

Comment Letter T

Tieber Comments Mar 20 2013.txt  
 From: Judy tieber [jtieber@cox.net]  
 Sent: wednesday, March 20, 2013 9:29 AM  
 To: Stiehl, Carl  
 Subject: Tiered Equine Ordinance draft EIR

Good Morning Carl, I have read and re-read this document and have only a few comments:

1. In unincorporated metropolitan areas such as Bonita/sunnyside (Sweetwater Planning Group), 10 horses/acre is insufficient to meet public demand for equine boarding and training facilities. I suggest (as endorsed by both the Sweetwater Planning Group and the Sweetwater Civic Association) 15 horses/acre with a 5 acre minimum lot size.

T-1

2. On page S-12 #5 Odors Mitigation Measures: "Animal waste shall be stockpiled in an enclosed, covered containment vessel to ensure anaerobic off-gassing and associated odor generation is minimized". This is a very dangerous statement because horse manure is prone to self-combustion when contained in this manner during hot and dry weather. This is a lesson that is often learned by new equestrian center operators, and oft forgotten by experienced operators. Manure has to be able to breathe. For example, I was boarding my horses at the Del Mar track stables during the Del Mar National Horse Show several years ago when a spontaneous combustion fire started in the manure bin which also contained straw that was cleaned out of the box stalls. It really did burn and we really saw flames, and it was really treated as an emergency condition by track personnel. As the top layer of manure dries out, there is no odor. But the stockpile must breath. I suggest document wording be changed to:

T-2

Animal waste shall be stockpiled in an open containment vessel that is stored in an area away from neighbors to minimize any unpleasant odors. Containment vessel must be covered during periods of rain to comply with associated Clean Storm Water Act (or whatever it is called). Closed containment vessels that are emptied weekly shall be used for boarding 3 horses or fewer.

3. I did not note page or # for the following statement: "Require all equine facilities of any Tier category to ensure horse stalls was washed and cleaned 2 x day." I'm not sure where this is coming from, but it is not possible to "wash" a stall 1 or 2 x day:  
 a. water is too costly to waste on this.  
 b. It would make a horrible muddy mess  
 c. No owner who pays extra for a box stall would want their horses exposed to this  
 d. we could never afford to replace stall bedding (shavings) once or twice a day  
 e. we clean/remove manure and soiled (pee soaked) bedding once a day. That is sufficient to maintain a healthy environment

T-3

4. I didn't see anything that suggests the need (I feel is a requirement) to remove manure daily

T-4

Response to Comment Letter T

Mount Miguel Equestrian Center

Judy Tieber

March 20, 2013

**T-1** Staff cannot support a change from 10 horses per acre to 15 horses per acre. The recommended change does not meet with project objectives. The EIR did not analyze up to 15 horses per acre. In addition, the higher number of horses at 15 per acre is double the number the highest other jurisdictions allow, for example Los Angeles and Orange Counties which allow for 8 horses per acre.

**T-2** Agree, manure must be properly composted or spread in compliance with the grading, stormwater and watershed protection ordinances. As required by the draft ordinance and county code, manure must be removed from the property a minimum of every other week. This will limit the potential for self combustion during hot and dry weather. The ordinance has been revised in respect to this comment.

**T-3** Agree, water usage should be limited. This has been revised to once per day in the ordinance.

**T-4** Agree, this has been clarified in the ordinance. Manure must be removed from all areas at least once per day.

## Response to Comments

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from all riding/turnout arenas, grooming and tacking areas, and isle ways and walkways, i.e. any place horses might congregate that is outside of the corral/box stall. ↑ T-4  
↑ Cont.

I hope these comments are useful to you and your team in finalizing the TEO EIR.  
Thank you.

Judy Tieber  
Mt Miguel Equestrian Center  
Bonita

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