

From: [Nicholas Clapp](#)
To: [Johnston, Kevin](#)
Subject: Rudyville
Date: Saturday, January 13, 2018 1:42:08 PM

Dear Mr. Johnston —

A few days ago my wife Bonnie called you to express her opposition to Rudyville & very much appreciated your well-informed and thoughtful response.

This is to second what she had to say...

- IS-1 [The proposed development — in whatever form —is wrong for our desert community:
- IS-2 [a It will impact, even destroy a remarkable ocotillo forest & its diverse wildlife.
- IS-3 [b Clearing vegetation will create sandstorms impacting housing to the east (including ours).
Air quality will be degraded.
- IS-4 [c *More housing is the last thing Borrego Springs needs.* We're facing a serious water supply crisis & in any case we our valley has an extensive inventory of for-sale home (plus the empty streets & lots of prior, failed developments).
- IS-5 [In a just world, Rudyville's developers could be heroes (opposed to villains) if they ceded the acreage in question to Anza-Borrego Desert State Park. And be remunerated for this at a comparable real-estate rate.

Sincerely,

Nicholas Clapp

Response to Comment Letter I5

Nicolas Clapp
January 13, 2018

I5-1 The County acknowledges the commenter's opposition to Property Specific Request Analysis Area DS24 (the site is referred to as "Rudyville by many in the community).

This comment does not raise concerns regarding the adequacy of the Draft SEIR, therefore, no further response is necessary.

I5-2 This comment states it (DS24) will destroy an ocotillo forest and its diverse wildlife. Potential impacts to biological resources are analyzed in Section 2.4, Biological Resources, of the Draft SEIR.

As discussed in Section 2.4.3.1, Impact Analysis, the estimated acreage of vegetation in DS24 is 168 acres of Sonoran creosote bush scrub. This type of habitat is known to support sensitive plant and wildlife species.

As stated in Section 2.4.3.1 of the Draft SEIR, overall the Proposed Project would have the potential to result in direct and indirect impacts to habitat types that support sensitive plant and wildlife species (Impact BI-1). Implementation of the adopted General Plan policies listed in Section 2.4.5.1 of the Draft SEIR and 2011 PEIR mitigation measures would reduce impact BI-1 but not to a level of less than significant; the impact would remain significant and unavoidable.

I5-3 This comment states clearing vegetation will create sandstorms impacting housing and air quality will be degraded.

A programmatic analysis of potential impacts to air quality is included in Section 2.3, Air Quality, of the Draft SEIR. The programmatic analysis does not speculate on the individual environmental impacts of specific future development projects, including any future development project on land affected by DS24. Any future project would be required to demonstrate compliance with applicable ordinances, including the County's Grading Ordinance, and any applicable requirements for soil stabilization.

I5-4 This comment refers to the inventory of for-sale homes and the serious water supply crisis.

Section 2.8, Hydrology and Water, of the Draft SEIR includes an analysis of the Proposed Project's potential impacts on groundwater supplies and recharge, including the Borrego Valley Groundwater Basin. Section 2.8.3.2 states that future development

of land uses consistent with the Proposed Project densities would increase groundwater demand and exacerbate the present unsustainable use of groundwater resources. Therefore, the Proposed Project would result in a potentially significant impact to groundwater supplies and recharge (Impact HY-2). Implementation of the adopted General Plan policies listed in Section 2.8.5.2 of the Draft SEIR and 2011 PEIR mitigation measures would reduce impact HY-2 but not to a level of less than significant; the impact would remain significant and unavoidable.

- I5-5** This comment expresses the opinions of the commenter. This comment does not raise concerns regarding the adequacy of the Draft SEIR, therefore, no further response is necessary.