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From: Dan Silver [mailto:dsilverla@me.com]
Sent: Thursday, August 28, 2014 1:17 PM
To: Hingtgen, Robert J
Cc: Wardlaw, Mark; Gretler, Darren M; Snyder, Todd; Real, Sami; Fogg, Mindy
Subject: Shadow Run Ranch

August 28, 2014

Robert Hingtgen
Dept of Planning and Development Services
5510 Overland Ave., Ste 110
San Diego, CA 92123

RE: SHADOW RUN RANCH; PDS2001-3100-5223, PDS2000-3300-00-030, PDS2000-3710-00-0205, LOG NO. PDS2000-3910-0002035; SCH NO. 2002061066

Dear Mr Hingtgen:

The Endangered Habitats League (EHL) appreciates the opportunity to comment on the DEIR for this proposed project on 244 acres. Shadow Run Ranch would insert dozens of residential estate lots into the Pauma Valley, a still largely intact farmland and habitat area. Due to its distance from infrastructure and services, to reduce GHG emissions from long distance commuters, and to protect natural resources, the property was properly designated as Rural 1:40 in the General Plan Update. However, according to the DEIR, the project is allowed to proceed at 10 times that density under the outmoded old General Plan due to "pipelining." The result is sprawl.

According to the biased LARA model that the County uses despite criticism, the site is, predictably, deemed "unimportant" farmland.

Given the unfortunate circumstance of pipelining, it is nonetheless commendable that the project was redesigned as a PRD on 2-acre minimum lots that at least preserves the most sensitive areas as biological open space. Thus, riparian connectivity and associated coastal sage scrub uplands are conserved, maintaining compatibility with a future North County MSCP. There is also a lot for limited continued agriculture.

In conclusion, EHL *concurs* with and appreciates the use of the proposed open space design to mitigate the impacts as feasible given the pipelined 1:4 density.

Yours truly,
Dan Silver

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1. The County acknowledges the comment. The project did gain "pipeline" status many years ago and is being processed pursuant to the previous General Plan Regional Category of Estate Development Area, and Land Use Designation of Intensive Agriculture. These designations allow for a potential of 62 residential lots on the project site; however, the project is proposing a Planned Residential Development of 44 residential lots clustered on 2-acre minimum lots. This design reduces the residential area footprint and preserves agricultural and biological resources in open space such that 56% of the site will be comprised of these open space areas. The project's residential area also allows for and encourages continued agricultural use. The project has been located adjacent to an existing neighborhood of single family homes, many with an agricultural component. It has been designed to reflect the character of the surrounding area and there are existing facilities that serve the community. These include small-scale grocery stores, shops, a gas station, restaurants, and churches within five miles of the site. Modest employment centers exist in two casinos, within three miles. And there is an established agricultural industry that can serve the needs of the continuing agricultural operations on the site. The project is consistent with land use designations and zoning under the previous General Plan, and proposes a Planned Residential Development to cluster development to two acre lots in order to create open space and continue agricultural production activities. The project does not have significant land use impacts for these reasons. The project continues to rely on automobile transportation to reach nearby facilities, but will also install an improved bus stop on the northeast corner of Adams Drive and SR-76 to encourage the use of mass transit. The EIR examined the issue of greenhouse gas emissions in Chapter 3.1.2 and in a Global Climate Change report (Appendix N of the EIR) that have been revised since the public review period, but not as a result of this comment. Project design features will now reduce emissions below the CAPCOA screening threshold, and therefore there will be no impacts. Please refer to the attached table entitled "Summary of EIR Text and Technical Report Changes" for a description of these changes.
2. The Comment is acknowledged. Impacts to agricultural resources were determined to be less than significant. This determination can be found in Chapter 3.1.1, page 3-1 of the DEIR. The project design includes a 39-acre agricultural open space lot and agricultural operations may continue on the residential lots. No change to the DEIR is required as a result of the comment.
3. The County appreciates the comment. No change to the DEIR is required as a result of the comment.
4. The County appreciates the comment. No change to the DEIR is required as a result of the comment.