

Rough Acres Ranch
Notice of Preparation / Initial Study
Comment Letter #2
Charlene Ayers

Erin Crouthers

From: Bennett, Jim [Jim.Bennett@sdcounty.ca.gov]
Sent: Tuesday, May 20, 2014 2:22 PM
To: Erin Crouthers
Cc: Campbell, Dennis
Subject: Rough Acres Ranch - Comment Letter#2
Attachments: Rough Acres Ranch - 2012-3300-12-021 - Scoping Comments - April 30, 2014.pdf

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

County of San Diego

Planning & Development Services
 5510 Overland Avenue, Suite 110, San Diego, CA 92123
 Phone: 858-694-3820 Fax: 858-694-3373

From: Charlene Ayers [<mailto:char.ayers@att.net>]
Sent: Wednesday, April 30, 2014 2:09 PM
To: Bennett, Jim
Cc: Wardlaw, Mark; Neubauer, Peter; Donna Tisdale; Ranters Roost
Subject: Rough Acres Ranch - Scoping Comments - 2012-3300-12-021 - April 30, 2014

April 30, 2014

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

Groundwater Geologist

County of San Diego

Planning and Development Services

Via Email: Jim.Bennett@sdcounty.ca.gov

Scoping Comments: Rough Acres Ranch: PDS2012-3300-12-021; Log. No. PDS2012-3910-1221005

Mr. Bennett:

Rough Acres Water Company seems to have acquired the existing Rough Acres Ranch domestic water system by fiat and without notice to the Department of Health.

You will note in the attached documents from the Secretary of State that Rough Acres Water Co. filed their incorporation papers on June 4, 2012, and then proceeded to acquire the water system assets sited on APN 611-070-03, Rough Acres Foundation, through filings with the Assessor-Recorder-County Clerk's (ARCC) office.

In reviewing the DEH file, I found no notice to DEH that any of this had happened. It does seem to change the character and mission of the Domestic Water Supply Permit No. 3705068 for Rough Acres Ranch (01/28/2010)) which is to be evaluated in the EIR.

From the Domestic Water Permit:

3. Legal Owner: Hamann Companies.

Hamann et al. has 132 companies none of which are titled "Hamann Companies."

In fact the true owner as listed in ARCC documents since 2008 is "Rough Acres Foundation" which is sited in Colorado Springs. It is not on the list of Hamann companies, and only recently was registered with California's Secretary of State as a "foreign" corporation operating in this state (8/6/2012)

4. The public water system is designed to provide potable water to one lodge with kitchen and ten bedrooms, forty-four apartments, two bunk houses and two barns. The system has one primary ground water source: well 2 (PS Code 3705068-002). Storage consists of (1) 75,000-gallon concrete above ground storage tank and two (2) 250-gallon pressure tanks located next the wellheads.

In examining all the APNs cited in the Rough Acres Water Company's "Articles of Incorporation," I found what looks like at least 3 other wells, besides the one cited in this permit, to be included in the RAWCo.

That has to have an impact on the water supply and groundwater depletion analysis for this project.

7. Issuance of permit does not constitute approval of any use on this site not in conformance with conditions set forth in the major use permit for this facility (2010).

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

Rough Acres Ranch: 2012-3300-12-021

April 30, 2014

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"Significant changes in conditions set forth..." have taken place via the Rough Acres Water Company's acquisition of water rights, and appropriation of the water related assets of the Rough Acres Foundation without notice to DEH.

From the Domestic Water Permit -Therefore:

3. Any new additions to the water system must be re-evaluated for source capacity before permit is amended.

This has occurred via the Rough Acre Water Co., and there has been no re-evaluation.

10. Permit is non-transferable unless change of ownership is petitioned to County of San Diego, Department of Environmental Health.

There appears to have been a transfer of ownership, albeit on paper, and no petition has been filed.

11. Any change in the source of water for the water system, and any modification of treatment, or addition to the distribution system shall-not be acceptable unless DEH approves.

DEH has not approved the “expansion” of the Rough Acres Ranch domestic water system as a result of the Rough Acres Water Co. takeover.

There have been significant changes to the Domestic Water System permitted for Rough Acres Ranch in 2010 which have never been reported to DEH, and which effect the analysis of impacts related to water supply and depletion in this EIR for the Rough Acres Ranch project.

Problems with APN: 611-070-03-00

1. Assessor lists this parcel as “Commercial Hotel/Motel.”

August 2011 General Plan Map of landuse designations for Boulevard shows this parcel as “RL80,” not commercial zoning. There is not supposed to be any commercial outside of the town center:

<http://www.sdcounty.ca.gov/pds/docs/GP/5-Boulevard.pdf>

2. Tax Collector lists this parcel as in default of its property taxes: \$7501.82.

Submitted by:

Charlene Ayers

10801 Dewitt Court

El Cajon CA 92020

Attachments (14)

April 30, 2014

Jim Bennett, P.G. #7707, CHG#854
Groundwater Geologist
County of San Diego
Planning and Development Services
Via Email: Jim.Bennett@sdcounty.ca.gov

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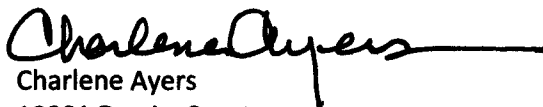
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