

Comment Letter K

Carl Stiehl, Land Use/Environmental Planner
Planning & Development Services
5510 Overland Avenue, Ste. 310
San Diego, CA 92123

March 18, 2013

Shelly Owens
18137 Carl Drive
Jamul, CA 91935

Re: Proposed Equestrian Ordinance

Dear Mr. Stiehl,

Thank you again for attending our Planning Group. It was a delightful presentation, and I'm happy that I was able to attend.

As much as I enjoyed your presentation, I must confess that I was alarmed by what I heard. I can appreciate that the County would want to update an aging ordinance, but I would not have thought that an ordinance would be so skewed toward the benefit of a few, however well funded, and quite possibly place another segment of the general population in harm's way.

As part of that segment to which such an ordinance might prove detrimental, I wish my concerns regarding this proposed ordinance be made part of the public record. To that end, please find enclosed a letter that I sent to Supervisor Jacob detailing just a few of my major concerns. I am confident that there are many others who have already summarized my remaining concerns, and have perhaps done so more eloquently.

Thank you. I look forward to speaking with you soon.

Sincerely,

Shelly Owens

K-1

Response to Comment Letter K

Jamul Dulzura Planning Group Member

Shelly Owens

March 20, 2013

K-1

This comment does not raise an environmental issue for which a response is required. This comment and attached letter will be a part of public record as requested.

Reponses to Comments

<p>Dianne Jacob, Board of Supervisors, County of San Diego County Administration Center 1600 Pacific Highway San Diego, CA 92101</p> <p>March 18, 2013</p> <p>Shelly Owens 18137 Carl Drive Jamul, CA 91935</p> <p>Re: Proposed Equestrian Tier Ordinance</p> <p>Dear Supervisor Jacob,</p> <p>I am writing you to comment on the proposed Equestrian Tier Ordinance currently under review by the County. While I applaud the Board of Supervisors' efforts to update and streamline an aging County Ordinance I am concerned that certain elements of this new ordinance may do more harm than good.</p> <p>I can appreciate that the County would want to protect and promote the interests of a select few of the County's population given that they represent a significant value in terms of economy and recreation. I am well aware that the County's equestrian population does tend to be well funded. However, as a resident of your District, Supervisor Jacob, I would like to think that I have some value as well, and in reading the proposed Equestrian Ordinance, it seems that the equestrian interests being protected may come at the cost of some of the County's more humble residents.</p> <p>Given that the EIR study done for this project listed several concerns related to the "significant and unmitigated effects" that would impact sensitive areas in the County, I won't belabor them further. However, I must reiterate that there are a number of areas in the County where the residents are completely dependent upon well water. Here in Lawson Valley, for example, we are struggling with an ongoing drought and a dire depletion of our ground water resources. Due to location and difficult terrain, it is simply not feasible to have a pipeline brought in to supply us with water. Horses, as you must know, use a lot of water. For the County to allow a commercial equestrian enterprise to move in to our valley and give them free rein for up to FIFTY horses is quite simply appalling. The potential devastation to both the quality of our ground water and its dwindling abundance would be devastating. Yet, that is the scenario being proposed under the most lenient tier, Tier 1 of the proposed Ordinance. No real permit protecting anyone other than the applicant is required, nor is any enforcement necessary. Thus, the equestrians are protected by the County and the residents are left vulnerable to a commercial enterprise that may cause them and their properties irrevocable harm.</p> <p>Supervisor Jacob, I beg you to reconsider the proposed Ordinance and do your best to make it balanced so that it protects not just the equestrian population, but all of the residents of San Diego County. With respect, I would ask you to consider the following:</p> <ul style="list-style-type: none"> • Limit the number of horses to 5 per acre, with a maximum of 25 horses on five usable acres allowed with a Zoning Verification Permit • Require an Administrative Permit on more than 25 horses, with a maximum of 50 horses • Require a Major Use Permit on more than 50 horses or more than 10 useable acres • Require proof that adequate water is available to the property in question and that neighboring properties would not be adversely affected • In areas where wells are in use, require well monitoring of the property for both depletion and contamination • In areas where wells are in use and water depletion is a risk, prohibit the use of irrigated pasture. <p>Thank you, <i>Shelly Owens</i> cc Carl Sticht</p>	<p>K-2 This comment is introductory in nature and does not raise an environmental issue for which a response is required.</p> <p>K-3 It should be noted that some of the areas in question in Lawson Valley and in the Jamul Dulzura Planning Area currently allow horse stables without the need for a permit. Some of these areas are therefore outside the project area. For areas included in the project area, groundwater use was analyzed in the DEIR in Section 3.1.2.3.2 Groundwater Supplies and Recharge. Additionally, a groundwater study was prepared as part of the General Plan Update in 2010. Equine operations are not anticipated to use substantial amounts of water. Most commercial horse stables use imported feed and do not irrigate pasture. It was determined in the DEIR that the water usage would not substantially deplete groundwater supplies or interfere with groundwater recharge. From a general groundwater use standpoint, maintaining existing Equine Operations would be preferable when compared to new intensive agriculture or new residences, which would use more water.</p> <p>K-4 This comment does not raise an environmental issue for which a response is required.</p> <p>K-5 See Response K-3. The proposed horse numbers of 25 horses on five acres in this comment do not meet with project objectives to provide flexibility in permitting</p>
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Reponses to Comments

for equine operators to come into compliance with the code. Staff initially proposed a threshold of 8 horses per acre on up to five acres and the draft ordinance was revised at 10 horses per acre with stakeholder input to meet project objectives. No additional groundwater constraints are included in this project to limit groundwater use. No animal use either agricultural or commercial under zoning has specific limitations to groundwater use, nor does any general agricultural use such as horticulture or crops. The proposed limits for groundwater usage are outside the project objectives and not a part of the regulations being addressed in the ordinance. Groundwater use was analyzed in the DEIR in Section 3.1.2.3.2 Groundwater Supplies and Recharge. A groundwater study was prepared as part of the General Plan Update in 2010. Equine operations are not anticipated to use substantial amounts of water. Most commercial horse stables use imported feed and do not irrigate pasture. It was determined in the DEIR that the water usage would not substantially deplete groundwater supplies or interfere with groundwater recharge. From a general groundwater use standpoint, maintaining existing Equine Operations would be preferable when compared to new intensive agriculture or new residences, which would use more water.

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