

**Rough Acres Ranch**  
**Notice of Preparation / Initial Study**  
**Comment Letter #10**  
**Chris Noland**

**Erin Crouthers**

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**From:** Bennett, Jim [Jim.Bennett@sdcounty.ca.gov]  
**Sent:** Tuesday, May 20, 2014 2:29 PM  
**To:** Erin Crouthers  
**Cc:** Campbell, Dennis  
**Subject:** Rough Acres Ranch - Comment Letter#10

Jim Bennett, P.G. #7707, CHG#854  
Groundwater Geologist

**County of San Diego**

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**From:** Chris Noland [<mailto:sdrockguy@hotmail.com>]  
**Sent:** Monday, May 19, 2014 3:18 PM  
**To:** Bennett, Jim; Campbell, Dennis  
**Cc:** Donna Tisdale  
**Subject:** Rough Acres Ranch PDS2012-3300-12-021 (MUP);PDS2012-3910-1221005 (ER)

Please add these scoping comments to the record for the Rough Acres Ranch MUP/EIR.

I support the Boulevard Planning Group's stated concerns with the new large-scale Rough Acres Ranch project planned for the beautiful McCain Valley, along with utility-scale cumulative impact projects: Iberdrola's Tule Wind, Soitec's Rugged Solar, Rough Acres Ranch Road, and new Sunrise Powerlink.

Major concerns include, incompatible land uses; groundwater impacts - specifically to neighboring property owners; increased fire risk, increased noise - (due to high number of campers, use of electrical generators, gun range), light, dust, odor and visual pollution; adverse impacts to biological, cultural, and recreational resources; and increased traffic, off-site OHV activities, and trespassing impacts for existing residents in the adjacent rural neighborhoods.

Other items to note should be the use of a 20,000 chicken ranch that is in the same general vicinity of campsites. Other chicken ranches of this size within the County of San Diego has brought complaint after complaint of odors.

Another significant item to note is the potential for off-site degradation of groundwater quantity and quality. For this reason, notification of residents should extend to at least 1 mile based on the projected use of groundwater. Baseline groundwater monitoring should also include those residents wishing to participate. Transducers should be installed in participant's wells.

Based on the volume of water anticipated to be used by the construction of other projects not related to this one, it would be in the County's best interest to install the transducers as soon as possible.

Based on the fact that climate change is not addressed in the current groundwater ordinance and not likely to be updated prior to the project, source capacity studies should not be limited to those in the current groundwater ordinance. Should climatic and meteorologic data not support current recharge models in the groundwater basin, isotopic analysis should be performed to determine the vulnerability of the aquifer. The use of isotopic methods in groundwater investigations is gaining widespread acceptance among hydrogeology professionals. Well-established techniques such as using stable isotopes of hydrogen and oxygen as markers of water source have been applied in water resource investigations for several decades. There are several labs that can perform these types of isotope analyses.

Based on the value of groundwater in this area and the occupancy above and beyond current zoning, it may be prudent for the applicant to perform a source capacity study that includes surrounding residential wells.

With an outdoor gun range, it may be difficult for the project proponent to regulate the type of guns or ammo used, therefore, this can lead to noise issues, fire danger, and potential for leaching of lead based ammo over time to the groundwater.

Please add my name to the list to receive future project notices.

Regards,

Chris Noland

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