appears that this developer has a proposed project in South Morrow Hills which is in the City of

Oceanside and has been considered by many as a terrible project and has major problems.

This is an unprecedented action to attempt to null and void a portion of a long-established community plan in the Harmony Grove/Eden Valley neighborhood simply by proposing to change planning area boundaries by a residential developer as staff has indicated that (this has never been done in the unincorporated county to date).

Are we to understand that any developer may seek General Plan Amendments within the county to as this project proposes to avoid being consistent with community plans, visions, goals, and policies and have the Board of Supervisors approve such a project as to give the developers a "forum shopping" for developers unhappy with the restrictions in any given community by annexing into a more lenient jurisdiction? With options that would comply with the Harmony Grove/Eden Valley Community Plan why would this project be considered?

We support the community of Harmony Grove/ Eden Valley and the San Dieguito Planning Group in their concern and request that this project not be approved.

Sincerely,

R-I-7

Margarette Morgan

Margarette Morgan, Chair Bonsall Sponsor Group

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R-I-4 The comment is not related to the topics that were the subject of the recirculation and Revised Draft EIR. Please refer to response to comment R-A-1 regarding relevance to the changes in the Recirculated Draft EIR.

R-I-5 The comment is not related to the topics that were the subject of the recirculation and Revised Draft EIR. Please refer to response to comment R-A-1 regarding relevance to the changes in the Recirculated Draft EIR.

R-I-6 The comment states that the proposed amendment is designed to null and void a portion of the Community Plan. Please see Response R-D-3.

R-I-7 The comment is concerned with how the amendment process is implemented for proposed projects. California law, and the amendment process, allows private property owners to propose uses of their property that vary from projections in an existing plan in a discretionary application. Any developer may seek a general plan amendment, and the proposed amendment will be evaluated through the public review process, staff evaluation, and consideration by the Planning Commission and Board of Supervisors during consideration of the project.

In this particular instance, the Project does not seek annexation into a "more lenient jurisdiction." The Project is located in County jurisdiction, and would remain within the San Dieguito CPA.

Relative to the commenter's preference for an alternative that complies with the EFHGCP subarea lot size without amendment (provided in Chapter 4.0, Alternatives) of the EIR, the decision makers will consider the Project and alternatives in light of benefits, impacts, and over-arching planning goals held by the County.

R-I-8 Comment noted.



