

PALA - PAUMA COMMUNITY SPONSOR GROUP

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Bradley Smith, Chair

Phone: 760-742-3458

(by email)

January 28, 2018

Kevin Johnson
Land Use/Environmental Planner
Planning and Development Services Dept.
5510 Overland Ave, Suite 310
San Diego, CA 92123

Comments on Draft EIR and General Plan Amendment
Property Specific Requests General Plan Amendment, PDS2012-3800-12-005,
PDS2014-REZ-006; Log No. PDS2012-ER-12-000-003; Sched No. 2015121012

Dear Mr. Johnson,

C1-1

The Pala Pauma Community Sponsor Group reviewed the subject documents at our January meeting. Our comments below relate to the single PSR property in our Group's region. It is designated as **PP30** in the documents.

C1-2

The draft EIR identifies numerous significant environmental impacts of the owner's proposal and points out numerous ways in which it would not be consistent with various General Plan Policies. However, the document identifies a **Reduced Density Alternative** of keeping the current RL-40 designation for the southwestern portion of the project area (south of the San Luis Rey River), and providing an SR-10 designation for the bulk of the area north of the river. This alternative is estimated to result in 31 potential dwellings, 19 more than the potential under the current RL-40 designation.

C1-3

After discussion, the Group voted unanimously to oppose the proposed change to SR-2 because the density would be out of character for the area and would result in too many negative impacts. Of particular concern were the potential groundwater quality impacts of septic

C1-4

systems from the proposed SR-2 density. The western (downgradient) side of PP30 is only about 300 yards upstream from numerous potable wells operated by Yuima Municipal Water District and Rancho Pauma Mutual Water Company.

C1-5

However, the Group voted unanimously to support the Reduced Density Alternative for PP30 that would change the designation for the area north of the river to SR-10.

Sincerely,

Bradley Smith
Chairperson
Pala Pauma Community Sponsor Group

Responses to Letter C1, Pala Pauma Community Sponsor Group

- C1-1 The County acknowledges this introductory comment stating the document was reviewed by the Pala Pauma Community Sponsor Group and that the comments provided in their letter relate to PSR Analysis Area PP30, which is located within the Group's Subregion.

No further response is necessary.

- C1-2 This comment states that the Draft SEIR identifies numerous significant environmental impacts of the owner's proposal as well as inconsistencies with the General Plan policies. This comment describes the Reduced Density Alternative for PSR Analysis Area PP30 and is consistent with the description in Section 4.2 of the Draft SEIR.

No further response is necessary.

- C1-3 This comment states the Pala-Pauma Community Sponsor Group voted unanimously to oppose changing the land use designation of PSR Analysis Area PP30 from RL-40 to a combination of SR-2 and RL-40, because it would be out of character for the area and would result in too many impacts.

The County acknowledges the Pala Pauma Community Sponsor Group's opposition to the Proposed Project map for PSR Analysis Area PP30. This comment does not raise concerns regarding the adequacy of the Draft SEIR; therefore, no further response is necessary.

- C1-4 This comment implies the proposed project could result in potential groundwater quality impacts due to the proximity of septic systems to potable wells operated by Yuima Municipal Water District and Rancho Pauma Mutual Water Company.

The County acknowledges the comment. Section 2.8.3.1 of the Draft SEIR analyzed potential groundwater quality impacts of the Proposed Project at a programmatic-level of analysis. The analysis recognized PSR Analysis Area PP30 would depend on groundwater for water supply and septic systems for wastewater treatment, and determined the Proposed Project could result in potentially significant groundwater quality impacts. The potentially significant impact was conservatively determined to be unavoidable in Section 2.8.5.1, although many 2011 GPU PEIR General Plan policies and mitigation measures would be implemented to reduce impacts on water quality.

If the Proposed Project is approved, subsequent project-level analysis would be required including groundwater quality issues.

- C1-5 The County acknowledges the conclusory remarks that reiterate the Pala-Pauma Community Sponsor Group's support for the Reduced Density Alternative for PSR Analysis Area PP30, which includes changes to the land use designation in the northeastern half of the analysis area from RL-40 to SR-10.