

Comment Letter R

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March 16, 2013

Carl Steihl
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SUBJECT: VCCPG Vote on Equine Ordinance Proposal Draft EIR

The Valley Center Community Planning Group has reviewed the draft EIR for the county's proposed Equine Ordinance revision that was released in January, 2013. The following recommendation was approved by the planning group 10-3-0 at our regular meeting on March 11, 2013:

- 1) The Tier 1 concept is good and 3 boarded horses is a reasonable number. However, there should be some above board opportunity for limited activities such as riding lessons as long as the number of horses is limited and no signage or internet advertising was used. This would better address the vast majority of technically noncompliant properties we currently have in Valley Center as long as it was very limited and very specific.
- 2) Densities of 10 horses per acre are too much, 4 horses per acre are unreasonably low. A proposed density of 7 horses/useable acre is a more reasonable density.

I will note that during the discussions there were serious concerns raised regarding the impact on adjacent properties due to the creation of an equine facility built to the limit of a specified tier level next to them. However, it was also pointed out that equine zoned locations are public knowledge. It is the property owner's choice where to live. Along with that choice comes the consequence of accepting a neighboring equine facility even though there may not have been one there initially.

Not voted on were recommendations made in subcommittee to specifically identify all of the equine facility types (i.e. training, transport, rehab, rescue, etc.) in the new ordinance so it will be easily understood which ordinance areas pertain to a particular type of facility

If you have questions, I can be reached at (760) 918-7331.

Respectfully,

Oliver Smith, Chair
Valley Center Community Planning Group

- R-1
- R-2
- R-3
- R-4
- R-5

Response to Comment Letter R

Valley Center Planning Group
Oliver Smith
March 16, 2013

R-1 This comment is introductory in nature and does not raise any specific environmental issues for which a response is required.

R-2 The proposed ordinance largely affects the areas where a Major Use Permit is currently required for a horse stable. The animal designators in zoning in the County tend to be more restrictive in the suburban and rural residential areas in the western parts of the County and less restrictive in the eastern back country areas of the County. The back country areas where a permit is not currently required for a horse stable are not proposed to change. Requiring a Major Use Permit for these areas does not meet with project objectives of the project, specifically to streamline the permitting process for equine operations. The permitting process for the back country is already streamlined, by not requiring a use permit, adding the use permit for stables in the back country would hamper the current permitting process.

R-3 A density of 7 horses per usable acre is close to the initially considered 8 horses per acre during the early phase of the project when ordinance options were

Reponses to Comments

	<p>being developed 2 years ago. However, the proposed ordinance, meeting project objectives, allows for up to 10 horses per acre when meeting all of the requirements and limitations of the ordinance for flexibility. The 10 horses per acre was agreed upon by stakeholders and staff given the direction on the project from the Board of Supervisors. It may be difficult for properties to approach the 10 horses per acre, given the requirements of the ordinance and the limitations of already developed parcels. Many operations permitted under the ordinance may be less than 7 horses per acre.</p> <p>R-4 It is important to note, in addition, that existing properties with areas that are already developed will have limited numbers of horses due to the usable acreage calculation required under the ordinance. If a neighboring property is vacant, there is potential for higher numbers of horses, but the ordinance is more restrictive, requiring greater setbacks to keep the use further from already occupied areas.</p> <p>R-5 All of the service based uses of horses are included in the commercial horse stable use type, including training, transport, rehab, rescue, etc. Each tier, except for tier 1 allowing boarding only, allows all of the potential uses of a horse stable. See response to comment letter D regarding Sally Cobb and Valley Center Subcommittee comments.</p>
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