

# Rancho Pauma Mutual Water Company

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Tuesday, January 23, 2018

Board of Supervisors  
County of San Diego  
c/o Department of Planning & Development Services  
Advance Planning  
5510 Overland Avenue, Suite 310  
San Diego, CA 92123

Ladies and Gentlemen:

Re: DEIR of proposed GPA Amendment Pala/Pauma 30

L1-1 [ The Rancho Pauma Mutual Water Company ("The RPMWC") which serves an area adjacent to land which is the subject the above referenced proposed General Plan Amendment is grateful for this opportunity to submit its comments regarding the related Draft Environmental Impact Report ("DEIR") prepared by County staff.

L1-2 [ The RPMWC respectfully requests that the Board of Supervisors of the County of San Diego both find the DEIR to be defective and deny any amendment to the existing General Plan related to the land known as PP 30 for the following reasons:

- L1-3 [ 1. While the DEIR identifies at pages 4-61, 4-62 of the document that any development of the subject land will "rely on pumped groundwater" and be on septic, the DEIR makes no assessment of such impacts upon neighboring and downstream properties.
- L1-4 [ 2. Any increase of permitted development will apparently rely upon ground water which is already perilously depleted from earlier years and subject to future management as required by the Sustainable Groundwater Management Act, where the County is a party to an agreement among local agencies under the terms of which a Groundwater Sustainability Plan will be developed. Many property owners and Municipal and Mutual water entities in the surrounding areas have seen their well pumping levels drop dramatically and the ability of their wells to provide water to be significantly reduced.
- L1-5 [ 3. Any expansive use of septic sewage systems will further increase the already high levels of nitrides, nitrates and other contaminants in the limited local groundwater thereby further restricting the use of such groundwater for potable use. Such reduction of potable availability further damages the interests of residential occupancy in the Pauma Valley area.

Rancho Pauma Mutual Water Company,

By:



Charles "Andy" Mathews, President.

Copy: Pala Pauma Community Sponsor Group.

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## Responses to Letter L1, Rancho Pauma Mutual Water Company

- L1-1 This comment provides introductory remarks thanking the County for the opportunity to comment on the PSR Draft SEIR.

Comment noted. This comment does not pertain specifically to the analyses in the Draft SEIR. No further response is required.

- L1-2 This comment requests the Board of Supervisors to find the Draft SEIR to be defective and deny the proposed project's amendment to the General Plan related to PSR Analysis Area PP30. Support for this request is provided in comments L1-3 through L1-5.

Comment noted. Responses to subsequent comments are provided in responses to comments L1-3 through L1-5, below.

- L1-3 This comment states that pages 4-61 and 4-62 of Draft SEIR state that the subject property (PP30) will "rely on pumped groundwater" and utilize septic systems, but that there is no assessment of such impacts upon neighboring or adjacent neighborhoods.

Pages 4-61 and 4-62 are in the Project Alternatives Chapter (Chapter 4 of the Draft SEIR). Sections 2.8.3.1, 2.8.3.2, 2.16.3.1 and 2.16.3.2 of the Draft SEIR discuss the PSR Analysis Areas' current reliance on groundwater supply and septic systems. Potentially significant impacts were determined to result from the Proposed Project (HY-1, HY-2, UT-1, and UT-2). Impacts HY-1 and HY-2 were determined to remain significant and unavoidable after implementation of 2011 GPU General Plan policies and mitigation measures, while impacts UT-1 and UT-2 were determined to be mitigated to level less than significant. The programmatic-level of analysis performed for the Proposed Project does not allow for determination of development project-specific impacts to offsite properties or neighborhoods. That level of analysis (project-level) would be performed for future discretionary project applications in areas covered by the Proposed Project. Future subdivision applications and/or Site Plan applications would be required for development at any of the proposed densities/intensities of the Proposed Project, within all of the areas covered by the project, including PP30. These are discretionary processes which would trigger CEQA review and review of the General Plan policies that are applicable to development applications/proposals. Please also see response to comment C1-4.

- L1-4 This comment states that any increase in permitted development will rely on strained groundwater supplies, which are subject to future management as required by the Sustainable Groundwater Management Act and that well pumping levels in the surrounding area have dropped dramatically.

Refer to response to comment L1-3 above. In addition, Section 2.16.3.4 of the Draft SEIR estimates the increased water supply demand that would occur within each PSR Analysis Area and discloses the impacts on SDCWA member agencies and groundwater-dependent water districts. The Draft SEIR concludes the Proposed Project would have a potentially significant impact (UT-4) related to water supplies for both SDCWA member agencies and groundwater-dependent districts. This impact was determined to remain significant and unavoidable after implementation of 2011 General Plan PEIR General Plan policies and mitigation measures. Finally, Page 2.8-3 of the Draft SEIR includes a description of the Sustainable Groundwater

Management Act of 2014, and Section 2.8.3.2 includes an analysis of the Proposed Project's potential impacts on groundwater supplies and recharge.

- L1-5 This comment implies that expansion of septic systems will impact the quality of groundwater (nitrides and nitrates), thereby further limiting use of groundwater for potable use.

Section 2.16.3.1 of the Draft SEIR provided an analysis of potential groundwater impacts from septic systems. As stated in the Draft SEIR future developments within most of the PSR Analysis Areas and the western portion of the former Champagne Gardens Specific Plan Area are anticipated to primarily use septic systems to treat wastewater, which would be required to comply with the San Diego Regional Water Quality Control Board waiver of waste discharge requirements for septic systems. Furthermore, Section 2.8.3.1 provides an assessment of water quality impacts associated from the proposed land uses within groundwater-dependent areas and concludes that future growth associated with the Proposed Project could potentially lead to contamination of the groundwater. The Draft SEIR referenced several General Plan policies (COS-4.2, COS-4.3, COS-4.4, COS-5.2, COS-5.3, COS-5.5, LU-6.5, LU-6.9, LU-14.1, LU14.2, and LU-14.3) and mitigation measures (Hyd-1.1, Hyd-1.2, Hyd-1.3, Hyd-1.4, Hyd-1.5, Hyd-1.6, Hyd-1.7, Hyd-1.8, Hyd-1.9, and Hyd-1.10) to reduce impacts associated with wastewater treatment requirements. However, the County concluded that even with implementation of the policies and mitigation measures, potential impacts would not be reduced to a level below significant.