

# BONSALL COMMUNITY SPONSOR GROUP

*Dedicated to enhancing and preserving a rural lifestyle*



March 16, 2015

## VIA EMAIL DELIVERY

Mark Slovick, Project Manager  
County of San Diego  
Planning & Development Services  
5510 Overland Avenue, Suite 310  
San Diego, California 92123

Re: Bonsall Sponsor Group Comments on Notice of Preparation for Newland Sierra PDS2015-GPA-15-00, PDS2015-SP-15-001, PDS2015-REZ-15-001, PDS2015-TM-5597, LOG NO. PDS NO, PDS2015-ER-08-001

We have assessed the Project's potential impacts based on the information available to date, and we have a number of significant concerns. Issues that are of great concern based on the information available to date. This Project proposes to implement urban-style development in a rural area of unincorporated San Diego County (the "County") that lacks the connectivity and transit infrastructure to comply with modern smart growth planning principles. The Project impacts the entire area and will turn Deer Springs Road into a massive freeway bypass system destroying the community's rural character.

### I. THE EIR SHOULD ANALYZE ALTERNATIVES THAT REDUCE IMPACTS

The Project proposes to drastically increase the density in a rural area that contradicts the recently adopted General Plan Update and regional plans developed by the San Diego Association of Governments ("SANDAG"). The General Plan Update designates most of the Project site as RL-20, one unit per twenty acres, which would limit development to approximately 100 units. The EIR should analyze alternatives that reduce density on the Project site, mitigate the impacts of density increases on the Project site, or shift density increases to an alternate location in order to mitigate or avoid traffic, greenhouse gas, fire safety, biological and other impacts.

- A. Alternate Route Alternative: The EIR should Analyze an Alternative that Includes a Four-Lane Road ("Newland Sierra Parkway") Through the Project Site that Avoids Dumping Traffic onto Deer Springs Road.

The most direct route for many residents on the Project's west side-where the majority of residential units are located – to reach the commercial center would be to exit the Project at Sarver Lane and cross Deer Springs Road, re-entering the Project at Mesa Rock Road. Further, the Project proposes to add pedestrian, bicycle, and equestrian traffic to a multi-purpose trail adjacent and parallel to Deer Springs Road. Dumping project traffic on to Deer Springs Road poses a safety threat to the non-vehicular traffic on that road, including the new non-vehicular traffic accommodated on the Project's proposed multi-use path.



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## B. Alternate Location Alternative: The EIR Should Analyze an Alternative Location that is Located in Existing Communities with Infrastructure

The City of Escondido would be the best alternative location and meets all of the principles set forth in the General Plan. All Alternate locations should be considered using planning and GHG emission as well as VMT while preserving rural lands. The EIR should study any other Project site with fewer environment impacts and more in line with the General Plan's Guiding Principles and policies.

## C. Agricultural Alternative: The EIR Should Analyze an Alternative that Implements and Agricultural Use of the Property

The alternative section of the EIR should include an Agricultural Alternative that would utilize the steep slopes of the Project site for the production of lucrative produce providing an economically viable alternative for the Project applicant, which is consistent with the land use designation for the majority of the site as it is designated a Rural Lands in the General Plan. This area is also part of the proposed North County MSCP which has not been approved by the Board of Supervisors but is linking corridor for several animals.

## D. Aesthetics

The urbanization of the Twin Oaks Valley area would irrevocably destroy the community's rural character. Please review the Bonsall Sponsor Group's Community Plan **APPENDIX B INTERSTATE 15/ STATE ROUTE 76 INTERCHANGE MASTER SPECIFIC PLAN** the concern we share with most commuters is that the I-15 not look like Orange County with strip malls from San Diego to the Riverside boundary.

## E. Traffic/Greenhouse Gas Emissions

Because of its location far from existing communities, job centers, and transit infrastructure, the Project will cause long single-occupant automobile trips that increase VMT, resulting in harmful GHG emissions. The EIR should analyze mitigation measures and alternative site location for such a large project.



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## F. Hazards and Hazardous Materials

The proposed Project is located in a High Fire Hazard Severity Zone. Drastically increasing the density on this property puts thousands of people in creased danger from fire hazards and exponentially increases the potential for fire-related damage to property value. The staff report for the NC42 Property Specific Request discussed in notes that the entire site is in a Very High Fire Hazard Severity Zone. The Project contradicts the thoughtful consideration that was given to the density designation on this site during the multi-year General Plan Update process. The EIR should analyze reduced-density alternatives and mitigation measures that will avoid or mitigate density-related fire safety impacts. This Project lacks an emergency evacuation plan to accommodate the current road design and needs to be re-issued.

## G. Land Use and Planning

1. The EIR Should Analyze Whether the Project Will Require Amendments to the General Plan's Guiding Principles

The General Plan lists ten Guiding Principles that apply to all development in the unincorporated County.

1. Support a reasonable share of projected regional population growth.
2. Promote health and sustainability by locating new growth near existing and planned infrastructure, services, and jobs in a compact pattern of development.
3. Reinforce the vitality, local economy, and individual character of existing communities when planning new housing, employment, and recreation opportunities.
4. Promote environmental stewardship that protects the range of natural resources and habitats that uniquely define the County's character and ecological importance.
5. Ensure that development accounts for physical constraints and the natural hazards of the land.
6. Provide and support a multi-modal transportation network that enhances connectivity and supports community development patterns and, when appropriate, plan for development which supports public transportation.
7. Maintain environmentally sustainable communities and reduce greenhouse gas emissions that contribute to climate change.
8. Preserve agriculture as an integral component of the region's economy, character, and open space network.
9. Minimize public costs of infrastructure and services and correlate their timing with new development.
10. Recognize community and stakeholder interests while striving for consensus.

The EIR should analyze the Project's compliance with each of the Guiding Principles as it appears it violates the Guiding Principles in at least the following ways": (1) locating growth far from existing and planned communities, infrastructure, and services; (2) drastically altering existing community character; (3) impacting operations of business that rely on the peace and tranquility of a rural setting;



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(4) disrupting wildlife corridors; (5) developing despite physical constraints posed by the Project site's slope; (6) failing to provide transit options; (7) requiring long single-occupant vehicle trips that increase greenhouse gas emissions; (8) urbanizing a rural agricultural community; (9) requiring the extension of utility services and annexation into the Vallecitos Water District (VWD); and (10) developing the Project despite significant community opposition, and previous rejection of a similar project.

County staff has previously determined that increasing density on the Project site would change the General Plan's objectives and would likely require recirculation of the General Plan's EIR.

## 1. The EIR Should Analyze the Project's Consistency with the General Plan's Leapfrog Policy

General Plan Policy LU-1.2 (Leapfrog Policy) prohibits leapfrog development:

**Leapfrog Development.** Prohibit leapfrog development which is inconsistent with the Community Development Model. Leapfrog Development restrictions do not apply to new villages that are designed to be consistent with the Community Development Model, that provide necessary services and facilities, and that are designed to meet the LEED-Neighborhood Development Certification or an equivalent. For purposes of this policy, leapfrog development is defined as Village densities located away from established Villages or outside established water and sewer service boundaries.

We do not agree with the applicant that one gas station constitutes a village and therefore this project is LEAPFROG DEVELOPMENT.

We appreciate the opportunity to send you are comments regarding this project.

Sincerely,

*Margarette Morgan*

Margarette Morgan, Chair  
Bonsall Sponsor Group



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