

# BONSALL COMMUNITY SPONSOR GROUP

*Dedicated to enhancing and preserving a rural lifestyle*



BY ELECTRONIC MAIL

January 30, 2016

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

RE: Notice of Preparation of Supplemental EIR for the County's Property Specific Requests General Plan Amendment and Rezone

Dear Mr. Wardlaw:

The Bonsall Sponsor Group reviewed the proposed Property Specific Requests submitted to our group and the following are our comments.

1. The County has not completed all of the Planning and Sponsor Group Community Plans throughout the county. That being said the County has an obligation to complete all community plans for the County General Plan (GP) to be whole. Why having a second round of Property Specific Requests (PSR) that are not only out of compliance with the GP but do not meet the growth expatiations of the communities.
2. As the San Diego County General Plan and the Bonsall Community Plan was approved by the Board of Supervisors in 2011 **we have not asked for and do not want to CHANGE our approved community plan how did we get placed on this list?**
3. As all property in Bonsall was reviewed at that time for density and the community of Bonsall residents were willing to see our population change from 11,000 to 17,000 with buffers and a green belts along the boundaries of the community things have already changed and it has been all of five (5) years
4. We have seen a project of 300 acres of prime agriculture land ask to be annexed into the City of Vista on the south west boundary of our community and now with these PSR presented we will now have our eastern boundary impacted on both sides of Highway 15. Again we will see agricultural and our buffers eliminated and thus becoming just another linking community without any identity.
5. The Bonsall Community Plan was established to create density and zoning which staff is moving forward to change 1,181 acres in Bonsall to higher density and the change the tapestry and identity of Bonsall. The PSR near Aqueduct Road have steep slopes and high fire risk, violating Policies LU-6.11, LU-7.1, LU-9.2, S-1.1 and S-7.1.the proposed PSR in Bonsall cannot be reconciled with any of the applicable Update Policies. This area would also require a new road system though out and the loss of more agriculture if approved.



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One of the three Goals of the GP was to promote agriculture however we are losing it by the hundreds of acres both in the GP and through these “late to the GP requests”. Where were they during the General Plan Update and why were they not processed during that time?

6. Who is paying for this density update? Is this the funds that the County proposes to spend of up to \$1.3 million in taxpayer funds to process these requests in a General Plan amendment. This is a private benefit at cost to the public with increased infrastructure and services costs required to serve additional development.
7. When reviewing the GP we noticed LU-1.1 Assigning Land Use Designations. Assign land use designations on the Land Use Map in accordance with the Community Development Model and boundaries established by the Regional Categories Map.
8. GP -LU-1.3 Development Patterns. Designate land use designations in patterns to create or enhance communities and preserve surrounding rural lands. The Bonsall Community Plan 1.2 Community Growth Policy Goal LU-2.1 Development that centers inside the core Village in Bonsall and discourages spot development outside that area. The PSR suggested for Bonsall are not within the community growth policy nor do they support our Residential Land Use while maintaining and enhancing the existing rural atmosphere of the community.
9. GP -LU-2-4 Relationship of Land Uses to Community Character. ENSURE that the land uses and densities within any Regional Category or Land Use Designation depicted on the Land Use Map reflect the unique issues, character, and development objectives for a Community Plan area. How do you rationalize this statement within the approved GP and the spot development being suggested in the PSR?
10. GP - LU-6.2 Reducing Development Pressures. Assign lowest-density or lowest-intensity land use designations to areas with sensitive natural resources. Again the proposed PSR do not conform to the GP nor the Bonsall Community Plan.
11. The NOP does not state why the proposed additional dwelling units are “necessary” or “desirable” to add to the already over 72,683 new units provided for by the newly adopted General Plan or how the General Plan with its focus on planned growth in or adjacent to existing or planned higher density and infrastructure (and thus reduced sprawl and greenhouse gas emissions).
12. The NOP does not, but should make clear what impact if any approval of the individual parcels (or the adjacent “study area” parcels) would have on the pending Accretive Lilac Hills Ranch Project, whether that Project is approved, or denied.



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13. The NOP does not but should make clear what impact if any approval of the individual parcels (or the adjacent “study area” parcels) would have on the pending NewLand Sierra Tentative Map Project, whether that Project is approved or denied.
14. Will there be a Project Alternative that proposes just the Property Specific Request parcels (without the “Study areas”) but at reduced densities that those requested.
15. The NOP does not provide the Public with sufficient information to intelligently comment as required by CEQA.

In summation the Bonsall Community Sponsor Group does not see how staff can prepare the NOP for Property Specific Requests General Plan Amendment and Rezone without having completed the Community plans for all 26 communities in the County of San Diego before they recommend changes to the 1,149 parcels in the communities. The cost to the public is not rational with the \$2.3 million dollar benefit going to private property owners that did not participate in the approved 2011 General Plan this is not a public benefit and the \$2.3 million should not be used for this purpose.

Another concern of the Bonsall Sponsor Group had was with the County of San Diego not currently meeting the State of California’s Green House Gas Emission Standards it appears that the increase in density throughout the unincorporated County that the NOP proposed revision is not in compliance with the State as well as the Community Plans that were approved and included in the 2011 General Plan.

Sincerely,

***Margarette Morgan***

Margarette Morgan, Chair  
Bonsall Sponsor Group



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