



DEPARTMENT OF PARKS AND RECREATION
COLORADO DESERT DISTRICT
200 PALM CANYON DRIVE
BORREGO SPRINGS, CA 92004
760-767-4037

Lisa Ann L. Mangat, Director

December 31, 2015

County of San Diego
Planning & Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

PROJECT NAME: Property Specific Requests General Plan Amendment and Rezone
PROJECT NUMBER(S): PDS2012-3800-12-005; PDS2014-REZ-14-006
ENV. REVIEW NUMBER: PDS2012-ER-12-00-003

To Peter Eichar and Relevant County of San Diego Staff:

As representative of the Colorado Desert District of California State parks, I would like to comment on the proposed Project changes to Land Use designations affecting the Anza-Borrego Desert State Park®. The Probable Environmental Effects listed in the Notice of Preparation, because of increased residential density, are of concern because of the negative impacts to lands adjacent and near State Park lands.

I would like the County of San Diego to reconsider increasing residential density and/or possible changes to commercial or industrial Land Use designation within the Desert Subregion (approximately 338 acres). Proposed changes may negatively affect State Park land aesthetics, air quality, biological resources, cultural resources, geology and soils, hydrology and water quality, noise, recreation, and traffic. In addition, affected land adjacent to State Park land west of Borrego Springs Road at the mouth of Tubb Canyon contain a rare Old Growth Ocotillo Forest of substantial and irreplaceable biological and aesthetic value.

Please keep me informed as the planning and review process continues for the Desert Subregion so that we can participate in the collective process.

Sincerely,

Dan Falat
District Superintendent

From: [Paulette Ache](#)
To: [Eichar, Peter](#)
Subject: Proposed development of DS24
Date: Tuesday, February 02, 2016 2:43:33 PM

Dear Mr. Eichar:

As a residents of Borrego Springs, we are very concerned about the proposed amendment to the General Plan which would rezone Borrego Country Club Estates (DS24).

Since Borrego Springs already has a well-documented water crisis, changing the current requirement from 1 house per 10 acres to 1 house per 1 acre will only exacerbate the situation. How will this help our small town and who will benefit from the change?

Also, anyone who has spent time in the desert knows, once the land has been disturbed, fine sand particles blow everywhere. There's a real health problem here. As you know, there is an off-road vehicle park as well as a shrinking Salton Sea to the east of us. To allow another 171 acre development to the west means no matter where the prevailing winds, Borrego will be under a cloud of brown particles.

The amendment of the General Plan zoning requirements will further deplete the aquifer and will worsen our air quality. We urge that the General Plan not be amended.

Sincerely,

Paulette Ache and Bill Holst
PO Box 655
Borrego Springs, CA 92004

pauletteache@hotmail.com

From: [Joan Allen](#)
To: [Eichar, Peter](#)
Subject: Project DS24
Date: Wednesday, February 03, 2016 9:31:52 PM

Dear Sir: I am a resident of Borrego Springs and am quite concerned about the plan called Borrego Country Club Estates that this developer is trying to push on our town. This land is an old growth forest of beautiful Ocatillos that bloom as spring arrives. It is an amazing burst of color and is awesome to see them all in bloom. I pass this grove everyday and it is beautiful all year as well. People come from far away to see them. They have lived here unbothered and truly loved for many years . Borrego Springs doesn't have alot of beautiful vegetation to brag about and enjoy. It would be such a shame to level this beautiful landscape just so some outside developer could come in and tear up our town. He might be laughing all the way to the bank, but we would be crying as though we'd lost all our children. Please take this to heart and consider the people of Borrego Springs and their love for this land that has been such a joy to them for so many years. Thank you for your time and deep consideration in this most grave and important decision. I trust that you will consider all our letters.
Sincerely, Joan Allen, 3510 San Pablo Ct., Borrego Springs.

From: [Ross Anthony](#)
To: [Eichar, Peter](#)
Subject: Rudyville
Date: Thursday, February 04, 2016 3:49:28 PM

Mr. Eichar,

My wife and I both greatly enjoy our regular trips out to the Anza Borrego Desert and Borrego Springs for the beauty and simplicity. The Ocotillos and sand dunes are a staple of the landscape and unique to this area of San Diego County. I respectfully urge you to reconsider your plans for the Rudyville development at the cost of removing any amount of these features for the development of more homes, as there more lots currently available than there is demand for them. The removal and degradation of the unique scenery and wildlife species that inhabit these areas are too great a cost to bear for any perceived benefits this development may offer.

Respectfully yours,

Ross Anthony



From: [Ken Baer](#)
To: [Eichar, Peter](#)
Subject: DS24 / Borrego Country Club Estates: TOO MANY ADVERSE ENVIRONMENTAL IMPACTS
Date: Thursday, February 04, 2016 2:37:10 PM

Dear PETER EICHAR,

I am opposed to the development of DS24 / Borrego Country Club Estates based on the overwhelming negative impacts it would have on the environment.

- 1) the proposed development is in a flood plain,
- 2) flood mitigation would require the taking of private property solely for the benefit of these developers
- 3) the proposed EIR can not conform to the requirements of the new Sustainable Groundwater Management Act that went into effect in January 2015 because the regulations have yet to be promulgated,
- 4) there are multiple endangered species on this parcel, as well as a relic sand dune and an ancient ocotillo forest,
- 5) the grating of the relic sand dune would create a source of increased air pollution in the valley,
- 6) there is no need to create more residential lots in Borrego Springs as there are already hundreds, if not thousands, of unsold lots.

In addition, the development is inconsistent with the Borrego Springs Community Plan (2010); here is an excerpt:

"There is significant development pressure for housing and commercial development projects that are not consistent with our community character. Of special concern are those proposed plans that do not take the fragile ecosystem into account, or are sited on botanically-rich, mature, native desert vegetation and which would significantly impact dark skies, scenic and vegetative elements of the community character."

Please count my vote 'AGAINST' this development as it would do irreparable harm to the environment.

I would like to be notified of any meetings or comment periods for DS24 / Borrego Country Club Estates.

Thank you,

Ken Baer
1644 Las Casitas
Borrego Springs, CA 92004



From: [hank barber](#)
To: [Eichar, Peter](#)
Subject: DS24/Borrego Country Club Estates (Rudyville)
Date: Thursday, February 04, 2016 12:12:07 PM

I have lived in Borrego for over 15 years, initially as a snowbird and now as a full time resident.

As an unincorporated community we do not have direct control over our unique town and must rely on the county supervisors to know and understand our community. Rudyville is a detrimental, precedent setting planned development. It is a bad idea. It was a bad idea when it was considered before; it is still a bad idea.

Let me list the reasons:

1. Lack of water. At the current rate of decline in our aquifer, the town only has 15-20 years of water left. Any new large scale development would accelerate this decline.
2. Plenty of existing lots. Drive around Borrego and look at the number of existing lots/homesites that exist. There are hundreds, maybe over a thousand. These lots will someday have a house on them and this must be factored into your decision regarding Rudyville. The focus of our development must be to fill out the existing lots (which will also accelerate the decline in our water).
4. The environment. Since there are already many, many lots available, why destroy more of our fragile environment. You know, Rudyville is in the middle of an ancient Ocotillo Forest. Some of these iconic plants are well over 200 years old. The desert deserves respect for its slow growing beautiful plants.
5. Dust Storm. Take away the plants for the development and there will be massive dust storms that come from the very windy Tubb Canyon. The dust storms will affect many local residences that are on the east side of Borrego Springs Road.

In summary, please slow down; consider what the people who live in Borrego have to say. Really, the priority in Borrego should be to help us find ways to slow the decline in our water table. Additional development is the last thing we need in our little town.

If there is to be development at least let it be done on the vast amount of agricultural land that is fallow and already creating dust storms.

Thank you for your consideration.
Hank Barber

Hank Barber
760-693-2310
3414 Carillo Road
Borrego Springs, Ca 92004

From: [mary barber](#)
To: [Eichar, Peter](#)
Subject: Rudyville development
Date: Thursday, February 04, 2016 12:31:52 PM

I am a resident of Borrego Springs and was quite surprised to suddenly learn of a new plan for a housing development in Borrego. It seemed to have surfaced overnight and seems related

to an old development plan that was squashed for very good reasons.

Those reasons still seem viable.

We have many buildable lots available in this town already.

Creating this new development near Borrego Springs Road and Country Club road will destroy

an outstanding ocotillo forest, open the area to dusty wind storms, add more water problems for an aquifer that is already overdrawn and serve no purpose, since we do not need more empty houses.

Please consider the wishes and needs and concerns of the residents of Borrego Springs and squash this development idea.

Mary C. Barber

From: [Mary Ann Cincotta](#)
To: [Eichar, Peter](#)
Subject: Borrego Country Club Estates (DS24)
Date: Friday, February 19, 2016 3:59:27 PM

Dear Peter Eichar:

As a homeowner, property taxpayer, and part-time resident of Borrego Springs, I am writing to express my opposition to the proposed rezoning, and, indeed, any development, of the area in Borrego Springs owned by Rudy Monica and Chris Brown and referred to as Borrego Country Club Estates (DS24). Further, the proposed EIS should not be allowed to go forward at taxpayer expense (perhaps Mssrs. Monica and Brown should pay for it themselves).

My reasons are as follows:

1. The area is a flood plain directly below a steep mountain slope that can receive large amounts of flash-flood drainage;
2. Development would involve clearing the land of a mature , undisturbed stand of ocotillos, which are threatened by development throughout the southwest;
3. Grading would raise a significant amount of dust in an area prone to high winds;
4. Mitigation of dust created by grading (to say nothing of the additional houses) would place an undue strain on an aquifer that is severely over drafted;
5. A previous proposal to develop this land at a density of one house per 10 acres was not approved. By what stretch of the imagination should rezoning to one house per acre be considered acceptable?
6. Chris Brown is a former staff member to Commissioner Horn. Approving a development partly owned by Brown smacks of cronyism, at the very least.

Before you consider allowing development on this land, you should visit Borrego and see the ocotillos in bloom. They're just getting started this week.

Mary Ann Cincotta, PhD
PO Box 375
Borrego Springs CA 92004

From: [Steve Cook](#)
To: [Eichar, Peter](#)
Subject: DS24 Borrego Country Club Estates.
Date: Thursday, February 04, 2016 9:12:43 AM

Hello and greetings

I am a Borrego Springs citizen and property owner concerned about the development of DS24 - Borrego Country Club Estates.

The vast majority of our residents (according to our social media groups) are concerned and oppose the development of the land in question.

Aside from the aesthetic and preservation issues there are environmental and financial reasons we are opposed to it.

The main reasons are that the property is in flood zone and there is a flash flood river/wash running through it as we speak. The diversion would run the water through somebody else's property destroying it.

It is also directly in the path of the wind funnel coming out of Tubb Canyon on an almost daily basis.

It is one of the windiest places in Borrego Valley. There is a residential area of many many homes directly downwind of the project. Grading and removing the vegetation will cause daily dust storms to descend upon those homes making a mess of dirt on their homes, cars, patios, and swimming pools.

Additionally our population has been almost stagnant and has remained around the 3,000 mark in the thirty five years I've lived in Borrego Springs. And many of those are winter residents.

The population, business and visitor activity drops considerably in the warmer months.

There are already many failed developments, many vacant homes, and many many residential lots that have not been built upon throughout Borrego Springs. We really don't need more.

Please consider this when making decisions that affect the entire community.

Thank you,
Steven Cook
Borrego Springs, CA

January 19, 2016

Cheryl Criss
9574 Paseo Montril
San Diego, CA 92129
Ph: 858-566-7819

Attn: Peter Eichar:
Department of Planning and Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

**RE: Borrego Country Club Estates
Project # DS24**

Dear Mr. Eichar;

Regarding the above mentioned plan, aka, Rudyville, I must oppose the proposition that this project would enhance our community on multiple levels, in fact it would be a detriment and I believe a disaster to approve this plan.

Here's why,

1. The property known as Rudyville has been under question for some time. I don't want to make assumptions or point fingers at our politicians, but a few years back this project tried to slip through the red tape without citizen awareness or for that matter also EIR. For many reasons it fell apart and rightful so.

Now that it has suddenly resurfaced, let me explain, as a resident, why this is not only a degradation of the community, but in fact an environmental disaster.

1. First and foremost, I own a home in Tubb Canyon, 3532 Country Club Road, Borrego Springs. The winds are common, prevalent, strong and destructive which flow from the West. 50 to 70 MPH winds are not uncommon. Scraping off of 172 acres of desert in that area (which doesn't regenerate), is not only environmentally unsound it is catastrophic, especially those who live East of that location. Disrupt the desert and you get horrific Sandstorms! Example: the solar farm on Di Giorgio Road—I've got pictures where sunlight was obscured by the dust from the solar plant, roads were covered in sand, like a movie directed from Hell.
2. The ground "Rudyville" proposes to prepare for 172 individual acre lots, would have to be scraped of the beautiful Octotillo forest (some of the oldest living trees next to the Sequoias) ---with the great environmental concern we have today, how could this even be a consideration?
3. Water! Borrego is trying to address our dire concern for the depleted aquifer. The survival of our community as it stands today is tipping towards extinction.

Adding access to water for another 172 homes at this point is impossible to imagine. However, when we do get rain, there's plenty of proof that it floods out of Tubb Canyon and two years ago heavy rains parked over the mountains washed out the berm that held flood waters back for decades. No plans to repair that berm have I heard of AND the proposed Rudyville would sit smack dab in the middle of that flood path!

4. This is important! There are many building lots available for sale in Borrego, and have been for many years, and yet have not sold. Borrego is a depressed market compared to the City of San Diego, so grading another 175 acres to dirt is simply insane.
5. I find it so questionable that Mr. Rudy Monica was a former staff member of our Supervisor Bill Horn. That smacks of something not right and I'll make sure people in Borrego are aware of that.
6. Something is much amiss here and I hope you address it. In the meanwhile, the residents of Borrego are unhappy and will be more so as they learn more about this and the connection between Supervisor Horn and Mr. Rudy Monica. I promise you, as I will circulate this letter.

Sincerely,
Cheryl Criss

A handwritten signature in cursive script that reads "Cheryl Criss". The signature is written in dark ink and is positioned below the typed name.

From: [Karen DeLorenzo](#)
To: [Eichar, Peter](#)
Subject: Borrego Country Club Estates Project # DS24
Date: Saturday, January 23, 2016 11:09:37 AM

January 23, 2016

Peter Eichar
County of San Diego
Planning & Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

RE: Borrego Country Club Estates
Project Number DS24

Dear Mr. Eichar,

My husband and I are in opposition to the project known as Borrego Country Club Estates, DS24 for which there has been issued a Notice of Preparation of an Environmental Impact Report (EIR.)

We oppose this project for the following reasons:

- 1.) The Sustainable Groundwater Management Act, in effect as of January 2015 has not yet issued regulations. Based on our understanding of the current groundwater and aquifer situation in Borrego Valley building homes at the requested density (one home per acre) would be in violation of this Act. According to the recent USGS report cited in the January 14, 2016 issue of the Borrego Sun there is currently 20,000 acre feet being extracted from the aquifer with only 5,700 acre feet being added by natural recharge. The water is simply not there for new homes in this area.
- 2.) The grading and land preparation for this proposed development would further increase the air pollution we now experience, due to the desert environment, the ORV activity at Ocotillo Wells, and the recent installation of solar farms in the valley.
- 3.) This area is home to a variety of endangered species, including an ocotillo forrest (already being stressed by California's ongoing drought) as well as a desert Sand Dune community.
- 4.) The potential for increased traffic on Country Club, Broken Arrow and Wagon Roads both from construction equipment and, in the future, additional residential cars. This is a serious issue especially since the south end of Country Club Road which connected to S-3 has been bulldozed, fenced-off and otherwise permanently blocked by a local property owner.
- 5.) The location of the flood plain, which flooded seriously about two years ago, runs right through this proposed development. That particular storm/flood event also removed old earthen berms which directed waters around the few homes in the Tubb Canyon area. Any flood mitigation that would be part of the SD24 project would potentially affect those homes below it in this same flood plain. We invested several thousand dollars in flood mitigation at our property; we do not want our property to be lost because of ill-considered development of this area.

We appreciate the opportunity to comment on this project and ask that our concerns be incorporated into the Notice of Preparation of an Environmental Impact Report on DS24, Borrego Country Club Estates.

Sincerely,

Karen J. DeLorenzo

Anthony P. DeLorenzo

3237 Country Club Road
PO Box 613
Borrego Springs CA 92004

e-mail: ktdelorenzo@gmail.com

phone: 360-301-5446

Submitted by EMAIL to Peter.Eichar@ sdcountry

January 27, 2016

Peter Eichar
Department of Planning and Development Services
County of San Diego
5510 Overland Avenue, Suite 310
San Diego, CA 92123

Re: Borrego Country Club Estates, Project # DS24

Dear Mr. Eichar,

We are full-time residents of Borrego Springs. We are deeply concerned about this proposed amendment to the General Plan. The following issues should be carefully studied in the EIR, many of which I am sure you will hear from others in this community:

Water shortage: As you are aware, the aquifer that provides water for our community is drawing down rapidly. Studies are in process for determining what to do about this crisis. Extending water to a possible 171 homes will gravely exacerbate the problem, and is clearly not compliant with State and County mandates for conserving water resources.

Flood plain: The proposed project is on the slopes of an alluvial plain which is currently stabilized by native vegetation. Grading during development could create significant hazards for adjacent homes. Flood mitigation measures may be destructive to biological resources and may adversely affect adjacent properties.

Biological resources: This is pristine desert, including a beautiful ocotillo forest and provides habitat for numerous desert species. Development will most likely disrupt wildlife corridors that will affect wildlife protected in the nearby State Park.

Archeological resources may be impacted by the project, and by extension of roads and utilities to the project site. Although past flooding has eliminated some resources, artifacts are still found on alluvial areas.

Dark Sky: This is a community that takes pride in keeping outdoor lighting under control to provide a view of the night sky. Scientists and astronomical societies come here to study the stars. Lighting pollution affects the Palomar Observatory. What enforceable controls will be set on lighting of the streets and houses in this development?

Planning issues: This project will result in significant damage to a pristine area of the desert, while numerous already disturbed building sites are available for sale. The County should encourage infill prior to approval of such a project. Due to flood control and biological impacts and County policy will the home sites be clustered and actually be denser than the adjacent existing homes? Will this set a precedent for other plan amendments for denser projects?

Cost/Benefit Analysis: The County should weigh the costs of this general plan amendment to the benefits to the community. At this stage, we see only costs: increased water shortage, destruction of habitat, increased flood hazard with destructive mitigation, possible lighting pollution.

And one has to question: what are the real objectives of this developer? With all the costs incurred to develop this site, is it really viable? Can he really sell the lots and homes? There are many lovely architecturally-unique existing homes available for sale. There are many prime lots that have been on the market for years (many in the adjacent Country Club area). Why? Because building costs are considerably higher than in other areas of the County and market values are considerably lower. Many find that they are unable to sell custom-built homes at a price to even recoup their building costs.

With the costs that this developer will incur in grading, extending roads and utilities, and flood mitigation, it is hard to believe he will be able to recoup his costs. Will this pristine area be destroyed to leave empty streets and lots?

We have to wonder if the developer's real objective is a Rams Hill type of development. Will he come in later and attest that he cannot sell his homes unless some amenities are added and then demand approval for a new golf course and country club, and commercial uses on adjacent land?

We are not golfers but we live in an older golfing community that has made some efforts to conserve water. The course is allowed to go almost completely dry from June to October. Only enough watering is done to preserve the trees during the hot months. Other ways to reduce water use on golf courses are being considered in water resource studies. Until these studies are complete is this a good time to add another dense, water-demanding project?

Finally, many people live here because they enjoy the natural resources and the night sky. We provide support to the State Park through monetary contributions and volunteering. We enjoy the small town laid-back ambience. We do not want to become Palm Springs!

Thank you for this opportunity to comment. Sincerely,

Jana Edwards and Roy Melling,
160 Montezuma Road
P.O. Box 238
Borrego Springs, CA 92004
(760) 294-0140

Steven Forrest
Post Office Box 82
Borrego Springs, CA 92004

SAN DIEGO CA 920

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RECEIVED

FEB 01 2016

Planning and
Development Services

Mr. Peter Eichar
Dept. of Planning + Development Services
5510 Overland Ave, Suite 310
San Diego, CA 92123
3212312385

Steven Forrest
381 Ocotillo Circle
Box 82
Borrego Springs, California 92004
stevenforrest@mindspring.com

Re: Opposition to "Rudyville" in Borrego Springs
January 29, 2016

Dear Mr. Eichar,

I'll be brief here because I am sure you are familiar with all of the strong arguments against the proposed "Rudyville" development on Borrego Springs Road.

In essence, it would be harmful to the environment due to dust, harmful to threatened species, and due to the extreme peril of flash flooding there, physically dangerous to the population of that part of our town. And it robs us of water that we don't have.

That it ruins a very beautiful part of our village is heartbreaking.

And, at a practical level, it seems like a doomed, dumb idea—there are plenty of unsold houses available here, and there is very little employment available. I suspect that if Rudyville goes forward, they'll run out of money when faced with very few sales, declare bankruptcy, and we'll have a half-built ghost town where we once had grace and beauty.

Please protect us from these people!

Thanks.

All Best,



Steven Forrest

Borrego Springs, CA 92004
February 1, 2016

Department of Planning and Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

Attention: Peter Eichar
RE: DS24 Borrego Country Club Estates

Dear Mr. Eichar,

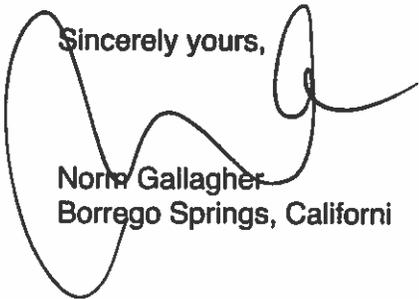
Please deny the request to rezone the DS24 property known as Borrego Country Club Estates. The planned rezone will increase the density of improvements by 100% and create numerous problems that will impact the people, environment and fauna of Borrego, Springs area forever.

As you must already know, water is already a major problem in this remote desert area, largely because of numerous golf clubs, already approved housing developments, and significant agricultural usage. It isn't clear whether the new zone will even be viable given the approval of a Sustainable Groundwater management plan becoming effective this year. This new development will also significantly increase traffic in the vicinity, increase accidents on these small rural roads, and produce noise that many of us moved to the desert to escape.

But the most important reason we request denial is because of our community. Borrego Springs is a small environmentally friendly community of people who take pride in their year round involvement in everything natural and neighbor friendly. Many of us moved here because it is small, tight and friendly, and increasing the load on environmental and human resources through these zone changes is not seen as positive.

This zone change will also change the amount of open space available for the fauna, so abundant here. I occasionally enjoy the sound of an agreeable group of coyotes who stop near my home during the night, or the road runners constantly poking their heads around, or the quail who run their little chick trains along the edges of my property. There is no substitute for living in an area that isn't all concrete and makes no room for the animals with whom we share the space.

Sincerely yours,



Norm Gallagher
Borrego Springs, California

From: [Keith Giebelman](#)
To: [Eichar, Peter](#)
Subject: Borrego Country Club Estates DS24
Date: Sunday, January 31, 2016 1:00:53 PM

Department of Planning and Development Services

Ref: Borrego Country Club Estates
Project DS24

Mr. Eichar

This letter is to voice my opposition to the above project. As a resident of Borrego Springs, I feel this project would not be in the best interest of our community for several reasons. First of all, there are hundreds of existing empty lots, which if built upon, will draw down our depleting aquifer at an increased alarming rate. Next, as you know Borrego Springs has earned the special recognition of a Dark Sky community. A denser rezoning of this project would only add to light pollution, and jeopardize this designation. In addition, the environmental concerns over, water shed, flora, habitat, traffic, etc. dictate that the proposed zoning change would not be beneficial to either the environment or the Borrego Springs community.

Keith Giebelman
707 San Pablo Road
Borrego Springs, Ca 92004
kgiebelman@gmail.com

DS24 Borrego Country Club Estates

We are against the denser housing zone change from 1 house per 10 acres to the dense 1 house per acre. Potentially this beautiful area will go from 17 homes to 171!

As you drive around the Borrego Springs area you will see many homes for sale and many have been on the market for a long while. One spec home has been on the market for 8 years and has not sold yet! If the 17 or 171 homes are built how many will be sold? The developers will probably tell you that all 171 homes will sell. Probably not.

Paved roads, water, power, sewer or a lot of septic tanks will be installed. On the subject of water... how can the county allow this development in our area? Golf and citrus are drawing down our aquifer at an alarming rate. 20,000 acre feet of water is used each year and the recharge rate is only 5,700 acre feet a year. People are doing the best they can to save water at their homes. Adding 17 or 171 homes does not seem logical when our drinking water is leaving us. We cannot do anything to slow down the tremendous amount of water used for commercial purposes because they pump it themselves. But, we can keep more from being used by stopping development of housing projects.

The area where Borrego Country Club Estates is going in is beautiful virgin desert with a forest of wonderful ocotillo and an ancient sand dune. It is a very pretty sight to drive by. Only a few scattered houses further west of this site exist. This site is also in a flood plain and ugly diversion methods will have to be put in place to protect the homes in this estate area. Next to unsightly, land will have to be taken from the owners westward, which will set a precedent, since it has not been done before in our beautiful valley. Also what will happen for sure is excessive lighting in this area. People will leave porch lights on all night and probably the lights on the front of their garages. Who wants to see this happen here? We are a designated Dark Skies Community.

The developers will say that Borrego needs growth, many jobs will be created, and there will be new tax money. We are doing just fine without the lights and traffic for this area. But after they remove the virgin desert to build their homes and abandon the project part way through what will we have? A destroyed desert and it will be something that will affect all of who live here along with tourist visiting the desert because it is beautiful.

If the 171 homes are built will they buy land next to it and put a golf course in too?

17 homes out here in this view shed is way too many and will destroy the beauty of the area. 171 homes built will be sickening.

Bill and Linda Haneline

Borrego Springs

From: [Kerry Hunsinger](#)
To: [Eichar, Peter](#)
Subject: Borregos Rudyville
Date: Thursday, February 04, 2016 5:59:02 AM

Greetings,

I have been a full time resident of Borrego for over 35 years. We don't need another failed development across the street from one that has been through bankruptcy many times since its inception (Rams Hill). We can hardly support the Fire Department we have now and the second one required for this development will only increase the financial burden. This is pristine property that is most likely littered with Native American sites and is a beautiful Ocotillo Forest. Raping it for another failed development while current development struggle to survive is wrong. Borrego is not like other towns and does not grow at the same rate as other areas of So. Ca. Please don't allow this development.

Kerry Hunsinger
PO box 1551
Borrego Springs Ca
92004

Sent from my iPad

From: [Lynn Jennings](#)
To: [Eichar, Peter](#)
Subject: Borrego Springs Development: Country Club Estates
Date: Thursday, February 04, 2016 8:39:09 AM

Dear Mr. Eichar,

I am writing to you today to express my strong concerns regarding the proposed Country Club Estates development in Borrego Springs.

The biggest impact that this dense development would have on the community would be environmental. The development will impact a unique ocotillo forest which now grows on the land. People come to the desert to view its natural beauty and destroying one of Borrego's great assets will not contribute to tourism which is the lifeblood of Borrego Springs.

Borrego's water supply is in a dire situation and threatens the existence of this community. Adding housing built out to this density will only exacerbate the problem. During a recent search on the internet I found that there were hundreds of lots for sale in the area, many of which have been on the market for years. Why do we need to add more?

There are many other reasons that I have to oppose this development which include the dust hazard from construction and grading of the land (including concerns about Valley Fever) and increased traffic to Country Club Road. This proposal simply does not make any sense and I respectfully ask you to reconsider it.

Sincerely,

Lynn Jennings
Borrego Springs

From: [Paul Johnson](#)
To: [Eichar, Peter](#)
Subject: Rudyville development in Borrego Springs
Date: Thursday, January 28, 2016 11:04:43 PM
Attachments: [OcotilloCholla,1205-copy.jpg](#)
[IMG_7345v3jpg-copy.jpg](#)

Dear Mr Eichar

I am a 42 year resident of Borrego Springs and I live in a section of the town called Ocotillo Heights, which is approximately 1/4 mile east of the development know as Rudyville. I understand that you will oversee the approval (or reapproval) of Mr Rudy Monica's 172 acre development and I wish to register my opposition to this project.

The area which is proposed for this project is quite unique within the Borrego Valley. It consists primarily of an old growth "forest" of native ocotillo (*Fouquieria splendens*) which is probably the most spectacular display of this iconic desert plant any where in San Diego County. Ocotillo is a very slow-growing shrub which often reaches heights of 15 to 18 feet. While the plant itself is not rare, such an outstanding population alongside a paved road (Borrego Springs Road/S3) is extremely rare. I have included several photographs of this ocotillo forest as attachments.

The proposed development includes many acres of sandy desert floor. That sand is currently stabilized by the roots and foliage of ocotillo, creosote bush, white bursage, teddybear cholla, beavertail cactus, dyeweed and a wide variety of other desert plant species, nearly all of which are large and beautiful specimens due to the totally undisturbed nature of the property. Development would clear those old-growth speciman plants and de-stabilize the sand. Since I and many of my neighbors live downwind from this area we will be directly in the path of the wind-blown sand. This would have a huge negative impact on the residents of Ocotillo Heights in the form of sand blowing up against house walls, into the houses through cracks in doors and windows, into gardens, and especially into swimming pools. The infiltration of wind-blown sand will inevitably lower the value of the properties and have a negative impact on the life styles of the owners.

I hope you will be able to see the negative aspects of the proposed "Rudyville" development and take the appropriate actions to deny this proposal.

Thank you.

Paul Johnson
3470 Santa Saba Rd (P.O. Box 1555)
Borrego Springs, CA 92004

From: [Fitzpatrick, Lisa](#)
To: [Eichar, Peter](#)
Cc: [Sibbet, David](#); [Lardy, Eric](#)
Subject: FW: "Rudyville"
Date: Thursday, February 04, 2016 4:38:48 PM

From: RUSSELL JOHNSON [mailto:russelljohnson@prodigy.net]
Sent: Wednesday, February 03, 2016 4:05 PM
To: Fitzpatrick, Lisa
Subject: "Rudyville"

Ms. Fitzpatrick,

I had hoped to send this to Peter Eichar but was unable to get his email address. If appropriate perhaps you could forward this to him.

I am writing in opposition to the proposed development in Borrego Springs known as Rudyville. As I understand it the plan is for 172 one acre lots. If you live in Borrego this plan comes off as preposterous. Borrego Springs real estate is slow and depressed as any real estate agent will tell you. According to the MLS and Zillow there are between 123 and 129 properties currently for sale in Borrego. The notion that somehow developing and selling 172 bare lots is reasonable just makes no sense. This is a business plan headed to failure but not before a beautiful Ocotillo forrest is destroyed.

The proposed area at the mouth of Tubb Canyon is the windiest place in a very windy valley. Scraping off the desert to accommodate this sub-division will create dust which will inundate Rams Hill and the homes west of it whenever we have strong winds. The winter and spring winds here are very commonly over 50 mph. One only has to look to the off road area around Ocotillo Wells to see what happens when the desert is laid bare.

Finally, Borrego Springs is in a critical situation pertaining to the aquifer. The community is trying so hard to come to grips with what needs to change to allow for sustainable water supply. To allow a large scale residential development in the valley is to turn a blind eye to the water situation.

Frankly I am astounded that this is even under consideration. Greed cannot win out every time. I urge you to reject this plan as proposed.

Thank you very much for your consideration.

Russell Johnson
398 Big Horn Rd.
Borrego Springs, CA 92004

From: [Robert Keeley](#)
To: [Eichar, Peter](#)
Subject: DS24 Country Club Estates
Date: Wednesday, February 03, 2016 9:05:47 PM
Attachments: [DS24 Feb. 2016.docx](#)

The following letter is also attached as a "doc" file.

PO Box 2433
3466 Country Club Road
Borrego Springs, CA 92004
rhkeeley@earthlink.net
February 2, 2016

Department of Planning and Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123
Email: Peter.Eichar@sdcounty.ca.gov

Attention: Peter Eichar

RE: DS24 Borrego Country Club Estates ("DS24")

Dear Mr. Eichar:

We are homeowners in Borrego Springs. Our home is about 0.5 miles west of DS24. We are very familiar with the site, and generally familiar with the history of the proposed project over the last several years.

We oppose the amendment to the General Plan of San Diego County that would reactivate DS24. We view it as a longshot gamble to profit on the land while visiting a much larger loss on the community as a whole. The purpose of the General Plan is to avoid such ill-conceived ventures, and to facilitate development of attractive, efficient communities that people want to live in. DS24 is asking the county to undo several years of planning, and to restore the prior situation.

The prior situation had Borrego Springs zoned to accommodate a "full-time population of 13,000" (Borrego Springs Community Plan of the San Diego County General Plan, 2011, p. 16. "Plan"). The current full-time population is about 2,700 (Plan, p. 5). The Borrego Springs economy is based on tourism and retirees (Agriculture employs about 75 people full-time, but will diminish over the next decade or two as the water supply becomes progressively more expensive to access.). Future growth depends on having a community that attracts people. DS24 is another step toward the haphazard development that hold back so many desert towns (e.g. Twentynine Palms); it is exactly the kind of development that the Plan tries to prevent in the interest of turning Borrego Springs into a thriving community.

The Plan has a view of making Borrego a more attractive place to visit and locate. Its goal is to grow from today's 2,700 full-time residents to 8,000 (Plan, p. 16). Part of the plan is to discourage development of marginal sites (Plan, p. 16), among them DS24.

Why is DS24 marginal? It is located in a high wind area, by far the windiest part of Borrego Springs. A bit of history: DS24's name, "Country Club Estates," comes from the abandoned section of Country Club Road that borders it. When Borrego Springs began in the late 1940's, the developers put the country club and golf course at the south side of the new town with Country Club Road running along it. They quickly learned that the south side was way too windy for a golf course, and moved it north. The road was never renamed, but its neighborhood developed very slowly. Even today, 65 years after development began, only 39% of the lots are built (212 houses on 549 lots in the tracts within 0.5 miles to the east and west of DS24. By any standard 39% built in 65 years is a development failure—economically and aesthetically.

If development were to begin, it would levy a cost on the community by making Borrego Springs a less attractive place to visit or locate. Borrego would become less attractive to new development in several ways. Among them are

1) DS24 removes a buffer zone with the park, thus detracting from the scenery that attracts visitors in the first place,

2) DS24 makes a mockery of the Plan (anyone who did not like the initial outcome simply requests and gets an amendment to reverse the Plan), thus creating doubts whether future development will be thoughtful per Plan, or random/haphazard/ugly. We are likely to look more and more like other marginal desert communities, and people who doubt the future viability of Borrego Springs are unlikely to spend the \$150,000-\$400,000 needed to build a home here.

3) The frequent high winds at DS24 will stir up lots of dust, if development begins and the currently stable landscape is disturbed.

4) Unless, contrary to our expectation, DS24 succeeds as a development, it will leave one more long-term scar of abandoned land. One of Borrego's negatives today is the number of empty lots and abandoned agricultural lands on the periphery of town. We need to undo that negative, not add to it.

We would close with the thought that at some future time, a few decades hence, the time for development at DS24 may come. Infilling of today's many hundred undeveloped lots (Within just ½ mile west and east of DS24, encompassing only 6% of the area of Borrego Spring, there are 345 undeveloped lots.) may lead to demand on the outskirts, and people may tolerate the wind once they can not locate in the more mild part of town. At that point it could be appropriate to consider developing DS24. Until then we hope you will stay with the Plan that San Diego County so carefully researched and formulated.

Thank you for your consideration of our thoughts.

Sincerely,

Sandra Keeley and Robert Keeley

92004-1074

PETER EICHAR

DEPT. OF PLANS. & DES. SER.

5510 OVERLAND AVE

SUNB 310

SANDUSKI

CARIE

92-123



February 3, 2016

Peter Eichar
Department of Planning and Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123
re: Project No. DS24, "Rudyville"

Dear Mr. Eichar:

We are residents and property owners in Borrego Springs who have grave concerns about the project referenced above. As you know, the current application seeks to amend the General Plan to change the zoning on this parcel, allowing one acre lots and the potential of 171 new residences. This plan is even worse than an earlier proposal for 10 acre lots – which met with widespread opposition. The arguments against the prior application are even stronger today:

1. It would result in the destruction of a majestic ocotillo forest and the resulting negative impact upon both vegetation and wildlife, including endangered species.
2. Destruction of the native vegetation will likely lead to sandstorms, degradation of dunes, air pollution, and an increase in flash flooding.
3. Our already stressed aquifer cannot handle a development of this size and density.
4. There is no need for additional small residential parcels in Borrego Springs and certainly no need for 171 of them. There are empty lots for sale everywhere. These facts should be sufficient to result in denial of the application. But the fact that the taxpayers are paying for the EIR makes this project particularly suspect. We trust that, when all the facts are openly discussed, this project will end up in the recycling bin, where it belongs.

Sincerely,

Tom Lohr, Jim Lohr, Robin Reynolds, Kathy Brigham, Dennis & Debora Stanger, Jack & Helen Hamilton, Clint & Carol Brandin, Cheryl Criss, Delores del Bono, Frank and Barbara Coates, David Lasley, Don Fay, Bob Phillips, Cecelia Kuhn, Julie Nyssen, Kym & Scott McNabb, Liz Carr, Robert Andrews, Bill Herman, Christina Warren, Valerie Rogers, Lorie Young, Kathy Walkenhorst, Betsy Knaak, Bill Haneline, Karen Dege Saunders, Steven Forrest, Gene Wild, Alonso Araujo, Judy Duncan, Thom Keys

Planning and Development Services
5510 Overland Avenue
Suite 310 San Diego, CA 92123
Attention: Peter Eichar

January 31, 2016

Re: Borrego Country Club Estates
Project Number: DS24
aka "Rudyville"

Dear Mr. Eichar:

We were surprised and extremely disappointed to read that the project indicated above is still under consideration and that San Diego County's department of Planning and Development services has issued a notice of preparation of an environmental impact report (EIR). Years ago, when the local community became aware of the proposed project, there were a series of community meetings and actions intended to make the residents and then the county aware of the consequences of development of this land. At the time an EIR was mentioned and we believe it was to be funded by the developers.

Now it seems it is the tax payers who will be funding the study. We are not quite sure how that change came about. Whoever funds the EIR, it is, in our opinion a grave mistake to go forward with the project and, now, a waste of taxpayers' money to do the EIR.

Development of this property would be an environmental disaster for several reasons:

1. It is in a flood plain and could potentially lead to significant consequences if there were residential development of the land... and flooding.
2. Building would require scraping of the berm or sand dune on the land which would cause significant sand/air pollution in the whole valley. The prevailing winds are from the west and the homes to the east of the berm would be inundated with blowing sand. We are well aware of the strength of the winds in this valley having had 600 square feet of roof blow off and over the house a few years ago; the next year the wind completely destroyed a shed. This is not a place to scrape the vegetation off a tract of land and leave it exposed to the wind.
3. There are a variety of desert plant species to be found on this property that would be eliminated including a wonderful old ocotillo forest. Ocotillo is a species unique to the Borrego valley. A 1950's map for tourists shows the ocotillo forest as a feature to be visited. The forest is still there and would be decimated, if not totally destroyed, if Borrego Country Club Estates goes ahead. (We sent a copy of the tourist map to the county during the first round of the community's consideration of this project and may well still be in your records.)
4. Borrego has significant water problems. The aquifer is shrinking at an alarming rate. It is well documented that we annually consume four times more water than is going back into the aquifer yearly... and this project would most likely not conform to the yet to be promulgated requirements of Borrego's Sustainable Groundwater Management Act.

Furthermore, there is currently a surplus of residential lots available in and around Borrego. The provision of 172 more lots is unnecessary.

One wonders if the relationship one of the project's principals has with Supervisor Bill Horn is a factor in keeping this ill thought out, unwanted and devastating project alive.

Lastly, some years ago there was a cartoon in the local paper (the Borrego Sun) depicting the community's feeling to the decision to terminate the project. It showed two rabbits looking at a man digging up a grave with a headstone saying Rudyville RIP. One rabbit is asking, "What's he digging up? The other rabbit replies, "Rudyville and I wish it would stay buried." Now for some thoughtless, self-serving reason it is being considered for resurrection. Please be rational and reconsider.

Respectfully,

Saul L. Miller Ph.D
Laara K. Maxwell Ph.D.

Homeowners - 3363 Broken Arrow Road
Borrego Springs, CA 92004

760 767 5496
P.O. Box 1763
Borrego Springs
CA 92004

Planning and Development Services
5510 Overland Avenue
Suite 310 San Diego, CA 92123
Attention: Peter Eichar

January 31, 2016

Re: Borrego Country Club Estates
Project Number: DS24
aka "Rudyville"

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Respectfully,

Saul L. Miller Ph.D
Laara K. Maxwell Ph.D.

Homeowners - 3363 Broken Arrow Road
Borrego Springs, CA 92004

760 767 5496
P.O. Box 1763
Borrego Springs
CA 92004

*P.S. Please see above-mentioned cartoon,
published in The Borrego Sun,
enclosed. Thank you*

Bunny & Hare

Rudville +
I WISH IT WOULD
STAY BURIED
WHAT'S
HE DIGGING
UP?

SATL
MILLER



BORRERO Sun Newspaper

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Planning and
Development Services

Department of Planning & Development Services,
5510 Overland Avenue
San Diego, CA 92123
Suite 310
0-650

Attention: Peter Eicher

9212391239 0021



From: [Jim Neuman](#)
To: [Eichar, Peter](#)
Subject: RE: Borrego Country Club Estates, Project DS24
Date: Tuesday, January 19, 2016 11:22:33 AM

Dear Mr. Eichar - I am writing to express my views regarding the proposed project referenced above. If approved and implemented, this project would have serious detrimental impacts on the Borrego Springs community, as summarized below.

(1) - It is well known that the ground water supply in the Borrego area is in serious overdraft. To approve a large development project in the face of this critical challenge simply doesn't make sense.

(2) - The proposed project is in a flood plain. Mitigation of this problem would require the taking of private property for the sole benefit of the developers.

(3) - A need to create more residential lots in Borrego Springs does not exist, as there is already an ample supply.

(4) - The subject property is home to numerous endangered species, as well as an ancient ocotillo forest.

Thank you for your consideration of these issues.

Jim Neuman

From: [dennis nichols](#)
To: [Eichar, Peter](#)
Subject: Borrego Country Club Estates DS 24 Comment Letter
Date: Thursday, February 04, 2016 10:27:40 AM

Subject: Borrego Country Club Estates DS 24 Comment Letter

Dept of Planning and Development Services: We are writing to submit our opposition to the proposed development in regard to Rudyville in Borrego Springs. We agree with all points raised by the Tubb Canyon Desert Conservancy as published in the Borrego Sun Newspaper published Jan 14th, 2016 page 7. However, we had the impression that the previous study resulted in not allowing any development to said property. We want to voice our opinion that we are against any development. We have a ongoing water supply crisis that would be only worsened by adding more homes. We have a large number of unsold homes and lots already in the valley not being sold because of our water issues. Come see the beautiful Ocotillo Forest and Sand Dune that would be destroyed just to financially benefit a small group of investors and effectively reduce current property owners values. We urge you to consider this proposal carefully and respect the wishes of the residents of our unique community by blocking any development at this site. Respectfully submitted, Dennis & Carmen Nichols 3060 Broken Arrow Road P.O. Box 2271 Borrego Springs CA 92004 (619)869-6182

From: desertstar2000@gmail.com
To: [Eichar, Peter](#)
Subject: Borrego Country Club Estates
Date: Tuesday, February 02, 2016 11:50:47 AM

Hello ~

I am writing to comment on the possibility of the Borrego Country Club Estates Development (AKA "Rudyville") moving forward in Borrego Springs. I am very much opposed. I do hope my opinion matters. I have lived in Borrego springs for 30 years. A development of homes in Borrego Springs makes no sense, especially right now. There are 100's of undeveloped lots for sale in Borrego right now. No one is buying them. It is currently questionable if our water source is sustainable. The last thing we need are more water users. But that is the main reason that these Lots ~ ARE NOT SELLING!

This proposed site sits in a flood plain.

Flooding is a constant issue in the desert.

I live downwind of the proposed building site. It would cause air contamination from dust whenever the wind blew. And the wind is always blowing in Borrego Springs!

My greatest fears are that the proposed site will be cleared and:

1. Destroy the Ancient Ocotillo Forest that has been there for hundreds of years and the ecosystem that surrounds it and the animals that rely upon it will also be wiped out.
2. The builders will let this now scarred and naked land lie dormant for years while they try to sell these lots and gather funds and permits to build.

(Selling these lots will be next to impossible due to the water shortage in the valley)

3. Since the Ocotillos and other plants have been destroyed and the land cleared, Flooding

will send acres of dirt onto other folks
developed lots and into homes. Lots of law
suits there will follow.

This development just makes no sense. Please
do not let it move forward!

Please let me know that you received my
letter.

Thank you,

Kathy and Earl Pratt

Owners/Operators

Earl's Pest Management

Borrego Springs Residents for 30 + years.

(760) 767-4446

From: [Rob Raney](#)
To: [Eichar, Peter](#)
Subject: Opposing Rudyville
Date: Thursday, February 04, 2016 10:31:18 AM

Dear Peter Eichar,

There are a number of reasons my wife and I oppose the Rudyville Development. Looking around our community there are so many vacant and incompleted developments. It reminds one of developments you see while visiting in Mexico. Streets, curbs and street light go in then it just sits for years and years.

The area in question has a pristine iconic forest of ocotillo that would be wiped out. Leaving barren land to be wind swept. Scouring our desert floor for years to come. The winds howl down these mountains. Our air pollution will seriously be impacted.

We are all impacted by our water shortage. We save our gray water for outdoor watering. Now, in our face flies further development plans where we've been taught we have no water to give. We are trying to understand but we are at a loss.

As residents of Borrego Springs we oppose the development of Rudyville, again. For the same reasons we opposed it last time.

Thank You

Rob and Sandy Raney
3243 Country Club Rd
Borrego Springs, Ca. 92004

From: [Peter B. Reiner](#)
To: [Eichar, Peter](#)
Subject: RE: Borrego Country Club Estates
Date: Wednesday, February 03, 2016 6:41:54 PM

Dear Mr. Eichar:

I am writing to express my concerns about the impact of the Borrego Country Club Estates proposal (Project number DS24) which is currently being considered under the auspices of an Environmental Impact Report.

It is my understanding ([Borrego Sun](#), Jan 25, 2016) that the proposal involves a change of zoning of this 171 acre parcel from one house per 10 acres to 1 house per acre, a ten-fold increase in density. I am not an expert, but it does not take an expert to recognize the negative environmental impact that developing this piece of land would have on the delicate desert environment here in Borrego Springs. Of the many issues of concern, here are the four that stand out for me:

- The increased density would result in substantial disruption (if not eradication) of the spectacular ocotillo forest on this parcel; such forests grow extremely slowly and I see no way that the development could go forward without significant damage to this pristine ecosystem. Forests such as this are increasingly a tourist draw for Borrego Springs, and as you know, tourism is the lifeblood of the town.
- Given the water woes of the Borrego Springs community, it is not clear how increasing the density in this manner is consistent with the obvious mandate of water conservation.
- In a community where there is an excess of housing inventory as well as many, many empty lots for sale, increasing the density on this particular parcel is not logically defensible.
- There is a large sand dune on the property that would require grading; this would cause a dust hazard for neighbours such as myself.

I fully support sustainable development when it makes sense, and I have never in my life written to complain about a development permit. However, after considering the issues, I strongly feel that approving this rezoning plan is a serious mistake, and implore you in the strongest possible terms to reject the proposal.

Thank you for your work on behalf of the residents of Borrego Springs.

Sincerely,

Peter B. Reiner

Peter B. Reiner
322 Slash M Road
Borrego Springs, CA 92004

From: [Norman Shinabargar](#)
To: [Eichar, Peter](#)
Subject: Project DS24 Borrego County Club Estates
Date: Saturday, January 16, 2016 1:29:12 PM

WOW! The taxpayers will be paying for yet another EIR impact report as planned by notice of San Diego County Department of Planning and Development Services! This is at the behest of San Diego Board of Supervisors to amend the general plan? What is wrong with the board of supervisors when water is already a great issue of the aquifer overdraft in Borrego? There are many properties and empty lot that are available for ownership!

Do I suspect an insider doing someone a special favor for a friend (i.e..Rudy Monica and Chris Brown) a former staff member for supervisor Bill Horn???

Why do the elected officials, after getting into office, forget that they are to protect people and land? NOT show favoritism to select people? Maybe this is a cause of losing voter? Thank you for your attention to this matter! A Borrego Resident

From: [ewarren](#)
To: [Eichar, Peter](#)
Subject: Rudyville, Borrego Springs
Date: Wednesday, January 27, 2016 4:34:22 PM

As a longtime resident of Borrego Springs, I'm writing to express my strenuous objection to the

development of the proposed community known as "Rudyville" in Borrego.

Could there possibly be a more disastrous idea--both for Borrego Springs, Anza Borrego State Park, and potential residents of Rudyville itself?

Borrego Springs is characterized by severely limited water resources worsened by continuing drought conditions, extreme wind and sandstorms in Tubb Canyon and all of Borrego, frequent flooding, and a town whose limited resources simply cannot support greater population density.

The environmental concerns alone are alarming--primarily the prospect of destroying 172 acres of precious and pristine Ocotillo forest, along with the issue of dust and sand raised in the process.

Not to mention that the Borrego Springs housing market is depressed, has been for several years, and shows no significant signs of rebounding anytime soon. Where is the rational thought behind a proposal to build new housing on 172 individual acre lots?

How dismaying it is--and yet predictable--to learn that the man behind Rudyville, Rudy Monica, is a former staff member for SD County Supervisor Bill Horn. This is really sorry news that smacks of governmental cronyism and corruption. What else could justify such an illogical and destructive plan, designed only to fatten the bank accounts of developers, without regard for larger issues.

Please do not let Rudyville move forward!

Alexa Rhodes

From: [Randall Ricketts](#)
To: [Eichar, Peter](#)
Subject: Borrego Country Club Estates
Date: Saturday, January 23, 2016 10:46:01 AM

As property owners in Borrego Springs we are against the proposed zoning change for borrego springs country club estates (DS24). That property lies within a unique and sensitive ocotillo forest flood plain and development at one home per acre would not be in keeping with surrounding area and would greatly increase traffic on country club road. The beauty and openness of this unique habitat should be preserved.

Randall Ricketts
Borrego Springs Ca

Sent from my iPhone

04 February 2016

Attn: Peter Eichar
Department of Planning and Development Services
5510 Overland Ave. Suite 310
San Diego. CA 92123

Regarding the proposal concerning PSR ID DS24, Borrego Country Club Estates, I am opposed for the following reasons:

1. This project will not be in compliance or follow the guidelines of the County General Plan. The General Plan directs future growth in the unincorporated areas of the County that reflects the County's commitment to a sustainable growth model that facilitates efficient development near infrastructure and services, while respecting sensitive natural resources and protection of existing community character in its extensive rural and semi-rural communities.

This project is not close to any infrastructure or services, would require the removal of an ancient ocotillo forest, and require more roads to be built and maintained.

The community currently does not meet the emergency vehicle response time in some areas. No new construction should be allowed, until this situation is remedied.

2. If the project is approved and the land cleared of all vegetation, the increase in dust would be a health hazard due to valley fever, asthma and allergies. The strong winds, which are often and mostly from the west would cause enormous amounts of dust and sand to be made airborne, thus affecting all the residences that lay east of the project. This would also be an environmental disaster. This is clearly seen by the huge increase in dust and sand from the recently installed solar farms, where the land was cleared of all vegetation.

3. The 2015 USGA Report suggests that we may have only enough water in our aquifer to last until the year 2060. A mere 45 years. Adding another 170 residences to the valley will not help that situation in any way and is hard to imagine.

3. This project sits right in the middle of a flood plain. There is ample evidence (scarring in the desert floor from heavy rain two years ago) that shows the water from Grapevine and Tubb Canyons do merge and flow right thru this proposed project.

4. These vacant lots are not needed. There are currently hundreds of vacant lots already for sale in the valley that still have their vegetation on them.

5. There are possible endangered species on the property, including burrowing owls.

6. Most Borregan's do not want this project approved. It does nothing for the community, and only enriches the property owners at our expense. (Loss off quiet, more noise and dust.)

Cont. PSR ID DS24, Borrego Country Club Estates

Respectively submitted.

Gary Saunders
3333 Lapped Circle Dr.
Borrego Spring, CA 92004

From: [Beth Shugan](#)
To: [Eichar, Peter](#)
Subject: DS24 Borrego Country Club Estates Rezoning
Date: Monday, February 01, 2016 8:39:41 PM

Borrego Springs, CA 92004
February 2, 2016

Department of Planning and Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

Attention: Peter Eichar

RE: DS24 Borrego Country Club Estates

Dear Mr. Eichar,

I own a home in Borrego Springs, California, and I am writing to ask that the County of San Diego deny the request to rezone the DS24 property known as Borrego Country Club Estates. This property backs up to my home and will greatly impact my life and the life of my community if it is allowed to be developed at the density being requested with the rezoning. The ancient sand dune is shifting now; increasing the density of houses for this property will exacerbate the movement of the dune. Our house already has cracks developing as the dune shifts. In addition, with increased housing density, the grading necessary for these buildings will also affect the flooding channels that currently pass throughout the area.

Of major concern, however, is the impact on the air quality in Borrego Springs due to blowing dust, plus the very serious water issues that Borrego Springs is facing. Our community is already reeling with dust storms due to local development and clearing of lands for the solar farms. Clearing more lots and creating more streets in the Borrego Country Club Estates will only increase this problem. Borrego Springs is grappling with dire water predictions that make large scale developments unfeasible, and cannot conform to the requirements of the new Sustainable Groundwater Management Act that went into effect this year.

The viewshed of my neighborhood looks directly on this beautiful parcel consisting of ancient dunes and an "old growth" ocotillo forest. It is an undisturbed parcel in our beautiful desert, home to multiple endangered species, and deserves to be protected. If the zoning of this parcel is changed to one house per acre, it will scar this area permanently.

On behalf of the citizens of Borrego Springs, I am urging the County of San Diego to deny this request for rezoning. Please help protect our fragile ecosystem from large scale developments.

Sincerely yours,

Beth Shugan
Borrego Springs, California

PO Box 2459
Borrego Springs, CA 92004
February 1, 2016

Department of Planning and Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

Attention: Peter Eichar
RE: DS24 Borrego Country Club Estates

Dear Mr. Eichar,

I am a resident of Borrego Springs, California, and I am writing to ask that the County of San Diego deny the request to rezone the DS24 property known as Borrego Country Club Estates. This property backs up to my home and will greatly impact my life and the life of my community if it is allowed to be developed at the density being requested with the rezoning. The viewshed of my neighborhood looks directly on this beautiful parcel consisting of ancient dunes and an "old growth" ocotillo forest. It is an undisturbed parcel in our beautiful desert, home to multiple endangered species, and deserves to be protected.

If the zoning of this parcel is changed to one house per acre, it will scar this area permanently. Developing this parcel at such a density will also greatly impact the air quality in the Borrego Springs area. Borrego Springs is already reeling with dust storms due to local development and more lots and streets will exacerbate this problem. Additionally, Borrego Springs is grappling with water issues that make large scale developments unfeasible, and cannot conform to the requirements of the new Sustainable Groundwater Management Act that went into effect this year.

On behalf of the citizens of Borrego Springs, I am urging the County of San Diego to deny this request for rezoning. Please help protect our fragile ecosystem from large scale developments.

Sincerely yours,

Connie Spears
Borrego Springs, California

**LORI L. STAEHLE PAUL & ROBERT L. STAEHLE
153 JAXINE DRIVE
ALTADENA, CALIFORNIA 91001**

Co-owners of San Diego County APN #198-320-14, #198-320-15 and #198-320-28

2016 February 4

County of San Diego
Planning and Development Services
Peter.Eichar@sdcounty.ca.gov
Kevin.Johnston@sdcounty.ca.gov
5510 Overland Avenue #310
San Diego, California 92123

Re: Public comment responding to the Notice of Preparation (NOP) for a Subsequent Environmental Impact Report (SEIR) to analyze impacts associated with the Property Specific Requests (PSRs) General Plan Amendment and Rezone (GPA 12-005; REZ 14-006).

Specifically concerning Property Specific Request (PSR) Desert Subregion 24 (DS-24):

APN# 198-320-01

APN#198-320-26

to change above parcels of undeveloped desert from Semi-Rural SR-10 to Semi-Rural SR-1 zoning under the current San Diego County General Plan

Dear Messrs. Eichar, Johnston, and Planning Staff,

As owners of record for three parcels near the subject APNs, ourselves and our property values would be negatively impacted by the proposed zoning and land use change to increase density of development on approximately 172 acres of natural desert encompassed by Property Specific Request DS-24. The requested zoning change from low density SR-10 to high density SR-1 is contrary to the County General Plan adopted for this area on August 3, 2011. Because the proponents had no active development application on record at the time the new General Plan was approved (and certainly no approval for any subdivision plan), we strongly object to the County giving any special treatment to the persons who propose to develop the subject parcels.

Further, whether or not they might have had an active request "in the system," we strongly object to the proposed County approval of development plans on the DS-24 site because of the negative impacts this would impart, including but not limited to:

1. Degradation of the semi-rural character of the zone surrounding Anza Borrego Desert State Park. It was precisely this semi-rural, open space character that the reduced density approved in the new General Plan was intended to preserve.

2. Dust, molds, and other fine particulate pollution will be added to the air in large quantities for many days of the year if the stable sand dune and a large ocotillo forest are removed from the DS-24 site, thereby degrading air quality and threatening public health. The developers plan to grade 170+ acres, scraping off native vegetation and biotic soil crust and using the existing old sand dune on the site as fill to create elevated vacant lots they hope to sell. This plan would dramatically increase the load of windborne dust, molds, and other fine particulates that will irritate our lungs and eyes and those of our co-owners, our guests, neighbors in the region, and tourists. The subject parcels are located in an area of known frequent high winds, often >50 mph.
3. Dark sky is one of the rare resources that brings many people to the Anza Borrego Desert. It is one of the significant reasons we value the desert. Unlike more populated parts of Southern California, the Milky Way galaxy in which our Solar System resides can be clearly seen on the usually-cloud-free nights. Increasing the residential density will increase background lighting in ways that degrade the dark night sky, especially when there is windblown dust in the air (see #2 above). The proposed increase in development density will counter efforts by Borrego Springs that have earned us an official Dark Sky designation (see <http://darksky.org/idsp/communities/borregosprings/>), as the second Dark Sky Community in the United States after Flagstaff, Arizona. Just as Flagstaff is located near Lowell Observatory (from which Pluto was discovered), Borrego Springs is located in the dark skies near the historical and still fully-utilized Palomar Observatory. The economy of Borrego Springs is enhanced by the astronomers and other visitors who specifically come here to see dark skies and clear, scenic desert views.
4. Traffic in close proximity to Anza-Borrego Desert State Park south of the Borrego Springs community proper would be dramatically increased if DS-24 is changed to SR-1 zoning, first during construction, and then as people occupy new residences. Traffic will increase noise, toxic exhaust, particulates thrown up by diesel engines and tires, and noise pollution. Traffic at night will further degrade Borrego Springs' dark sky resource and the attraction this holds for astronomical event tourism that helps support many local businesses.
5. Species diversity and biological resources will be greatly diminished and the natural environment degraded if the PSR for DS-24 is approved. Under the 10-acre minimum parcel size designation carried for the subject parcels in the new General Plan, there would be sufficient space between any eventual residences to retain natural vegetation and the wildlife that depends upon it. Higher lot density and the need to grade the stable sand dune to meet lot elevation requirements would ensure that most or all original native vegetation would be removed from the site, which in turn would virtually eliminate natural habitat for the numerous species of resident and migratory birds, amphibians in areas of periodic water, reptiles, mammals, abundant butterflies, and many species of annual and perennial wildflowers. After sufficient rain, the site can come alive with carpets of spectacular blooms.

In addition to habitat destruction, increased human activity in the higher-density setting would eliminate many significant species for which the site is home or forage or hunting range, including:

Burrowing Owls (*Athene cunicularia*, a California Species of Special Concern) who have active burrows on the site. Populations of these owls are in decline, largely from habitat loss to development as well as pesticide use, making the existence of this species on the DS-24 parcels an important consideration.

Flat-tailed Horned Lizard (*Phrynosoma mcallii*, a California Species of Special Concern) have been observed on the subject parcels. High density housing usually results in the introduction of foreign Argentine ants that kill native ant species and radiate out into the local environment. Horned lizards (including Flat-tailed, Desert, and Sand Diego Coast horned lizards) cannot eat Argentine ants, which results in extirpation of these native lizards around housing subdivisions. Such an occurrence so close to the State Park and wilderness areas is of serious concern.

Colorado Desert Fringe-toed Lizard (*Uma notata*, a California Species of Special Concern) has been seen on the DS-24 parcels in the sandy dune area adjacent to unpaved Country Club Road. The pristine desert habitat, including the old sand dune, large ocotillo forest, and desert stream bed on the subject parcels supports an incredible diversity of desert lizards, including the striking-looking Western Whiptail (*Aspidoscelis tigris*), Zebra-tailed Lizard (*Callisaurus draconoides*), and Long-nosed Leopard Lizard (*Gambelia wislizenii*), among many others. Snakes are also present in abundance, including the spectacular Red Diamondback Rattlesnake (*Crotalus ruber*), Northern Desert Nightsnake (*Hypsiglena chlorophaea / torquata deserticola*), and recognizable light and dark banded California Kingsnake (*Lampropeltis / getula californae*), etc.

Tubb Canyon Bajada and vicinity, including the natural habitat on the DS-24 site, receive occasional visitations by endangered **Peninsular Desert Bighorn Sheep** (*Ovis canadensis nelsonii / cremnobates*), which is a federally listed Endangered Species. Hoof prints of these Bighorn Sheep have been seen on an adjacent parcel as recently as December 2015. Endangered Bighorn Sheep may utilize the subject parcels for seasonal forage, especially during periods of drought. DS-24 parcels are located on the boundary of designated “critical recovery habitat” for the Peninsular Desert Bighorn Sheep. It is possible that future study data will result in extending critical habitat for this endangered species to include alluvial fans and desert riparian water sources that may provide the sheep with additional forage and drinking options during prolonged drought. Such adjustments to critical habitat boundaries have occurred in the past.

6. Noise will dramatically increase during grading and construction, and will remain a nuisance once new parcels are occupied, disturbing on adjacent parcels their owners’ quiet enjoyment and negatively impacting their property values as too many new residents move into the proposed development area so close to the recreational lands and habitat within the adjacent State Park and wilderness areas.
7. Recreational value and aesthetics of the area south of Borrego Springs, including the rugged Tubb Canyon outflow area, will be diminished by destruction of the ancient Ocotillo Forest (*Fouquieria splendens*) and associated rare natural ecosystem that presently occupies the subject

parcels. Every spring these parcels are part of one of the largest unbroken Ocotillo Forest blooms that is easily viewed and accessible from public roads. Most years, this bloom is so intense as to create for a few weeks an astonishing “haze” of brilliant red just above the ground that is part of the wildflower spectacle that thousands of tourists come from all over the world to see.

8. Property values of neighboring parcels will decline, including those in which we share ownership, as result of all the above deleterious effects of the proposed development. The new General Plan enforced the long-standing status quo of low density surroundings that made parcels near the State Park attractive. The proposed action, filed as an active project *after* adoption of the new General Plan, would take value away from us that was intended to be protected by the General Plan, in order to line the pockets of the developers and those politicians whose campaigns they fund.
9. Illegal taking of our property has long been planned by the owners and developers of DS-24 in order to construct extensive, unsightly, environmentally damaging, and costly flood control structures, including a concrete dam “built to federal standards,” additional diversion dikes and channels running east-west along Tubb Canyon Road, and additional debris basins at the mouths of Tubb and Dry Canyons. These flood structures would be built on our land and that of several neighbors. This flood control system has been designed to enable the development of the DS-24 site in a hazardous flood plain at the cost of other, preexisting landowners. It is the most insidious and ominous element of the proposed high-density subdivision of vacant lots located on what is currently pristine desert.

During past extensive discussions and briefings, including proposed tract maps, about the proposed “Borrego County Club Estates” subdivision on the DS-24 parcels over many years, notably at the Borrego Springs Sponsor Group and with neighbors, this massive flood control system of dikes, dam, and basins *was never mentioned by Rudy Monica or other owners of the site.* The flood control plan, and proposed “Geologic Hazard Special Assessment District” to fund its construction, was found buried in County records researched by Lori Paul and neighbor, Ann Irwin, and brought to light back in 2008. It shocked all affected landowners, the Sponsor Group, State Park staff, and raised even greater public opposition to the project that has become commonly known as “Rudyville.”

Refer to the following developer’s report for details along with past TM5487 “Borrego Country Club Estates” Flood Hazard Evaluation documents and plans:

“Flood Hazard Evaluation – Borrego Country Club Estates – Borrego California”

Prepared for Mr. David S. Davis, Carlsbad, California

by Walter F. Crampton, Principal Engineer

R.C.E. 23792, R.G.E. 245

Terra Costa Consulting Group, Inc., San Diego, California

August 27, 2007

The report repeatedly refers to “...the County’s 2,700-foot-long-dike [emphasis added] in the headwaters of Culp-Tubb Canyon.” The old, earthen diversion dike built on our property and that of other neighbors was not, as stated, constructed by San Diego County. The County does not own or maintain that dike, it is on private property and was constructed decades ago as a temporary dirt levee by the U. S. Army Corps of Engineers. Currently, the main dike and small sub-dikes to the northwest are naturalizing by erosion and revegetation. Furthermore, burrowing owls reside on the east side of the old dike berm. We have no intention of allowing any alternation in that dike which is returning to its natural state.

The massive concretized flood control system proposed by the owners of DS-24 includes: A concrete “5600’ +/- OFFSITE DIVERSION DIKE TO BE CONSTRUCTED” as featured in a map dated 05/18/07 [month slightly illegible on reduced paper copy], so may be different], titled “DRAINAGE EXHIBIT, REGIONAL DEVELOPED CONDITIONS, BORREGO COUNTRY CLUB ESTATES,” prepared by Stevens-Cresto Engineering, Inc., and submitted to San Diego County for “TRACT 6487-RPL1”. This map, copy attached in east and west halves, shows a “4000’ +/- DIVERSION DIKE TO BE RETRO-FIT” crossing our parcel APN #198-320-28, and the “Proposed Diversion Structure” downslope of that to be inside the Anza-Borrego State Park Boundary, and to run alongside our land, impinging on our parcel APN #198-320-15.

The map notes state that this structure is to render a portion of the proposed development “TO BE REMOVED FROM FLOOD ZONE ‘AO’ ”; AO being a zone determined by the Federal Emergency Management Agency (FEMA) to be subject to periodic significant flooding that threatens structures.

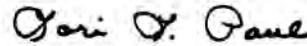
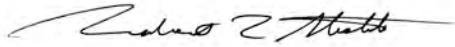
A preferred alternative involving the above flood control structures, includes excavation of catch basins at the base of Tubb Canyon and Dry Canyon, also on private property and possibly impinging on the State Park.

The land for these highly intrusive flood control structures is not owned by either the developers or the County, nor are there recorded easements that could be utilized for such structures. Thus, the required property would need to be seized from us, our co-owners, and our neighbors by eminent domain. Elsewhere there is a description for how the developers intend to secure support from elected officials to create a new special assessment district that would tax us, our co-owners, neighbors and others, in effect so that these developers could profit from illegally taking our lands for a project that should never be built in the first place.

This travesty is, fortunately, prohibited by the new General Plan; therefore, on this basis, in addition to other germane concerns, no Project Specific Request should be approved for DS-24 (aka “Borrego Country Club Estates,” known locally as “Rudyville”).

For all these reasons, we oppose the proposed project for the DS-24 site. We therefore request that San Diego County suspend any and all actions taken in support of increasing the permitted housing density, or any other proposed use change with the exception of reduced density or conservation protection, from the present undeveloped land on APN #198-320-01 and #198-320-26.

Thank you,



Attachments: East and West halves of map dated 05/18/07, titled "DRAINAGE EXHIBIT, REGIONAL DEVELOPED CONDITIONS, BORREGO COUNTRY CLUB ESTATES," prepared by Stevens-Cresto Engineering, Inc., and submitted to San Diego County for "TRACT 6487-RPL1".

D.C.-1
63.4

D.C.-2
259.7

SEE EXHIBIT D-2

L.P.
NODE 42

LEGEND

PROPOSED GRADE CONTROL
300' ———— DIKE
300' ———— INTERMEDIATE
EXISTING GRADE CONTROL
300' ———— DIKE
300' ———— INTERMEDIATE

DRAINAGE BASIN DELINEATOR
A — BASIN DELINEATOR (ALPHA CHARACTERS SEPARATE REGIONAL RUNOFF AREAS)
0.57 — ON-SITE BASIN AREA (Acres)

DRAINAGE BASIN BOUNDARY

PROPERTY LINE

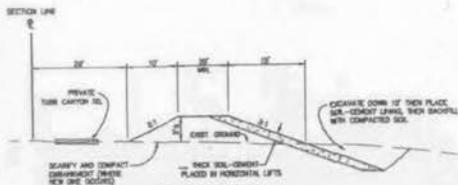
RUNOFF/CHANNEL FLOW DIRECTION

FEMA 100-YEAR FLOOD ZONE

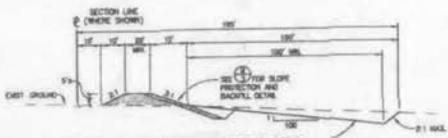
10' PATH FOR EFFECTIVE SCOPE



EXISTING DIVERSION DIKE RETRO-FIT (A) D-1
NO SCALE



DIVERSION DIKE SOIL-CEMENT SLOPE PROTECTION (B) D-1
NO SCALE



DIVERSION DIKE GRADING (C) D-1
NO SCALE



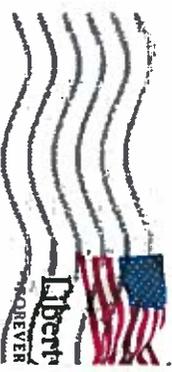
PROPOSED F.I.R.M. REVISION
TO LIMIT FLOOD ZONE "A0"
TO SOUTH SIDE OF PROPOSED
DIVERSION STRUCTURE

5600'± OFFSITE DIVERSION
DIKE TO BE CONSTRUCTED

Paul & Angela Stratton
P.O. Box 2610
Borrego Springs, CA 92004

SAN DIEGO CA 920

01 FEB 2016 PM 3 L



Attn: Mr. Peter Eichler

Dept. of Planning & Development Services
5510 Overland Ave. Suite 300
San Diego, CA.
92123

RECEIVED
FEB 04 2016

Planning and
Development Services

92123123585



PAUL & ANGELA STRATHAN

P.O. Box 2610

3339 El Tejon Rd.

Borrego Spgs. CA.
92034

Subject: Project # DS24

(Borrego Country Club Estates)

Mr. Eichler, my wife and I have lived in Borrego Springs for over 20 years. Our house is just east of the project site. There are a number of concerns we have about a project of this size.

1. Borrego Springs has a very limited single source of water underground with a huge yearly overdraft.

To develop this land in view of this problem would not be in the best interest of our town or any future residents.

2. The development of a beautiful raw desert with a fabulous Ocotillo forest would be a scar in this valley. People visit from San Diego, L.A. and all over the world to enjoy the natural beauty of this special place.

3. Bozeng Springs WAS overdeveloped
MANY years ago AND currently has hundreds of
lots AND thousands of acres that have not sold.

We ARE AGAINST the proposal to
change zoning in the General Plan
Regarding this project.

THANKS
Paul & Angela Stratton

[Signature]
Angela A. Stratton



From: [Elena Thompson](#)
To: [Eichar, Peter](#)
Subject: Borrego Springs Rudyville
Date: Thursday, January 21, 2016 5:11:56 PM

Hello Peter,

As residents of Borrego Springs and Encinitas, we can assure you that for the County to entertain any plans or discussions at this juncture for zoning changes in Borrego Springs would be total insanity, as would be any discussion of entertaining permits for new housing tracts.

There is a dire water shortage in Borrego Springs and making any zoning changes at this time must be put on HOLD. Please, STOP moving forward on any plans that encumber the future water supply in Borrego Springs, until the County and State of CA. can first come up with a solution to the shortage of water. Further, any rezoning of precious land of this kind, when you could keep your eye on already, previously farmed land, is where the focus would need to be going forward. Not on virgin land, plain and simply. We do not need to create more dust under any circumstances or denigrate any new land such as the rare land now being eyed by developers of Rudyville.

We are counting on the County of San Diego to be a partner and do the right thing here.

Kindly confirm receipt of this email thanks.

Thank you,

Elena and JohnThompson

Office-Direct: 760.822.3873

Johnston, Kevin

From: Elena Thompson <elenathompson@cox.net>
Sent: Thursday, December 17, 2015 1:05 PM
To: Johnston, Kevin
Subject: Property Specific Requests General Plan Amendment - Borrego properties PUBLIC COMMENT
Attachments: NOP documentation - PSRs GPA_TimeExtension.pdf

Hello Kevin,

Please get this public comment in for the record if you could thanks,

WE ARE FIRMLY AGAINST ANY LAST MINUTE MODIFICATIONS TO THE GENERAL PLAN THAT CALL FOR ANY KIND OF ZONING CHANGE HERE FOR BORREGO SPRINGS.

THIS WOULD NEED TO BE FULLY VETTED WITH AMPLE PUBLIC NOTICE, FAR BEYOND THIS NOTICE NOW, FOR A ZONING CHANGE OF THIS KIND.

THANK YOU! ELENA AND JOHN THOMPSON
ENCINITAS AND BORREGO SPRINGS



HAPPY HOLIDAYS!!

Elena Thompson, "E.T.", Realtor
John Thompson, "J.T.", Broker
Office-Direct: 760.822.3873
INDIAN HEAD, BORREGO SPRINGS

San Diego Real Estate Sales and Investments since 2000! We love your referrals! Thank you for thinking of us!



Ms. Eliz Thompson
PO Box 2684
Borrego Spgs, CA 92004



SAN DIEGO CA 92101

26 JAN 2015 PM 2 L

RECEIVED
JAN 29 2015



Department of Planning and Development Services

Attn: Peter Eichar

5510 Overland Ave, Suite 310

San Diego, CA 92123

Re: DS24

92123123985



Peter Eichar
County of San Diego Planning & Development Services
5510 Overland Ave, Suite 310
San Diego, CA 92123

RE: Borrego Country Club Estates. Project #DS24

Dear Mr Eichar,

As property owners on Country Club Road, Borrego Springs, my husband and I have strenuous environmental objections to the proposed zoning change of the so called Rudyville parcel from one house per ten acres, to one house per one acre.

The proposed development is in a flood plain which flooded seriously two years ago. We believe our property would be at risk if there is ill advised and needless development in the area. There is no guarantee that any flood mitigation undertaken as part of Project DS24 would be effective or would not result in further flooding danger to our property.

It is no secret that adequate water for the future of the Borrego Springs area is in jeopardy. It is unconscionable to consider a development of this magnitude in these circumstances.

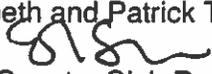
Increased traffic due to construction vehicles and residential use is also a major concern. The threat of noise pollution is real, and must be considered in a place that people retire to for peace and quiet. Country Club Road has been blocked off for some reason so the proposed increase in traffic would go speeding past our door.

There are multiple endangered species in this area, including an ancient Ocotillo forest. There is absolutely no need for anything to be disturbed, as there already are any number of residential lots available in the Borrego Springs area.

We appreciate the opportunity to comment on this proposed project, and ask that our concerns be incorporated into the Notice of Preparation of an Environmental Impact Report on DS24, Borrego Country Club Estates.

Sincerely,

Elizabeth and Patrick Thompson


3445 Country Club Road
P.O.Box 2684
Borrego Springs, CA 92004

415-300-6492
lizziestewart@yahoo.com

DAVE & LUC WITZGENSE
3266 Broken Arrow Rd.
Borego Springs, CA
92004

SAN DIEGO, CA 92101
02 FEB 2015 PM 3:1



Department of Planning & Development
Service

Project # D524

ATTN: Perry Eicher

5510 Overland Ave, Suite 310

San Diego, CA

RECEIVED
FEB 04 2015

Planning and
Development Services

92123
521231233333



Attn: Peter Eichar
Department of Planning and Development Services

Regards: Housing Development project know in Borrego Springs as "Rudyville," and referred to by County as DS24 or Borrego Country Club Estates.

We are **opposing** this development here in Borrego Springs for reasons below:

1. We live full time on (3266 Broken Arrow Rd., Borrego Springs, Ca 92004) due to this project above will cause us more undue traffic and air pollution in our area.
2. Grading or denuding 172 acre and destabilizing the dunes will result in horrific sandstorms, dust that will degrade air quality in the valley and expressly in our area.
3. No need to grade such a beautiful area here in Borrego Springs for unneeded building sites. There are already already thousands of unsold vacant lots here in Borrego Springs along with the lots around Borrego Springs resorts that already have utilities.
4. Water!! Borrego is already concerned about the shortage depleted aquifer another 172 homes will not help with our water depletion.
5. Flood plain, endanger species, ancient ocotillo forest along with other beautiful old growth desert plants.
6. It would be devastating for everyone who lives here in Borrego Springs if this development goes through. Please don't deface our beautiful town we all love so dearly.

Thank you, Dave and Sue Unterseher

Sam S Webb
PO Box 2268
Borrego Springs, CA 92004



1000



92123

U.S. POSTAGE
PAID
BORREGO SPRINGS, CA
92004
JAN 29 '16
AMOUNT
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RECEIVED
FEB 01 2016

Planning and
Development Services

SAN DIEGO COUNTY
DEPARTMENT OF PLANNING & DEVELOPMENT
5510 OVERLAND AVE, SUITE 310
SAN DIEGO, CA 92123

SAM & ASTRID WEBB
PO BOX 2268
BORREGO SPRINGS, CA 92004



January 29, 2016

Department of Planning & Development
5510 Overland Avenue, Suite 310
San Diego, CA 92123

Subject: Rudyville Project – Borrego Springs

Dear Mr. Eichar,

Everyone in Borrego Springs knows about “Rudyville” - It got that name because the residents of our town universally objected to this proposed housing project.

Why the objection? Because this “Rudyville” project is located in the middle of the best, and perhaps largest, Ocotillo forest in the Anza-Borrego Desert. The residents of Borrego Springs recognize and appreciate this fact and want to protect this desert treasure along Borrego Springs Rd (Hwy S-3) that leads into their desert community.

I have attached a couple of photos that I have taken of the Ocotillo forest that the proposed “Rudyville” project would displace. Hopefully, after viewing these photos you too will realize why the County must not approve this project . . .

This unmatched desert Ocotillo forest must be forever protected!

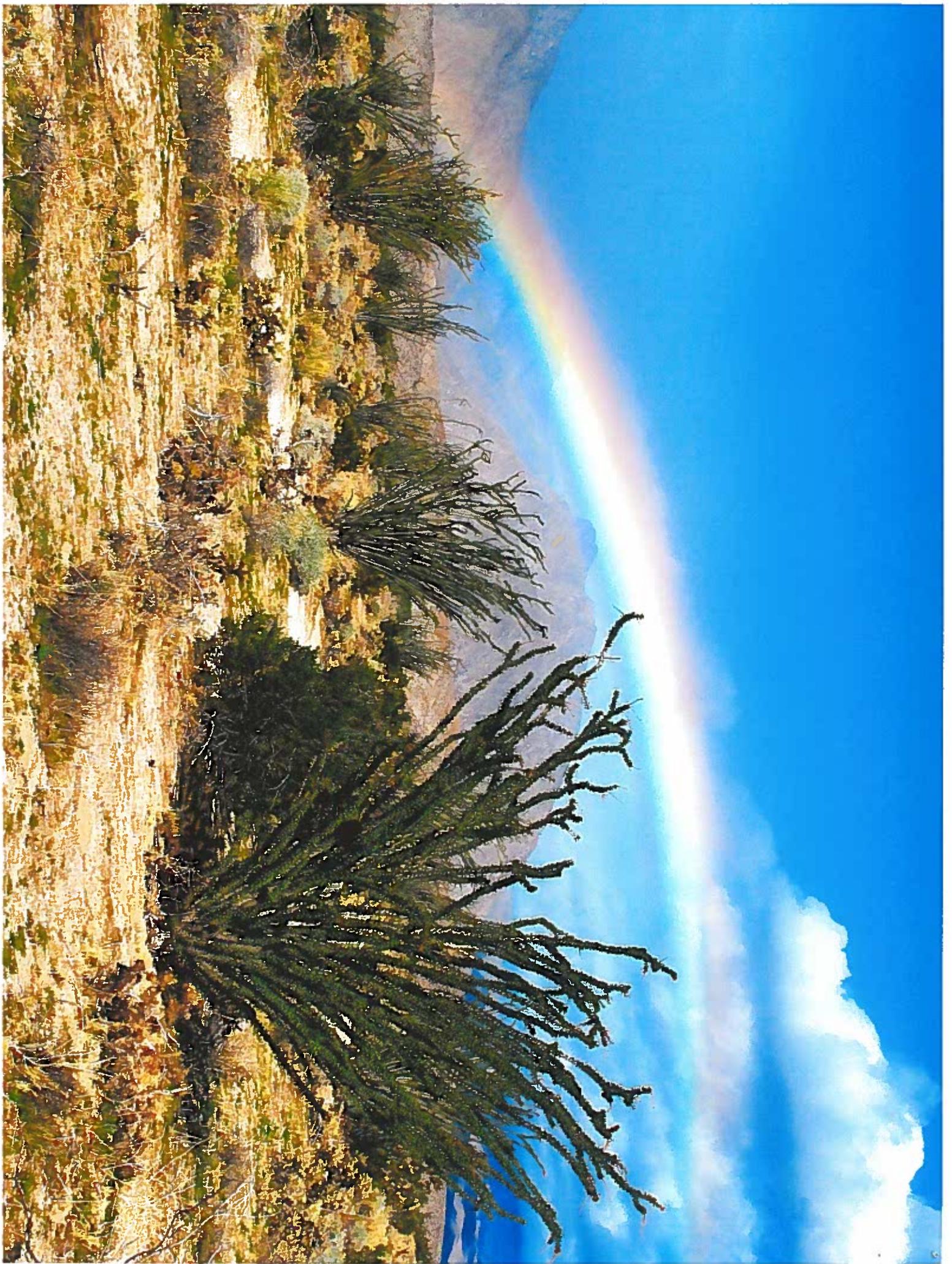
Sincerely,

A handwritten signature in blue ink, appearing to read 'Sam Webb', with a long horizontal flourish extending to the right.

A handwritten signature in blue ink, appearing to read 'Astrid Webb', with a long horizontal flourish extending to the right.

Sam & Astrid Webb

cc: Borrego Sun Newspaper





From: [Ginna](#)
To: [Eichar, Peter](#)
Subject: Project DS24 Borrego Country Club Estates
Date: Wednesday, February 03, 2016 3:30:35 PM

The proposal of project DS24, Borrego Country Club Estates, was recently brought to my attention. When I heard this news I was saddened and concerned for all the people of this close knit community as well as for all our welcomed tourists. Project DS24 will jeopardize our quality of life.

Here's why.

1) This area is home to what Borregans call the "Ocotillo Forest". This beautiful desert Ocotillo manages to survive through 120 degree summers and years of drought to faithfully show off bright green leaves and red/orange blossoms come the next rain. Tourists as well as locals have come to love this area.

2) Wind has become one of our newer challenges. If this large area were scrapped I fear the ensuing blowing sand would cause major health concerns for all living and visiting in the vicinity. I live in nearby Ocotillo Heights and the wind blows towards me from that direction. Locals already call us the "windy" part of town. Blowing sand could be devastating. This area has many young children and senior citizens.

3) In addition to my home in Ocotillo Heights, I also own two 1+acre vacant lots on West Star Rd. These lots are in the neighborhood next to the proposed project DS24. I have been wanting to sell my neighborhood lots but the economy has not yet recovered in Borrego Springs. Discussions with local realtors indicate that vacant lots are not selling. It appears to me that there is not a need for new graded lots in Borrego Springs.

Please do not approve project DS24, Borrego Country Club Estates. I beg you to help keep Borrego the small town community it is and a wonderful place for tourists to visit.

Thank you!

Sincerely,

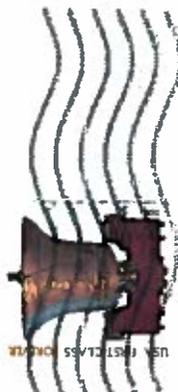
Virginia West

3579 San Rafael Rd.
Borrego Springs, Ca 92004

P.O. Box 1816
Borrego Springs, Ca 92004

760 271-5131

Ronald Wheatley
PO Box 2051
Borrego Springs, CA 92004



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Planning and
Development Services

ATTN: Mr. Peter Eichner (Re. Prod. DS24)
DEPT. OF PLANNING & DEV. SERVICES
5510 OVERLAND AVE. SUITE 310
SAN DIEGO, CA 92123

92123123985



Ronald E. Wheatley
PO Box 2051
3424 El Tejon Rd.
Borrego Springs, CA 92004
January 30, 2016

Attn: Mr. Peter Eichar
Dept. of Planning and Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

This is a COMMENT LETTER in regards to Borrego Country Club Estates

Project #DS24

Greetings All:

I respectfully oppose the proposed amendment to the General Plan regarding re-zoning on this parcel for a number of reasons, the first being the severe over-drafting of our aquifer, which is the only source of water for residents in the Borrego valley.

To increase the residential load of this parcel by a factor of ten would have a serious long-term effect, which would begin before the new homes are occupied: Water is used extensively for dust control during grading, and also to settle the earth before pouring foundations. Tens of thousands of gallons of water, that took hundreds of years to accumulate, will be spent on each home site before concrete is even poured.

The Borrego valley doesn't need new developments, and especially one with that density. The existing subdivisions currently have hundreds of vacant lots available for building, and that number will only exacerbate the overdraft further if these many dozens of new homes are allowed.

Another major concern is flood control. This proposed development is "uphill" from Unit G and surrounding homes to the east. What will be done to provide new and safe floodwater courses after the established ones are disrupted by the new construction? How will the developers ensure that flooding water will not flow through Unit G? (Will private land be taken?) This could have an immediate and very serious impact on the safety of residents and also on home values in what could become a "downstream flood area" during and after construction.

I respectfully request that the Department not change the zoning of the parcel known as Borrego Country Club Estates (Project DS24) from one house per ten acres, to one house per acre.

Sincerely,

 1/30/2016

Ronald E. Wheatley

Wingsid
3338 El Topin Road
Bonero Springs, CA 92004

SAN DIEGO CA 920
28 JAN 2016 PMS 1



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Planning and
Development Services

Mr. Peter Eichen
Dept. of Planning & Development Serv.
5510 Overland Ave #310
San Diego CA 92123
92123123985



January 27, 2016

Mr. Peter Eichar
Department of Planning and Development Services
5510 Overland Ave. Suite 310
San Diego, CA 92123

RE: BORREGO SPRINGS PROPOSED RESIDENTIAL DEVELOPMENT "RUDYVILLE"
(COUNTRY CLUB AT BORREGO SPRINGS ROAD)

Dear Mr. Eichar,

I am cautiously concerned and opposed (until I am more informed) of the proposed big residential development in Borrego Springs at Country Club and Borrego Springs Road.

I am trying to decide if the information being voiced by the residents of Borrego Springs is true and valid, or just an attempt to prevent a "not in my backyard" push back. If your department or some official representative could provide facts and assure us that the proper filters and reviews have been done and requirements have been met, then by all means, an individual landowner should be able to do what they see fit with the land.

But with this said, I am concerned about the impact a development of this size may have on the community. I am a homeowner directly east of the proposed development (within a mile). So this makes me one of those "not in my backyard" people as well.

1. I am concerned of how a development would handle being in the possible flood plain (as I saw it to be about two years ago). And how a new development may or may not redirect floodwaters on to my neighborhood and my home.

2. Water: Can Borrego Springs with it dire lack of water support this big of a development?
3. Environment: Has there been discussions and reviews of scraping this much land? I am concerned of the desert dust storms it would cause. Winds from the west pushing that dust into my home and the quality of air to breathe.
4. Is it true what I read about the beautiful old ocotillos? Are those grand ocotillos truly unique to the desert environment? Are there other giant ocotillo forests in the Anza Borrego Desert?

Recap:

Major Concern: Flood plain and flooding.

Major Concern: Water.

Major Concern: Air Quality.

Subjective Comment: is there a demand for this? There sure are a lot of empty lots for sale. And there sure is a ton of residential inventory in the Borrego Springs market.

How can I be assured that these should not be a concern of mine? Until I know more, I stand OPPOSED to this development.

Thank you,



Robert Wright

3330 El Tejon Road
Borrego Springs, CA

619-248-8109

Richard Yates
PO Box 2110
Borrego Springs, CA 92004



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Development Services

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PETER EICHAAR
DEPARTMENT OF PLANNING &
DEVELOPMENT SERVICES
5510 OVERLAND AVE, SUITE 310
SAN DIEGO, CA 92123

92123123985



Mr Peter Eichar
Department of Planning and
Development Services
5510 Overland Avenue
Suite 310
San Diego, CA 92123

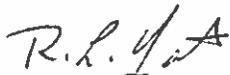
Dear Mr Eichar,

This letter is to register my strong opposition to the proposed "Rudyville" development in Borrego Springs. I oppose the "Rudyville" development for the following reasons:

1. Lack of Water. As shown by a recent USGS report, Borrego Springs is running out of water. I think the County should take action to suspend approval of all large developments in Borrego Springs until the very serious issue of overdraft of our aquifers is addressed.
2. There is already a large surplus of building lots of every price range and in every location of Borrego Springs. Many of these lots have set vacant for years. The proposed development of 172 building lots in "Rudyville" will add unnecessary additional building lots.
3. The proposed development is in a sensitive desert environmental that will be destroyed by clearing and grading. Clearing and grading could cause serious dust problems for Borrego Springs residents.

I hope the Department of Planning and Development Services will deny the proposed "Rudyville" development.

Thank you for your attention.



Richard L Yates
PO Box 2110
Borrego Springs, CA 92004



The Desert Protective Council, Inc.

P.O. Box 3635, San Diego, California 92163-1635

protectdeserts.org

January 30, 2016

To: County of San Diego
PLANNING & DEVELOPMENT SERVICES
5510 OVERLAND AVENUE, SUITE 310, SAN DIEGO, CA 92123

RE: PROPERTY SPECIFIC REQUESTS GENERAL PLAN AMENDMENT AND REZONE
Project Numbers: PDS2012-3800-12-005; PDS2014-REZ-14-006
Via email and USPS mail

This letter should serve as a public comment on the Notice of Preparation filed by the County regarding the County's plan to prepare a Subsequent Environmental Impact Report (SEIR) to analyze the environmental impacts of proposed Property Specific Requests (PSR) that would amend the County's General Plan.

Specifically, this letter addresses PSR Desert 24, (DS24), in the Desert Subregion of the General Plan. This PSR is also known as the proposed subdivision Borrego Country Club Estates and relates to a proposed density change from SR-10 to SR-1 on two large parcels in Borrego Springs.

First and foremost, the Desert Protective Council objects to the inclusion of PSR Desert 24 in the SEIR because a project of this scope and controversial history is worthy of its own EIR. Attempting to change the density on this parcel as part of a much larger SEIR that will also affect parcels throughout the county, ignores the special considerations of the desert and this PSR in particular. The community of Borrego Springs, including numerous residents, the Anza-Borrego Desert State Park, and the Community Sponsor Group has analyzed a density change for this project since 2006. The developer sought entitlements to build one home per acre on this untouched, native desert landscape long before the General Plan Update was passed. The proposal was poor then and it remains poor now. The Borrego Springs Community Sponsor Group has opposed the density change for the past decade and supports one dwelling unit per 10 acres in the project area. A project of this complexity deserves its own EIR, and should not be considered as part of a hodgepodge General Plan Amendment.

The affected parcel (DS24) cannot have a density increased properly analyzed in an SEIR to the General Plan Update, because the General Plan Update did not evaluate the property under the state's Sustainable Groundwater Management Act, passed in 2015. DS24 is located within the Borrego Valley Groundwater Basin and the State Department of Water Resources has designated this basin as a critically overdrawn basin. The law requires that any land use decision affecting a critically overdrawn groundwater basin meet the requirements of the Sustainable Groundwater Management Act. To avoid conflict with this law, DS24 should be removed from the slate or projects under study as Property Specific Requests in this NOP.

The mission of the Desert Protective Council is to safeguard for wise and reverent use by this and succeeding generations those desert areas of unique scenic, scientific, historical, spiritual, and recreational value, and to educate both children and adults to a better understanding of the desert.

The Desert Protective Council requests that the County perform the necessary level of study that the County is obligated to perform for a change of this magnitude in a desert riparian area that includes many species of concern. The Desert Protective Council supports the Borrego Springs Sponsor Group's objections to the increase in density, including the Sponsor Group's assertion that the community is not interested in the continuation of Country Club Road on the edge of a wilderness area, that the developer's characterization of the parcels as Sonoran Creosote Bush Scrub does not recognize the sheer number and quality of the numerous ocotillo plants on the land, and because the underlying sand dune that bisects the property should not be disturbed for numerous reasons.

Specifically, the Desert Protective Council requests that the following areas of concern be addressed fully before any increase in density is considered for DS24.

Aesthetics

The land in question is known as the "Ocotillo Forest." The area appears on historical maps of the valley as a tourist destination where one can see hundreds and hundreds of stately ocotillo plants from the vantage point of Borrego Springs Road. These plants bloom with a red top and green leaves during peak periods and are visible from many lookout points in the Borrego Valley. Grading of this habitat, as proposed by the developer, would destroy aesthetics, including from lookout points in Anza-Borrego Desert State Park.

How will the view shed be protected from electricity poles, high elevations needed to protect any structures from floodwaters, and how will Borrego Springs' International Dark-sky Community designation be protected?

Air Quality

DS24 contains portions of a relict sand dune that has stabilized over time. Any disturbance to this sand dune is likely to cause serious air quality problems for the residents of Borrego Springs. High winds blow in the area and if the vegetation and structure of the relict sand dune were disturbed by grading or by increased density in the area, the blowing dust and fine particulate matter that would be released would cause damage and impact visibility, air quality, and the health of area residents.

Biological Resources

The proposed increase in density for the parcels in question would have major impacts on biological resources. The proposal would destroy one of the most highly concentrated areas of the ocotillo (*Fouquieria splendens*) plant in Borrego Springs.

The site is home to burrowing owl, is in the range of endangered Peninsular Bighorn Sheep, and provides potential habitat for flat-tailed horned lizard, various fringe-toed lizards, raptors of concern, the rare hybrid San Diego horned lizard, and Kangaroo rat. The County should request input from the California Department of Fish and Wildlife and the U.S. Fish and Wildlife Service given the proximity of the property to the Pinyon Mountain Wilderness. Surveys of the property during wildflower season should be commenced in the months following periods of significant rainfall to look for rare and endangered flora species.

The proposed change in density for DS24 would impact the habitat of the federally endangered Peninsular Bighorn Sheep. The project is in close proximity to the Tubb Canyon population of Bighorn Sheep that are referred to by the U.S. Fish and Wildlife Service as the South San Ysidro Mountains Subpopulation of the endangered species. These sheep are sensitive to construction noise and depend on the local habitat for their survival.

How can the County adequately address these biological impacts in an SEIR whose underlying EIR focused on the entire County and did not specifically address the desert habitat?

Cultural and Paleontological Resources

The cultural significance of the ocotillo forest should be studied and taken into consideration. The area has archaeological resources, such as potsherds, and scraping the area could adversely impact the cultural resources of the property. The County should conduct studies of the Native American cultural and paleontological resources of the parcels in question before allowing their zoning to be changed.

Geology and Soils

The site of DS24 contains an important sand dune and disturbance of the dune would compact the dune and seriously threaten the seed bank within the dune. Full geological studies of the area should be commenced before any density change would comply with CEQA.

Global Climate Change

The County should study emerging research on the desert as a carbon sink. The desert caliche is formed over thousands of years and sequesters carbon. Any grading or disturbance of this caliche could release carbon into the atmosphere and impact climate change. Experts from the University of California are studying the desert's role in carbon sequestration and the County should analyze the impacts to increase in greenhouse gases from scraping the project area. Additionally, denuded desert loses its ability to absorb carbon. These impacts along with the increased human population are likely not minimal and need to be analyzed .

Hydrology and Water Quality

Borrego Springs is situated on a groundwater basin that is subject to state control because it is being rapidly depleted. How would increasing density on undeveloped lots impact the already over-drafted Borrego Valley aquifer? Would the state allow for the extra draw that such a proposed subdivision would require? How can the County make any density changes without first consulting with the State about the status of the valley's groundwater basin. Further, the project area would require numerous individual wells and septic tanks, to be inserted on shifting and unstable sand, which could cause pollution and instability in the landscape and affect the water table for the rest of the valley. The proposed increase in density is outside of the range of the Borrego Water District and would not have access to sewers. How can the County allow for more than 150 new septic tanks and wells in the project area?

Why haven't the neighboring landowners been informed of plans to create a flood control district in the area? How can the density be increased on the project site when any structures built would be in an alluvial flood plain? Will the increase in density include provisions for eventual flood? How will the State

Park's resources be protected if rainwaters are diverted away from their eventual entry into the park in order to protect the subject property?

Land Use and Planning

The proposed density increase for DS24 is in conflict with the General Plan and the Desert Community Plan. The project has been proposed for the past decade and was considered when both the General Plan maps were developed and the Desert Community Plan was written and updated. How can the Desert Subregion's community plan be changed by way of an SEIR to allow more density in an area that the community requested remain SR-10? Further the Community Plan for Borrego Springs calls for new high-density residential growth to occur in the northern part of Borrego Springs in order to allow for the fallowing of agricultural land and a reduction in water use in the valley. The proposal for DS24 would denude and degrade virgin, virtually untouched landscape, when numerous empty lots are available for development in Borrego Springs. The economic impact of flooding the market with 150 more empty lots and the negative impact on the Desert Subregion Community Plan that calls for residential growth in northern Borrego Springs must be considered. The Borrego Springs Community Plan would need to be updated and should not be done so as an afterthought in an SEIR, when the EIR for the General Plan Update already carefully considered how and where Borrego Springs should grow.

Population and Housing/ Public Services

How can an SEIR to a plan that addressed population in the entire County of San Diego, be used as the basis of a subsequent environmental impact report for the tiny village of Borrego Springs? An increase in population and housing density is likely to have unfavorable consequences in Borrego Springs where water is running out. How will the proposed project affect the Borrego Springs Unified School District? How could density be increased in this area of town when the Borrego Springs Fire Department is already in need of a second fire station? There is currently ample housing in Borrego Springs to support the population.

Transportation and Traffic

Increasing the density on DS24 would affect traffic on Borrego Springs Road, East Star, West Star, and Country Club Road. Portions of these roads are private property, blocked and not paved. How will the SEIR address transportation issues related to the closed and unfinished portion of Country Club Road. How will and SEIR to the countywide General Plan be able to inform the neighbors of DS24 of the potential increases in traffic and changes to their private roads?

Clearly, the proposal to raise the density on DS24 cannot be adequately studied through a Subsequent Environmental Impact Report tied to the County's General Plan Update. The Desert Protective Council and its numerous members request to be kept apprised of any public meetings or opportunities for comment regarding this project. Please send future notices to DPC at PO Box 3635, San Diego, CA 92163.

Thank you for the opportunity to participate in this process. Please add these comments to the public record for San Diego County General Plan Amendment And Rezone-
Project Numbers: PDS2012-3800-12-005; PDS2014-REZ-14-006. Please keep the Desert Protective Council informed of all subsequent documents and public hearings related to this proposed project.

Sincerely,

/s/ Maris Brancheau

Maris Brancheau, Esq.
CA Bar# 313909
(760) 212-9928
marisbrancheau@gmail.com

A handwritten signature in cursive script that reads "Terry Weiner".

Terry Weiner
Conservation Coordinator
Desert Protective Council
(619) 342-5524
terryweiner@sbcglobal.net



December 17, 2015

Thomas Montgomery, Esq.
Office of County Counsel
1600 Pacific Highway, Room 355
San Diego, CA 92101

Dear Mr. Montgomery

I am writing in response to the Notice of Preparation (NOP) for the Subsequent Environmental Impact Report (SEIR) for the Property Specific Request (PSA) designated as DS24 (Borrego Springs Rd. and Country Club Dr. area). I enumerate below the specific reasons that San Diego County ("the County") cannot authorize the SEIR to proceed at this present time:

(1) The County may no longer make land use decisions within a California Department of Water Resources (DWR) designated critically overdrafted basin in contravention of an adopted Groundwater Management Plan (GSP) that is accepted by the State Water Resources Control Board (SWRCB).

In January 2015 the Sustainable Groundwater Management Act (SGMA) became law in the state of California. This law requires that all land use decisions must conform to the requirements of SGMA. **Because the General Plan of San Diego County and the Community Plan of Borrego Springs do not yet conform to the requirements of SGMA, it is not possible to complete a SIER that would conform to current legislative requirements as specified by SGMA that mandates an adopted GSP for groundwater basins in California.**

(2) DS24 is located within the Borrego Valley Groundwater Basin (BVGB). The BVGB has been designated by DWR as a critically overdrafted basin.

A study completed by the U.S. Geological Survey (USGS) indicates that in Borrego Valley, irrigated agricultural, residential, and commercial users, as well as the Anza-Borrego Desert State Park, use approximately four times more water than is replenished through annual average natural recharge of the BVGB underlying the Valley (Faunt 2015). The Department of Water Resources (DWR) has measured groundwater-level declines of more than 100 feet in some parts of the groundwater basin in response to anthropogenic activities, resulting in an increase in pumping lifts; reduced well efficiency; dry wells, changes in water quality; and loss of natural groundwater discharge, principally through reduced evapotranspiration from groundwater. Additionally, in 2015, the U.S.



Tubb Canyon Desert Conservancy

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www.TubbCanyonDesertConservancy.Org

Department of the Interior, Bureau of Reclamation (BR), published a study entitled “*Southeast California Regional Basin Study*.” The BR study concluded that none of the three pipeline alternatives for the Borrego Valley analyzed were economically viable under current conditions, and that further study of the pipeline alternatives was not warranted.

It is therefore my belief that it would be a waste of taxpayer money to proceed with a SEIR that cannot conform to current legal requirements under SGMA. I am officially requesting a written opinion by County Counsel on this issue requiring an adopted GSP before any SEIR is attempted for DS24.

J. David Garmon, MD

J. David Garmon, MD

President, Tubb Canyon Desert Conservancy



Tubb Canyon Desert Conservancy

8899 University Center Lane #170, San Diego, CA 92122 ✉ 858.535.9121 ✉ contact: tcdc@tubbcanyondesertconservancy.org
www.TubbCanyonDesertConservancy.Org



4 February 2016

County of San Diego
Planning and Development Services
Peter.Eichar@sdcounty.ca.gov
Kevin.Johnston@sdcounty.ca.gov
5510 Overland Avenue #310
San Diego, California 92123

Re: Opposition to Property Specific Request Desert Subregion 24 (DS-24) proposed change from Semi-Rural (SR)-10 to SR-1 under the current San Diego County General Plan encompassing ~172 acres of pristine desert (APNs 198-320-01 and 198-320-26)

Dear San Diego County Advanced Planning Staff,

Tubb Canyon Desert Conservancy (TCDC) was established to preserve desert habitat and biodiversity, to protect native plants and wildlife, and to promote understanding of these special places. Tubb Canyon Desert Conservancy represents numerous desert landowners and visitors to the Anza-Borrego Desert in the vicinity of the proposed DS-24 Property Specific Request located on ~172 acres (APNs 198-320-01 and 198-320-26). It is our strong assertion that any increase in density on the DS-24 site would adversely impact neighboring landowners, Anza-Borrego Desert State Park, Pinyon Ridge Wilderness, rare species, and the associated economy of Borrego Springs.

DS-24 is located at the southern edge of the unincorporated San Diego County community of Borrego Springs. **The high conservation and pastoral recreational value of the two subject parcels was broadly recognized during the protracted San Diego County General Plan process, resulting in the final determination to include DS-24 in the lower density SR-10 zoning designation. This decision was correct and fair and should not be altered.** The current owners of the property had the same opportunity as all landowners in the immediate vicinity to provide input during the lengthy General Plan update process.

The high density of buildable lots surrounding the sand dune and a dense ocotillo forest on the DS-24 site as represented on the County planning maps for DS-24 is not reflected in reality and actual land use. DS-24 is not, as described by the property owner, "in-fill" to existing residential housing. In spite of the name "Country Club Road," there is no country club or high-density development in the area around DS-24. In fact, many local residents in the immediate area have deliberately "self-zoned" at lower density than the current SR-2, SR-1 or Village Residential (VR)-2 permits by purchasing vacant land (lots) on one or more sides of their own homes to prevent future development, which, in turn, preserves natural vegetation and wildlife habitat, maintains their semi-rural lifestyle, and protects their scenic views. Many more residents desire to purchase the vacant lot or lots around their homes; however, they cannot yet afford to acquire those parcels. Allowing DS-24, currently zoned low-density SR-10, to become a more "urban" SR-1 would result in smaller lots than currently exist in the surrounding residential area. See the attached aerial photos that document the actual low density of the neighboring homes adjacent to the DS-24 parcels as well as the floodplain and dune complex on the site.

The approved General Plan appropriately took the discrepancy between the County-specified density and reality into consideration, along with other germane factors, in lowering the zoning density for the open space parcels: APNs 198-320-01 and 198-320-26. It should also be noted that the two, large **DS-24 parcels have never been subdivided and have no certificate of compliance.**



Tubb Canyon Desert Conservancy

8899 University Center Lane #170, San Diego, CA 92122 * 858.535.9121 * TCDC@TubbCanyonDesertConservancy.Org

In this context, **the owners of DS-24 should not be granted a special zoning change that has been denied to other adjacent landowners of large parcels.** All property owners should abide equally with the new, lower density zoning in the region. Area landowners recognize the importance of a low-density, natural habitat buffer zone around their homes (or planned homes) that complements and protects adjacent Anza-Borrego Desert State Park. Area landowners, that is, excluding the owners of DS-24, notably Rudy Monica, David Davis, and Chris Brown. It is unacceptable that these property owners, *who had no active application in County Planning for any project at the time the General Plan was approved*, should be granted a free Subsequent EIR, conducted at taxpayers expense, to further their desire to be granted special privileges that other County landowners in the immediate area will not receive and that would be contrary to public interest.

In fact, local opposition to the numerous incarnations of the proposed high-density subdivision promoted by owner Rudy Monica has been consistent and so strong over the years, that immediate neighbors of the site, the larger community, state park personnel, local news media and even some law enforcement and utility company staff routinely refer to the DS-24 project as “Rudyville.” This is because the ostentatious name of “Borrego Country Club Estates” used in past Project documents and at Borrego Springs County Sponsor Group meetings, was perceived as absurd for what has become, over the years, a scheme to grade 172 acres of pristine desert into a grid of small, vacant lots for sale. **Borrego Springs already has a large surplus of buildable lots for the foreseeable future, especially considering the new limitations on water resources in Borrego Valley.**

The density proposed under the requested change for DS-24 is no longer be acceptable in the current, critically overdrafted state of the Borrego Valley Groundwater Basin (BVGB). Regarding water resource limitations on land use planning mandated by the adopted Groundwater Management Plan (GSP) under the Sustainable Groundwater Management Act (SGMA), please refer to the comment letter from TCDC dated 17 December 2015 at the Notice of Preparation public hearing (copy attached).

In a related matter, TCDC is concerned about **inadequate construction of water service infrastructure and the wastewater disposal system for any increased density development proposed on the DS-24 parcels.** In a letter dated July 24, 2008 sent to the San Diego Department of Land Use and Planning, Kenneth H. Lounsbury, of *Lounsbury Ferguson Altona and Peak LLC Attorneys at Law*, wrote the following:

According to the description provided by the developer, the Project will be served by on-site septic systems and groundwater from the Borrego Water District, which will require: 1) the construction of an off-site well that would be tied in to the District water system; 2) upgrading or increasing the pipe sizes surrounding the property; and, 3) upgrading the existing water tank located to the west of the Project with trenching and land disturbance to connect the project area to the tank.

*Regardless of whether a well is even feasible (there is reason to believe it is not, since a nearby well is going dry with minimal water supplies remaining), the developer’s plans are more problematic than considered in the Project’s reports. The plan is for the developer to dig a viable yield well elsewhere in Borrego Valley, then lease or donate the well to the Borrego Water District. The Borrego Water District would, in turn, import water to the large storage tank to the west of the Project site and pipe it to the development. **This will require additional trenching for the pipes, over land that has recently been donated to Anza-Borrego Desert State Park.***

Because Borrego Springs is in the Colorado River District, it falls under the jurisdiction of the Regional Water Quality Control Board, which has started to require treatment plants for housing developments with ten (10) or more units. [Kurt Schauppner Desert Trail, “Who has Sewer Power? The City” March 2, 2007] The only indication that the developer has considered wastewater disposal systems is by a reference in a letter dated February 18, 2008 from the County of San Diego Department of Environmental Health, Land and Water Quality Division which notes deficiencies in the developer’s replacement of the Tentative Map, dated December 19, 2007. According to this letter, with the increase in the number of lots, the developer failed to provide percolation test data on certain lots; failed to include the layout of the existing well, or the layout for the proposed onsite wastewater disposal system and reserve area. Lastly, the letter notes that

"leach lines may not exceed 24 inches of cover and lines may not be placed in fill or in areas of disturbed soil." The fact is that all of the lots in the Project area would be elevated on sand fill from the graded down dune.

The Department of Environmental Health did not recommend approval of the subdivision proposal or the associated preliminary grading plan.

Not surprisingly, there is also a dearth of information in the record on plans for wastewater disposal and / or sewage treatment plans, either on the tentative maps or the preliminary grading plans. Given the Department of Environmental Health's concerns and the possible restrictions by the Regional Water Quality Control Board, the property owners in the Borrego Community (and the County) should be wondering what the developer plans on doing with the sewage from 150+ residences. Apparently, the developer is proposing to grade lots for sale and is not planning on building a planned development.

Most egregiously, the proposed development of the DS-24 parcels involves an unpublicized, covert preferred alternative plan that would infringe on the property rights of neighbors by acquiring land through eminent domain. The owners of the DS-24 site have long planned to build their high-density subdivision in a hazardous floodplain, necessitating the construction of an extensive dam, channel and debris basin flood control system on Tubb Canyon Bajada to divert natural flows away from their land. They intend to finance these extensive flood control structures by convincing County officials to create a new "assessment district" that would impose fees on neighboring landowners.

~60% of the proposed project site is located in a desert riparian floodplain susceptible to periodic flash flooding. Such floods in the desert are a periodic, natural, and beneficial phenomenon that brings water to an otherwise parched landscape. Floods move soil nutrients for vegetation from higher locations to lowlands. Floods also form the ephemeral streams and ponds that numerous species, such as frogs and waterfowl, require for sustenance and reproduction. There are even certain native plants, such as smoke trees, whose seeds have evolved to only germinate after a flood has rolled and battered their tough outer surface. Flood damage to the seed coat signals that there is water present to nourish the seedling, which in turn triggers germination at the right time. Regardless of the role flash floods play in Nature, desert floodplains are an unsafe and unwise location to build homes.

"Flood Hazard Evaluation for Borrego Country Club Estates" is a report with accompanying blueprints and maps prepared by Walter F. Crampton, Principal Engineer for TerraCosta Consulting Company, to analyze flood issues for the DS-24 site; dated August 27, 2007. The report recommends installation of extensive flood control structures and incorrectly states:

*"The 2,700-foot-long existing dike within the headwaters of the Culp-Tubb Canyon drainage was **constructed by the County** in the 1970s to divert flood flows to the south away from the populated east of Country Club Road, and has effectively done so for the last 40+ years."*

The earthen dike in question was *not* built by San Diego County, nor does the County own or even maintain that dike or the smaller sub-dikes located northwest of the main dike across Tubb Canyon Bajada. No easements vesting those levees in the public domain have ever been granted or recorded. The dike in question, which is being allowed to naturalize over time, is privately owned. The main dike and sub-dikes were actually built decades ago by the Army Corps of Engineers, some would argue illicitly without the permission of the original landowners, at a time when numerous floods were occurring across the desert Southwest.

Be that as it may, none of the owners on whose property the old earthen dike and sub-dikes exist would allow the County or any other agency to construct an extensive concrete flood control system including a dam and new sub-dikes across Tubb Canyon Bajada. Nor would neighboring property owners east of the existing old dike approve the construction of concrete channels and diversion berms down unpaved Tubb Canyon Road and across their land (and near their homes) in order to protect the DS-24 parcels from future floods. Only a forced taking of private property by eminent domain, which each and every owner has promised to oppose, could

enable a major flood control system to be built on the natural desert. Apparently, the developers who own the DS-24 parcels have considered exactly that approach.

Burrowing Owls live on the east side of the main dike berm. Eventually, the floods from Tubb Canyon and adjacent mountains will erode the levee and water will once again flow across the bajada and into Anza-Borrego Desert State Park.

In the "Flood Hazard Evaluation for Borrego Country Club Estates," author Walter F. Crampton recommends the formation of a "Geologic Hazard Abatement District (GHAD)" as the means to finance the design and construction of the flood control system. An abatement district levees a tax burden on all the neighboring properties alleged to "benefit" from the project.

This Draconian flood control plan to enable a high-density subdivision to be built where it does not belong presents grave environmental concerns. Blocking natural flood waters from natural arroyos, desert trees and ocotillos in the State Park would degrade the high biodiversity currently thriving on the bajada. An expanded concrete dam and channelized surface drainage system would also be a major visual blight marring scenic vistas.

This extensive dam and channel system, including full blueprints, was never publicized by the developers; not to the affected neighbors who would lose their properties and not to the Borrego Springs Sponsor Group during the many briefings and discussions about the "Rudyville" project over the years. This sort of subterfuge is chilling. It makes one wonder what else is not known about this project. The intent to charge neighbors through a special assessment district, as well as to take private land by eminent domain, in order to build a large development for their own profit, is unacceptable on multiple levels. This massive flood control plan should be definitively opposed by San Diego County. TCDC and the affected landowners oppose this plan along with any attempt to impose special district assessment fees on surrounding neighbors.

DS-24 is located within walking distance of Anza-Borrego Desert State Park and is a component of the transition zone between the Sonoran Desert (Colorado Subdivision) at its western terminus with foothill chaparral. **As with most transition zones, the DS-24 site supports significant biodiversity and listed species** due to the variety of vegetation regimes and terrain located in close proximity. The slightly wetter transition habitat where DS-24 is located encompasses the westernmost complex of Sonoran desert sand dunes, home to numerous lizard species, including the Flat-tailed Horned Lizard (*Phrynosoma mcallii*), a California Species of Special Concern, which favors stable dunes and desert riparian gravel flats. See the annotated California Department of Fish & Wildlife map attached.

The property in question is also an attractive hunting ground for a resident population of Burrowing Owls (*Athene cunicularia*), another California Species of Special Concern. Burrowing Owl populations remain in decline across much of their range. See photo documentation attached of burrowing owls on DS-25. Additional photos are available upon request.

DS-24 is adjacent (within walking distance) to the federal recovery area for the endangered Peninsular Desert Bighorn Sheep (*Ovis canadensis nelsonii* / *cremnobates*). See the annotated U.S. Fish & Wildlife Service map attached.

The varied terrain on the DS-24 site attracts a variety of resident and migratory bird species to its ephemeral water sources and ancient ocotillo forest, including several species of hummingbirds, hawks, warblers, and orioles. Bats roost nearby within local cliff cracks and small caves, flying out at night to feed on abundant insects present around seasonal water sources. Wildflower bloom abundantly on the site after sufficient rain. **The full spectrum of species living within the subject area has not been fully documented, merits further study, and is deserving of full protection from destruction.**

As noted by County planners, **the current designation of SR-10 for the undisturbed desert on the DS-24 parcels qualifies for habitat preservation measures under the Conservation Subdivision Program**

(<http://www.sandiegocounty.gov/pds/advance/conservationsubdivision.html>). **The requested change to higher density SR-1 zoning designation would not qualify for that program.**

As previously mentioned, a vast majority of neighbors and visitors familiar with “Rudyville” have strongly opposed the project in all its various forms over the years. Local neighbors and landowners greatly value the wildlife, wildflowers, and a large, ancient ocotillo forest located on the subject site. In fact, the ocotillo forest was once a popular destination highlighted on local tourist maps. **Development of DS-24 threatens the quality of life and property values of neighboring residents.**

Grading the stable dune and ocotillo forest into rows and rows of elevated vacant lots would result in unconsolidated sand and fine particulates becoming airborne in the frequent high winds (60 to 80 mph) that blow across Tubb Canyon Bajada from the western mountains. Dust storms created by vacant lots would blow into other neighborhoods and pollute the clean, dark skies that are highly valued in Borrego Valley. Borrego Springs is one of only nine IDA-certified “International Dark Sky Communities” in the United States: <http://darksky.org/idsp/communities/>. The tourism value of the Dark Sky designation would be diminished by the proposed development, as would business to a variety of local overnight accommodation and eating establishments, and other businesses supported by visitors.

Destabilizing the sand dune would also increase health risk in the community. Many persons move to the desert to improve their health, including seniors and those with allergies and other respiratory conditions. DS-24 is located in a high wind corridor that would pick up fine sand and dust particles from the 172+ acre denuded dune and graded floodplain, creating localized dust storms that would lower air quality to an unacceptable level, both in the immediate area and farther away in residential and recreational areas “downwind.” The resulting degraded air quality would also diminish the tourist value of Borrego Springs and the surrounding Anza-Borrego Desert State Park, resulting in harm to the local economy. Tourism revenues have decreased in other communities where a nearby land use change has resulted in a thick haze, high airborne particulate counts, and more frequent asthmatic, allergic, and other negative respiratory reactions in visitors and local residents.

Country Club Road across the DS-24 acreage is not paved and not currently used with any frequency by the public. **Roads planned through any future subdivision, along with the numerous vehicles associated with a higher density of homes, would bring undesirable and intrusive traffic onto existing narrow roads and through quiet neighborhoods, thereby changing the pleasant character of the semi-rural streets and sparsely spaced desert homes.** According to the 2006 “Transportation Analysis for Borrego Country Club Prepared for Borrego Country Club Estates (second submittal: June 13, 2006) by Urban Systems Associates, Inc. of San Diego, CA,” for the DS-24 site, the proposed subdivision would generate approximately 1,480 average daily vehicle trips, with 118 occurring during morning peak hour and 148 in the PM peak hour. Much of this traffic would be directed onto West Star and East Star Roads to the north of the site. These roads are both narrow (~20 feet wide), rural in nature, and insufficient for increased 2-way traffic flow. Redirecting traffic out of the area via those low density roads will require extensive widening and redesign that will adversely impact adjacent, established homes, and increase danger to pedestrians and animals, including wildlife and horses. Increased commercial vehicle traffic serving the proposed subdivision, such as heavy garbage trucks, UPS and Federal express delivery trucks, etc. will greatly accelerate road wear, necessitating more frequent and costly road maintenance and repair.

Increased traffic, private and commercial, would also contribute to higher ambient noise levels generated by a concentration of houses in what is an otherwise very low-density location. **Noise generated by an increased density of homes and associated human activities on the DS-24 parcels would reverberate off the nearby mountains and canyons, causing unacceptably high noise levels locally and across the adjacent State Park.** Noise is potentially destructive to both wildlife and the tranquil setting visitors expect in the State Park. Neighbors who moved to the outskirts of town for added solitude highly value the subtle sounds of nature around their homes, including bird songs, the chorus of frogs and toads after rain, as well as serenades by coyotes out on the bajada. All this would be lost if the DS-24 site is ever developed.

Increased traffic also has the potential adverse impact of vehicle emissions generating an inversion layer, further degrading air quality and visibility in the Borrego Valley. This consequence of increased traffic needs to be fully evaluated. Obscured views across scenic vistas would harm the local tourist economy.

A higher density subdivision would destroy ancient Native American sites. Tubb Canyon Bajada was once heavily used by the local Cahuilla for their seasonal harvest of agave. Nearby canyons and arroyos were a reliable source water in the desert from both nearby springs and ephemeral floods. Potsherds, stone hand tools, and other Native American and pioneer artifacts are often found in the surrounding area and are no doubt present on the DS-24 site.

Lastly, it has come to our attention that an owner / investor in DS-24, Chris Brown, is allegedly a former San Diego County employee who has worked directly for Supervisor Bill Horn in matters of regional planning. This relationship raises conflict of interest questions originating at the 2012 Board of Supervisors hearing that authorized a Property Specific Request (PSR) for the DS-24 site... in spite of strong, ongoing community and Borrego Springs Sponsor Group opposition... and, in spite of the fact that there was *no active application for any subdivision project on the DS-24 parcels* in the County planning system for *several years* before the new General Plan was ratified. The value of a “free” EIR for the landowners of DS-24 is immense, because this costly process may lead to special privileges for Mr. Brown and his partners that will not be granted to other landowners in the same area, and likely involving eminent domain “taking” of nearby properties for the purpose of a future subdivision.

This PSR is particularly unjustified considering the fact the owners’ original project plan for “Borrego Country Club Estates” (TM5487) had been in the County “dead file” *for years* at the time of General Plan approval. All this, along with the substantial impacts raised in this letter, generates suspicion about how a Project Specific Request for DS-24 ever qualified for County consideration.

Based on all of the reasons and evidence presented herein, TCDC urges the County to disqualify and remove DS-24 from the collective Property Specific Request SEIR process (thereby saving taxpayer funds and conserving limited County resources, including valuable staff time). In any case, the County should deny the zoning change that the owners of DS-24 have requested.

Sincerely,



J. David Garmon, MD
President, Tubb Canyon Desert Conservancy



Ocotillo and sand dune on DS-24 site.

Enc

Burrowing Owls on DS-24 Parcels

Active burrowing owl burrow on the DS-24 property proposed for complete grading and leveling. Red arrows (upper left of image) indicate greyish owl pellets above the hole (located just left of one "observation perch" in the creosote bush that extends over the burrow's entrance). There is a back entrance (exit) to the burrow on the other side of the bush.

Photo by L. Paul



Close up of a burrowing owl "pellet" (~2 inches long). Fur, bones, insect chitin and other indigestible parts of prey collect in the bird's gizzard where they are compressed into a pellet form, then regurgitated by the owl. Note the leg bones and piece of rodent skull above the pellet. Several pellets were taken from the DS-24 site as tangible, physical proof of the burrowing owl's existence on the property.

Photo by L. Paul

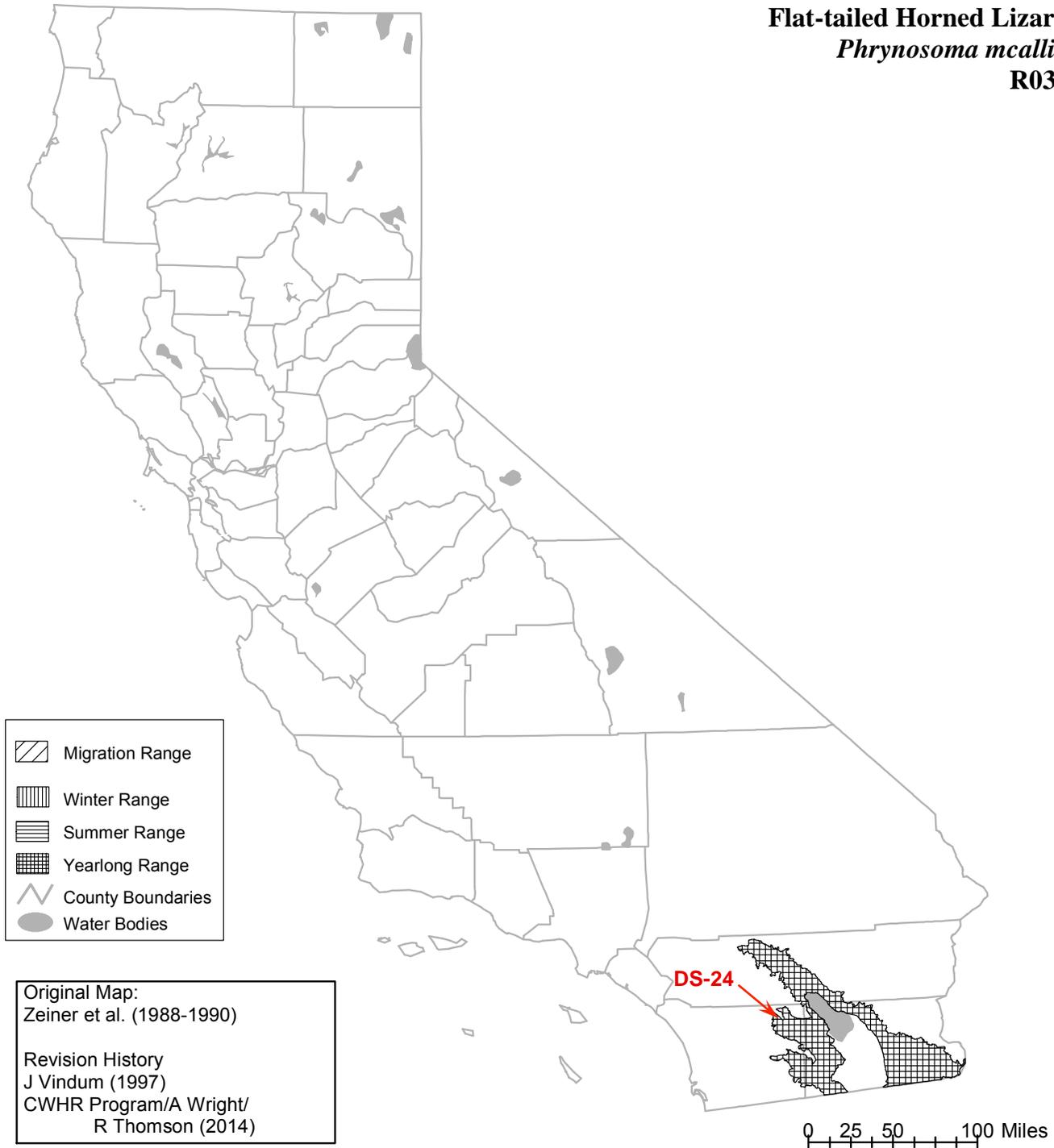


Burrowing Owl (*Athene cunicularia*) near property. Burrowing owls are a California Dept. of Fish & Wildlife Species of Special Concern. Photo by Thad McManus (used with permission)

California Wildlife Habitat Relationships System

California Department of Fish and Wildlife
California Interagency Wildlife Task Group

Flat-tailed Horned Lizard *Phrynosoma mcallii* R032



Range maps are based on available occurrence data and professional knowledge. They represent current, but not historic or potential, range. Unless otherwise noted above, maps were originally published in Zeiner, D.C., W.F. Laudenslayer, Jr., K.E. Mayer, and M. White, eds. 1988-1990. California's Wildlife. Vol. I-III. California Depart. of Fish and Game, Sacramento, California. Updates are noted in maps that have been added or edited since original publication.

DS-24 is located at the boundary of the South San Ysidro Mountains / Region 7 of the Recovery Plan Habitat for the federally listed (endangered) Peninsular Bighorn Sheep. [Map excerpted from page 11 of the "Peninsular Bighorn Sheep (*Ovis Canadensis nelsonii*) 5-Year Review" by the U.S. Fish and Wildlife Service, April 21, 2011. Estimated location of DS-24 parcels added.]

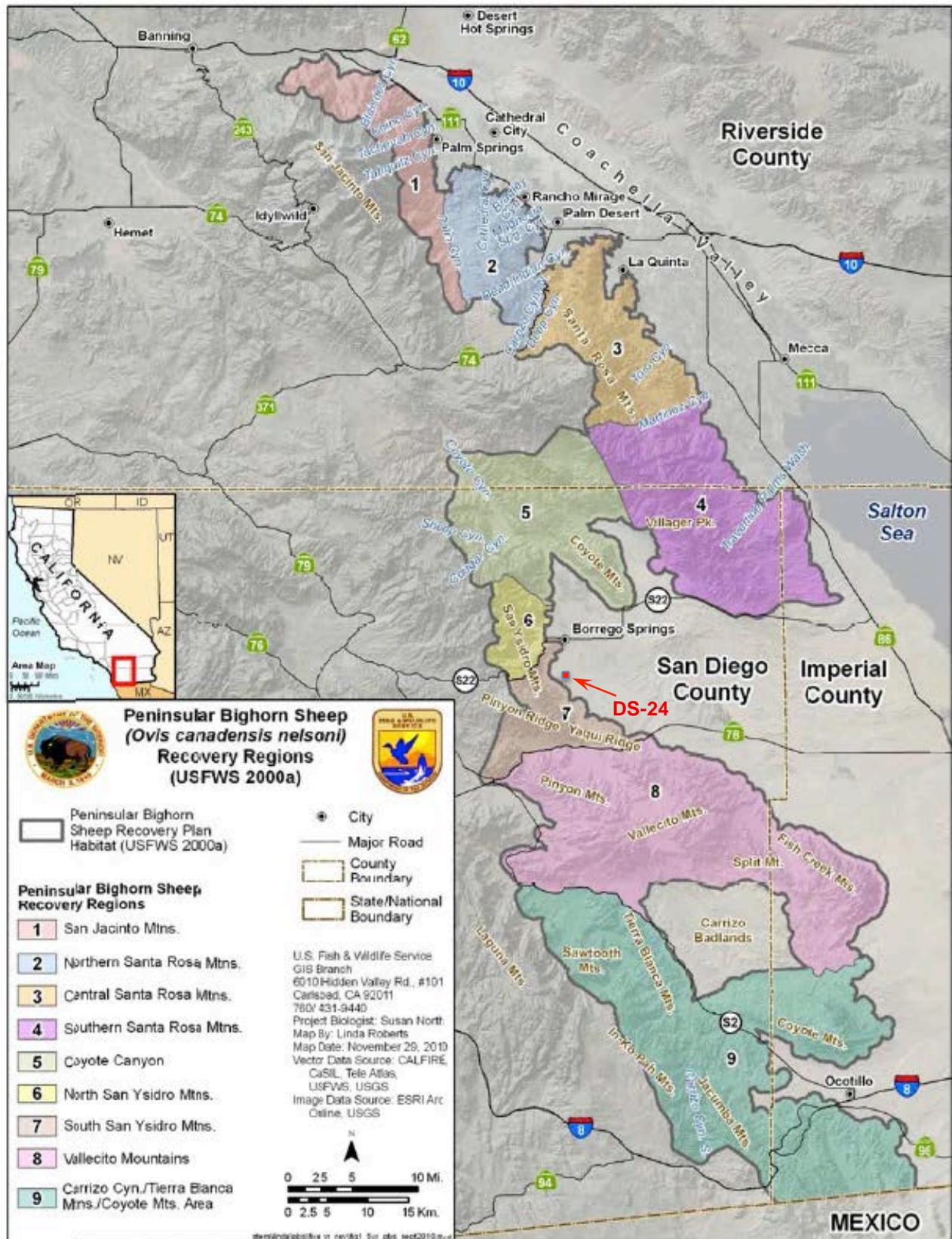


Figure 1: Recovery Regions and Recovery Plan Habitat for Peninsular bighorn sheep (*Ovis canadensis nelsonii*) as delineated in the Recovery Plan (USFWS 2000a).

AERIAL SATELLITE PHOTOS OF DS-24 PROPERTY

(Source: Google Maps, May 2012)



In this image, note that the southern boundary of the BCCE property is a non-County-maintained section of Country Club Road, which is functionally little more than a poorly surfaced dirt road across this section. As the town center is due north on Borrego Springs Road, note that the proposed “Country Club Road Extension” provides nothing to improve traffic flow.

All the land bordering the DS-24 property to the south is essentially undeveloped open desert. Much of it belongs to Anza-Borrego Desert State Park and is part of a relict dune system as well as a desert riparian corridor and watershed adjacent to undeveloped mountains.



Note the low density of existing homes surrounding the property. Many homeowners have purchased multiple lots to preserve desert habitat and the rural



December 17, 2015

To Whom It May Concern:

We are writing in response to the Notice of Preparation (NOP) for the Subsequent Environmental Impact Report (SEIR) for the Property Specific Request (PSA) designated as DS24 (Borrego Springs Rd. and Country Club Dr. area). We enumerate below the specific reasons that San Diego County ("the County") cannot authorize the SEIR to proceed at this present time:

(1) The County may no longer make land use decisions within a California Department of Water Resources (DWR) designated critically overdrafted basin in contravention of an adopted Groundwater Management Plan (GSP) that is accepted by the State Water Resources Control Board (SWRCB).

In January 2015 the Sustainable Groundwater Management Act (SGMA) became law in the state of California. This law requires that all land use decisions must conform to the requirements of SGMA.

Because the General Plan of San Diego County and the Community Plan of Borrego Springs do not yet conform to the requirements of SGMA, it is not possible to complete a SIER that would conform to current legislative requirements as specified by SGMA that mandates an adopted GSP for groundwater basins in California.

(2) DS24 is located within the Borrego Valley Groundwater Basin (BVGB). The BVGB has been designated by DWR as a critically overdrafted basin.

A study completed by the U.S. Geological Survey (USGS) indicates that in Borrego Valley, irrigated agricultural, residential, and commercial users, as well as the Anza-Borrego Desert State Park, use approximately four times more water than is replenished through annual average natural recharge of the BVGB underlying the Valley (Faunt 2015). The Department of Water Resources (DWR) has measured groundwater-level declines of more than 100 feet in some parts of the groundwater basin in response to anthropogenic activities, resulting in an increase in pumping lifts; reduced well efficiency; dry wells, changes in water quality; and loss of natural groundwater discharge, principally through reduced evapotranspiration from groundwater. Additionally, in 2015, the U.S. Department of the Interior, Bureau of Reclamation (BR), published a study entitled "*Southeast California Regional Basin Study*." The BR study concluded that none of the three pipeline alternatives for the Borrego Valley analyzed were economically viable under current conditions, and that further study of the pipeline alternatives was not warranted.



Tubb Canyon Desert Conservancy

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It is therefore our belief that it would be a waste of taxpayer money to proceed with a SEIR that cannot conform to current legal requirements under SGMA. I am officially requesting a written opinion by County Counsel on this issue requiring an adopted GSP before any SEIR is attempted for DS24.

J. David Garmon, MD

-- COPY --

President, Tubb Canyon Desert Conservancy



Tubb Canyon Desert Conservancy

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From: [Eichar, Peter](#)
To: [Schoppe, Emma](#)
Subject: FW: TCDC Comment Letter Corrigendum: Missing caption text on DS-24 Aerial Photos
Date: Tuesday, February 16, 2016 2:26:11 PM
Attachments: [Aerial Photos DS-24 dune ocotillo forest.pdf](#)

Hi – can you (or Angelica) handle this for me? Please save email and replace or append the attached graphic to the original submittal.

Thank you.
PE

Peter Eichar, AICP
County of San Diego

From: David Garmon [mailto:jdgarmon@me.com]
Sent: Tuesday, February 16, 2016 2:12 PM
To: Eichar, Peter
Subject: Fwd: TCDC Comment Letter Corrigendum: Missing caption text on DS-24 Aerial Photos

Dear Mr. Eichar,

A truncation of the caption for an aerial photo included in our comment letter re: DS-24 was just noticed. Apparently this was an error that occurred during conversion of our WORD .docx file to the Adobe .pdf file we submitted. Find attached a corrected version as a .pdf with a revised filename. If possible, please replace the aerial image pages in our letter with this copy.

Apologies for this inconvenience.

David

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