

BONSALL COMMUNITY SPONSOR GROUP

Dedicated to enhancing and preserving a rural lifestyle



February 12, 2018

County Board of Supervisors
C/O Kevin Johnston, Land Use/ Environmental Planner
Planning & Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

RE: Property Specific Requests GPA DSEIR SCH No 2015121012

Dear Mr. Johnston:

C3-1

The Proposed Project would consist of a General Plan Amendment (GPA) that would affect approximately 9,336 acres and 882 parcels of unincorporated County lands within nine communities.

C3-2

The land use changes would increase residential densities as compared to the General Plan resulting in county wide the addition of approximately 1,826 potential dwelling units as you know. Included in these noted additional potential dwelling units and acreage totals, the Proposed Project includes an update to the land use designations and zoning for properties within the area of the expired Champagne Gardens Specific Plan (CGSP) to ensure consistency with the General Plan which I know you are aware of and presented to the Bonsall Sponsor Group February 6, 2018.

C3-3

As described more fully below, the Revised CAP and SEIR are legally inadequate by modifying or effectively deleting Mitigation Measure CC-1.2 without additional analysis; erroneously claiming that 2014 is the first year data was available for a greenhouse gas (GHG) inventory; allowing out-of-County offsets; failing to require a reduction in vehicle miles traveled (VMT's) for housing projects; providing only a token annual reduction of VMT's for County employees; and failing to exercise its influence to encourage the San Diego Airport Authority to reduce GHG emissions reductions from airport ground operations, increasing public transit to the airport, and reducing emissions from vehicles serving the airport.

C3-4

Of great importance, no open lands should be annexed or rezoned for greater development until there is an adequate CAP that actually achieves the 2020 emission reduction goals the County agreed to in its 2011 General Plan Update

C3-5

Although the PSR projects considered individually may not have a significant impact on State and regional thoroughfares, the cumulative impact of the 35,557 trips being generated by the PSRs must be taken into consideration as the County considers multiple proposals for significant unplanned development along the I-15 corridor. Full disclosure of these cumulative impacts—for traffic, GHG emissions, and VMT—is especially pressing when taken together with the other large General Plan Amendment proposals, like Newland Sierra, that are currently in process.



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C3-6
C3-7
Moreover, understanding the full scope of impacts from unplanned development proposals is extremely important given that SANDAG does not plan for any transportation infrastructure improvements to the I-15 corridor north of Escondido until at least 2050. Given SANDAG's current funding projection shortfalls, even such far distant future improvements may be in jeopardy. In addition, the PSRs' GHG mitigation plan incorporates the flaws from Mitigation Measure GHG-1 from County's proposed Climate Action Plan that allows General Plan Amendment projects to rely solely on the purchase of carbon offset credits rather than reducing local VMT. This approach to GHG mitigation allows sprawl development projects to clog our local roadways while paying to offset GHG emissions on other continents. Based on the extensive unplanned development the County is currently processing along rural portions of the I-15 corridor in inland North County, drivers relying on I-15 and surrounding thoroughfares will likely be the first to feel the effects of the County's sprawl-facilitating policy changes. It is imperative, therefore, that the County provided full data about the scope of the traffic impacts in this region, including on I-15.

C3-8
The Allowance of Offsets From Outside the County of San Diego Is Inconsistent with the County General Plan's Requirement to Achieve Specified Greenhouse Gas Emissions Reductions in the County.

C3-9
Mitigation Measure CC-1.2 of the County's General Plan Update requires the County to "achieve a 17% reduction in emissions from County operations from 2006 by 2020 and a 9% reduction in community emissions between 2006 and 2020."

C3-10
The Revised CAP and SEIR authorize the use of offsets from outside the County of San Diego. The Draft EIR identifies the County's "priority" list for consideration of GHG reduction features as follows:

1) project design features/on-site reduction measures; 2) off-site within the unincorporated areas of the County of San Diego; 3) off-site within the County of San Diego; 4) off-site within the State of California; 5) off-site within the United States; and 6) off-site internationally.

C3-11
(DEIR, 2.7-48.) These offset priorities, which allow offsets outside of the County, outside of the state, and even outside of the United States, only have to be considered "to the satisfaction of the Director of Planning Development Services." (SEIR, p. 2.7-38.) This provision would impermissibly purport to give the County wide latitude to allow essentially unrestricted use of international credits to balance out local GHG emissions created by County projects. The use of offsets is inconsistent with the County's Mitigation Measure CC-1.2 to reduce GHG emissions within the County of San Diego by specified reduction amounts.



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IV. The CAP Lacks A Requirement to Reduce VMT's from Newly Planned Housing Projects.

The CAP identifies Strategy T-1, which is intended to "Reduce Vehicle Miles Traveled." The CAP contains three measures designed to reduce achieve Strategy T-1: Measure T-1.1 - Acquire Open Space Conservation Land; Measure T-1.2 - Acquire Agricultural Easements; and Measure T-1.3 - Update Community Plans.

C 3-72 The CAP's strategy is an important one. The CAP purports to focus on density in the county villages. (CAP, p. 3-9.) "Focusing new development in and around existing unincorporated communities allows the County to maximize existing infrastructure ... By not developing housing in the more remote areas, the county will avoid GHG emissions from transportation

However, none of the three measures the County identifies contains any enforceable requirements to locate residential housing closer to major sources of employment and transit. Mitigation Measure CC-1.15 does not include anything about limiting VMT's from newly planned housing projects. In fact, as discussed below, by allowing developers to purchase "carbon offsets" instead – which may even be based upon GHG emission reductions outside of the United States – the CAP actually facilitates sprawl.

The County may argue that Measure T-1.3 – Update Community Plans will assist in locating residential housing closer to jobs and transit. However, updating Community Plans does not address residential housing on a countywide basis. Additionally, the Soffel September 25, 2017 Page 5 County improperly passes responsibility for something that is clearly within its control – land use planning in the County – to individual communities.

C 3-13 The CAP's failure to address VMT's from newly planned housing projects is inconsistent with the Sustainable Communities and Climate Protection Act of 2008 (Sustainable Communities Act, SB 375, Chapter 728, Statutes of 2008), which supports the State's climate action goals to reduce GHG emissions through coordinated transportation and land use planning with the goal of more sustainable communities. The County should use its power to establish land use planning priorities for residential housing development in order to reduce VMT's.

C 3-14 Pursuant to SB 375, Metropolitan Planning Organizations, including the San Diego Association of Governments (SANDAG), are required to adopt strategies that show prescribed land use allocation in their regional transportation plans. SANDAG's Regional Plan (available at http://www.sdforward.com/pdfs/RP_final/The Plan - combined.pdf; October 2015) states, "More than 80 percent of new housing in the region will be attached multifamily" (p. 34). The plan also states, "By 2050, 87 percent of the region's new housing and 79 percent of new jobs will be situated within a half-mile of public transit." (p.75) "The projected increase in new housing capacity is generally higher for areas with densities above 20 dwelling units per acre." (Appendix C, Table C.3.) The County should analyze how SANDAG's estimates are impacted by the County's land use planning.



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C3-15 [The County Should Show Compliance with the 2011 General Plan Update's Mitigation Measures Prior to Annexations or Rezoning of Open Lands.

C3-16 [Finally, until a valid, legally adequate CAP is in place that demonstrably will achieve the 2020 emission reduction goals set out in the 2011 General Plan Update, no lands that are currently "greenfields" should be annexed and no General Plan Amendment should be authorized that would allow more intense development of those lands.

C3-17 [The issue of how currently approved and future General Plan Amendments (GPAs) will be addressed by the CAP is a significant issue. As described in this plan, all current and future GPAs are presumed not to have a significant impact on the CAP because of the implementation of DSEIR mitigation measure GHG-1 (GPAs will achieve net zero or obtain offsetting credits). We do not agree with that conclusory statement as we explain later in this comment letter. This introduction to the GPA impacts and mitigation must be more expansive than the current summary.

C3-18 [The table and figure indicate that a disproportionately low percentage/amount of future GHG emission reductions will derive from the "Transportation and Built Environment" category. This raises questions regarding whether the County's CAP is consistent with and supports the goals and expectations of SB 375 (Regional Transportation Plan/Sustainable Communities Strategy) that prioritizes land use changes and transportation efficiencies to reduce per capita vehicle miles traveled (VMT)-based GHG emissions from passenger and light truck vehicles. If the CAP can achieve its 2030 target (and put it on a trajectory to meet the 2050 goal) without contributing its "fair share" to the regional SB 375 reduction targets, that would be a significant impact; it also places a greater burdens on the cities to achieve the regional SB 375 GHG emission reductions.

C3-19 [for Page 3-3, the CAP acknowledges that transportation is by far the largest contributor (45%) to its GHG emissions, yet the CAP only proposes to implement measures that would produce a 13% GHG reduction from this sector by 2030, which is not inline with the regional SB 375 target (a minimum of 21%). While there is no requirement that each emission sector must be reduced proportionate to its contributions, the CAP appears to under-utilize "transportation" sector reduction opportunities, which then places much greater burden to reduce emissions from other sectors.

C3-20 [There is also a big concern that the plan allows for essentially unlimited use of out-of-region carbon credits to offset GHG reductions that projects "can't" accomplish.



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The concerns regarding the MSCP are clear with the following excerpt from the Newland Sierra DEIR.

C3-21 The area offers drainages and ridgelines, the primary features known to support wildlife movement, running in both east-west and north-south directions. Based on research on connectivity in San Diego County (Jennings and Lewison 2013, Jennings and Zeller 2017) and what prior research efforts have learned about wildlife movement and connectivity in the region (Crooks 2002, Lyren et al. 2009, 2008, 2006), the Merriam Mountains appear to be situated in a critical location that currently allows it to serve as an essential wildlife linkage connecting habitat patches north of Escondido, San Marcos, and Vista to the Merriam and San Marcos Mountains, Moosa Canyon, and the San Luis Rey River Bonsall. Although east-west movement is undoubtedly challenged by Interstate 15 (I-15) to the east of the Merriam Mountains, some species may be able to cross (a) through the concrete box culvert located under I-15 (Figures 1 and 2), a feasible crossing structure for many species that was not documented or evaluated in the Newland Sierra DEIR; (b) through the I-15 culverts noted in the DEIR (Table 2.4-12, p. 2.4160), or (c) may attempt at-grade crossings of the freeway. There are also locations to the north and south of the Merriam Mountains that allow for east-west movement past the freeway (e.g., Moosa Canyon). North-south connectivity is likely more important for wildlife movement in the area.

C3-22 I also agree with Tom Kumura of the Twin Oaks Valley Sponsor Group given that the MSCP and the Green House Gas proposals have not been approved by the Board of Supervisors it is incumbent upon the County not to approve the PSR as submitted as part of the PSR texts include data from both of these un-approved proposals.

Sincerely,

Margarette Morgan

Margarette Morgan, Chair
Bonsall Sponsor Group



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Responses to Letter C3, Bonsall Community Sponsor Group

- C3-1 The comment provides a summary of the Proposed Project that would consist of a General Plan Amendment.

The comment does not address the adequacy of the Draft SEIR and, therefore, no further response is required or necessary.

- C3-2 The comment provides a summary of the Proposed Project, number of additional dwelling units, and updates to the land use designations and zoning for properties within the Champagne Gardens Specific Plan.

The comment does not address the adequacy of the Draft SEIR and, therefore, no further response is required or necessary.

- C3-3 The comment states that the County's Climate Action Plan (CAP) and SEIR are legally inadequate and then provides an introduction to comments that follow. Those comments are responded to below. The County Board of Supervisors approved the CAP and certified the SEIR on February 14, 2018.

The comment does not address the adequacy of the Draft SEIR for the Proposed Project and, therefore, no further response is required or necessary.

- C3-4 The comment states that of great importance, is that no open lands should be annexed or rezoned for greater development until there is an adequate CAP that achieves 2020 emission reduction goals in the 2011 General Plan.

The CAP was adopted by the Board of Supervisors on February 14, 2018. The CAP is a qualified CAP under CEQA Guidelines Section 15183.5 that will achieve emissions reductions required from AB 32 and SB 32. Please refer to response to comment O3-121. The comment does not address the adequacy of the Proposed Project's Draft SEIR. Therefore, no further response is required or necessary.

- C3-5 This comment states that although the PSR projects may not have significant impacts on State and regional thoroughfares when considered individually, the cumulative impacts of 35,557 trips must be taken into consideration as the County considers multiple proposals for significant unplanned development along the I-15 corridor. Full disclosure of cumulative impacts for traffic, GHG, and VMTs is especially important when taken together with the other large GPA proposals, like Newland Sierra, that are currently being processed.

See response to comment O6-2 regarding GHG analyses, and response to comment O6-3 regarding GPAs that are currently in progress.

In regards to a Vehicle Miles Traveled (VMT) analysis, draft amendments to the State CEQA Guidelines that would implement Senate Bill (SB) 743 are currently being reviewed by the State of California Natural Resources Agency, and the County of San Diego has not yet adopted VMT-based CEQA guidelines or thresholds. Thus, from a transportation evaluation perspective, no VMT analysis is required, nor could significant impacts be determined based on this metric at this time.

- C3-6 This comment states that understanding the full scope of impacts from unplanned developments is particularly important because SANDAG does not plan for any transportation infrastructure improvements to the I-15 corridor north of Escondido until 2050.

The County acknowledges this comment and acknowledges that freeway improvements are not in the San Diego Association of Governments (SANDAG) Regional Transportation Plan (RTP) until the Year 2050. However, note that the proposed project would only change the General Plan land use designations and zoning within the Analysis Areas. Future individual projects developed within the PSR areas will still be required to complete a development project-level CEQA analysis prior to their development. The Draft TIA did not identify impacts to freeway segments and therefore, it did not need to include further analysis.

However, in response to this and other comments a Memorandum dated April 9, 2018 describing Freeway Mainline Analysis dated April 9, 2018 has been added to the Draft TIA to document the projected future year freeway mainline operations with implementation of the Proposed Project as Appendix E4. This Memorandum provides additional explanation as to why there would be no significant impacts to the freeway segments.

- C3-7 The comment states that the Proposed Project's GHG mitigation incorporates the flaws from Mitigation Measure GHG-1 from the County's CAP that allows GPAs to rely on purchasing carbon offsets rather than reducing local VMT. It further suggests that this approach allows sprawl development to clog roadways while paying to offset GHG emissions on other continents. The commenter says that based on unplanned development in process along rural portions of the I-15, drivers relying on the I-15 and surrounding thoroughfares will likely be the first to feel the effects of sprawl-facilitating policy changes.

Regarding future project reductions of VMT, the Proposed Project provides mitigation from the General Plan (Mitigation Measure CC-1.15), which is incorporated into the Proposed Project SEIR and will be applied at this program level to reduce impacts from VMT. This mitigation measure was approved to reduce impacts from VMT in 2011 through the certified PEIR for the General Plan Update. The Proposed Project supplements the 2011 GPU PEIR through this supplemental analysis and relies on General Plan Mitigation Measure CC-1.15 as well as all other General Plan policies and mitigation to reduce GHG emissions to less than significant levels. The Draft SEIR, therefore, provides substantial evidence that GHG emissions would be reduced to less than significant levels. No further response is required or necessary.

Regarding the adequacy of carbon offsets as mitigation under CEQA Guidelines section 15126.4(c)(3) please refer to response to comment O3-113 and O3-130.

Regarding traffic impacts in the region, including I-15 please see response to comment C3-6.

- C3-8 The commenter states that the allowance of offsets from outside of the county of San Diego is inconsistent with the County's General Plan. The County does not agree with this comment. Please see response to comment C3-11 below.

- C3-9 The comment sites Mitigation Measure CC-1.2 of the County's General Plan that requires the County to achieve reduction in emissions from 2006 by 2020. The County's CAP was approved by the Board of Supervisors on February 14, 2018 with revisions to Mitigation Measure CC-1.2 to

reflect current targets required under AB 32 and SB 32. This comment does not address the adequacy of the Draft SEIR and, therefore, no further response is required or necessary. Please refer to response to comment C3-11.

- C3-10 The comment states that the County's CAP authorizes the use of offsets from outside the County of San Diego and continues to list the mitigation geographic hierarchy for off-site GHG mitigation. Please refer to response to comment O3-113 and O3-130. This comment does not address the adequacy of the Draft SEIR and, therefore, no further response is required or necessary.
- C3-11 The comment describes the GHG mitigation in the Draft SEIR and notes that the location of carbon offsets as off-site mitigation only have to be considered to the satisfaction of the Director of Planning & Development Services. The comment states that this provision would impermissibly purport to give the County wide latitude to allow essentially unrestricted use of international credits to balance out local GHG emissions created by County projects. The use of offsets is inconsistent with the County General Plan Mitigation Measure CC-1.2 to reduce GHG emissions within the County of San Diego. The County does not agree with this comment. Please refer to response to comment O3-113 and O3-130.

Regarding the General Plan Mitigation Measure CC-1.2, the Board of Supervisors approved the CAP on February 14, 2018 with revisions to Mitigation Measure CC-1.2 to bring the requirement into compliance with SB 32's reduction targets for 2030 and was prepared to be consistent with the requirements of CEQA Guidelines Section 15183.5. The approved CAP requires more stringent reductions targets than what was originally required in the General Plan and summarized in this comment letter. This comment does not pertain to the adequacy of the Draft SEIR and no further response is required or necessary.

The County disagrees that the use of offsets is inconsistent with General Plan Mitigation Measure CC-1.2. Carbon offsets as mitigation are expressly authorized under CEQA Guidelines section 15126.4(c)(3). As stated in the General Plan Update (GPU) PEIR, 2011 GPU Mitigation Measure CC-1.2 requires the County to prepare a CAP to reduce emissions from County operations and within the unincorporated county. The CAP approved by the Board of Supervisors on February 14, 2018 does this through implementation of 26 GHG Reduction Measures within the unincorporated county and from County operations. The County disagrees with the comment that GPU Mitigation Measure CC-1.2 requires all mitigation to reduce cumulative impacts from the Proposed Project to be local and that to allow mitigation to achieve GHG reductions out-of-county would conflict with the requirements of 2011 GPU Mitigation Measure CC-1.2. The County has full discretion to allow the achievement of GHG emissions reductions within or out-of-county as long as those measures can be demonstrated through substantial evidence to feasibly reduce GHG emissions. See response to comment O3-113 and O3-130.

- C3-12 The comment states that the County's CAP lacks a requirement to reduce VMT from newly planned housing projects. The comment summarizes the measures in the CAP designed to reduce VMT. The commenter claims that none of the measures in the CAP contain enforceable requirements to locate residential housing closer to major sources of employment and transit.

The commenter claims that updating community plans as a CAP reduction measure does not address residential housing. The comment does not pertain to the adequacy of the Draft SEIR, but, in fact, deals solely with a separate project—the County’s CAP—that was approved by the Board of Supervisors on February 14, 2018. Therefore, no further response is required or necessary.

- C3-13 The comment states that the CAP fails to address VMT from newly planned housing projects, which is inconsistent with SB 375 and states that the County should use its power to establish land use planning priorities for residential housing to reduce VMTs. The comment pertains to the CAP project, which was approved by the Board of Supervisors on February 14, 2018. The comment does not address the adequacy of the Draft SEIR and, therefore, no further response is required or necessary.

- C3-14 The comment summarizes SB 375 and SANDAG’s requirement to adopt strategies that show prescribed land use allocation in their regional transportation plans. The comment provides a link to SANDAG’s Regional Plan and provides statistics from that plan regarding housing and jobs. The comment says the County should analyze how SANDAG’s estimates are impacted by the County’s land use planning. The comment does not address the adequacy of the Draft SEIR and, therefore, no further response is required or necessary. The comment will be included in the Final SEIR for the decision makers.

- C3-15 The comment says the County should show compliance with the 2011 General Plan mitigation measures prior to annexations or rezoning of open lands. The comment does not address the adequacy of the Draft SEIR. Therefore, no further response is required or necessary. The comment will be included in the Final SEIR for the decision makers.

- C3-16 The comment states that until a valid, legally adequate CAP is in place that demonstrably will achieve the 2020 emission reduction goals set out in the 2011 General Plan, no lands that are currently “greenfields” should be annexed and no GPAs should be authorized that would allow more intense development of those lands. The County Board of Supervisors approved the CAP on February 14, 2018 with reduction targets that will be achieved for 2020 and 2030. The comment does not address the adequacy of the Draft SEIR. Therefore, no further response is required or necessary.

- C3-17 The comment does not agree with how GPAs were addressed in the CAP. The comment says they do not agree with a conclusory statement or introduction to GPA impacts and mitigation must be more expansive than the current summary. The comment pertains to the CAP project, which was approved by the Board of Supervisors on February 14, 2018. The comment does not address the adequacy of the Draft SEIR and, therefore, no further response is required or necessary.

- C3-18 The comment points to a table and figure from the CAP and states that it raises questions regarding whether the County’s CAP is consistent with and supports the goals and expectations of SB 375. The commenter states that if the CAP can achieve its 2030 target without contributing its “fair share” to the regional SB 375 reduction targets, that would be a significant impact and would place a greater burden on cities to achieve the regional SB 375 reductions. The comment pertains to the CAP project, which was approved by the Board of Supervisors on

February 14, 2018. The comment does not address the adequacy of the Draft SEIR and, therefore, no further response is required or necessary.

- C3-19 The comment provides a figure from page 3-3 of the County’s CAP. The commenter says that because the CAP project would only achieve a 13% reduction in GHG emissions from the transportation sector, it would not be in line with the SB 375 targets. The comment says the CAP appears to under-utilize transportation sector reduction opportunities. The comment pertains to the CAP project, which was approved by the Board of Supervisors on February 14, 2018. The comment does not address the adequacy of the Draft SEIR and, therefore, no further response is required or necessary.

- C3-20 The comment says there is a big concern that the plan [CAP] allows for unlimited use of out-of-region carbon credits to offset GHG reductions that projects “can’t” accomplish. The comment pertains to the CAP project, which was approved by the Board of Supervisors on February 14, 2018. The comment does not address the adequacy of the Draft SEIR and, therefore, no further response is required or necessary.

- C3-21 The comment expresses concerns regarding the MSCP and provides an excerpt from the Newland Sierra project, which is a separate project in process with Planning & Development Services. The excerpt provides context and environmental setting on the Newland Sierra project. The comment does not address the adequacy of the Draft SEIR and, therefore, no further response is required or necessary.

- C3-22 The commenter agrees with Tom Kumura of the Twin Oaks Valley Sponsor Group given that the MSCP and greenhouse gas proposals have not been approved by the Board of Supervisors it is incumbent upon the County not to approve the PSR as submitted and as part of the PSR texts to include data from both of these un-approved proposals. The comment does not address the adequacy of the Draft SEIR. Therefore, no further response is required or necessary. The comment will be available in the Final SEIR for the decision makers.