

Crest-Dehesa-Granite Hills-Harbison Canyon

**Subregional Planning Group
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Dale Morris, Regional Director
Pacific Regional Office
Bureau of Indian Affairs
2800 Cottage Way, Room W-2820
Sacramento, Ca 95825

Environmental Assessment Comments, Proposed Sycuan Reservation "Fee to Trust Development Project"

Dear Mr. Morris,

The Crest-Dehesa-Granite Hills-Harbison Canyon Subregional Community Planning Group, an advisory body of fifteen members, elected by the voters of the Subregion to advise the San Diego County Department of Planning and Land Use and the Board of Supervisors on land use issues, has extensively reviewed the Environmental Assessment presented by the Sycuan Tribe for the "Proposed Fee to Trust Development Project".

There are a considerable number of flaws in the EA that should be addressed more fully in an Environmental Impact Statement. A full EIS would show mitigation measures, if any, that could be applied to those issues that are highly impactive.

In the interest of space and time, a few of these flaws will be pointed out specifically, plus some general points will be addressed. It should be noted that there are many more flaws throughout the E. A. other than those pointed out in this letter.

Section: 3.3 Water Resources Report indicates the quality of the groundwater within the Middle Sweetwater Basin is listed as fair to poor, and the water in the holding ponds at the Sand Mine is reported as stable based upon a report from the Mine Operator in 1993. No additional monitoring data is available since that date. **This should be addressed in an EIS.**

Section : 3.5 Biological Resources Survey Reports are dated from August 2006 to June 2007 listing animal and plant species in the area, these reports appear current, but it was noted that the final report would be forwarded to the USACE for verification prior to filling wet land area. **Should be adequately addressed in an EIS.**

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Section: 3.7 Socio Economic Conditions: The population tables only deals with unincorporated County, and the El Cajon area specifically, and makes no mention of the Subregional Planning Area and the impact that tribal housing being proposed will have on the Subregion and the Dehesa community specifically. The portion under schools has several incorrect statements. There is one elementary school in Dehesa, not two as stated. The Dehesa Charter School is not located in the community. **This should be addressed in an EIS.**

Section 3.8 Transportation and Circulation, fails to address the intersection at Sloane Canyon Road and Dehesa Road, the intersection at Dehesa Road and Harbison Canyon Road, and the intersection at Dehesa Road and Willow Glen Road, all of which have impacts due to the high volume of traffic which the roads are not designed for. **Should be addressed in an EIS.**

Section 4.7 Socioeconomic Conditions/Environmental Justice. This entire section is flawed, with a leaning toward the possible benefits to the Tribe, with no mention of the impacts to the subregion and, therefore, no suggested mitigation measures. **Should be addressed in an EIS.**

Section 4.8 The issues in this Section are very similar to those in Section 4.7. **Should be addressed in an EIS.**

Regarding Phase I Environmental Site Assessment Sycuan Square, Harbison Canyon Road and Dehesa Road, APN 513-110-1400. Section 7. beginning on page six and continuing on page 7 refers to aerial photographs in Appendix D. On page 6 it is stated "... the subject property is undeveloped". However, there are two people (the author of this letter being one of them) who will testify to the fact that there was a Texaco gasoline station near the corner of Dehesa and Harbison Canyon Road. Inspection of the 1953 photograph with a magnifying glass, will show a white object in that location. It cannot be easily identified as a building because of the lack of clarity of the picture. However, the fact remains that there was a gas station at that time. No records in the County of San Diego shows that there was removal of any underground storage tanks.

A visual inspection of the site is not adequate to determine that there was no leakage or that the tanks were ever removed. **This should be addressed in an EIS.**

In reference to the sand mine location and the area of the former Singing Hills Golf and Country Club, now Sycuan Resort, it should be noted that the County deems this to be an impact sensitive area. And indeed it is.

With a proposal of housing along the banks of the Sweetwater River, an equestrian facility, and an RV park on the shores of (pond) Lake Emma, **this alone should be reason enough for a complete EIS.**

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Following are references submitted by Dr. William L. Bretz, Ph.D, Planning Group Secretary, in reference to the sensitive nature of the entire Sweetwater River area, beginning with Sycuan Resort all the way through Sloane Canyon, up to and including Loveland dam and the reservoir.

A full EIS needs to be prepared because the EA does not identify all of the environmental impacts of the Proposed Action; because some of the environmental impacts the EA does identify are not adequately discussed; and because, therefore, the mitigation measures proposed in the EA will not fully mitigate the full range of impacts of the Proposed Action. The best interests of the Sycuan Tribe as well as the public will only be served if an EIS is prepared that includes the following:

- **Lake Loveland Dam Failure Inundation.** Federal and State laws require the preparation of an inundation map for the area that would be flooded by catastrophic failure of a dam and release of the reservoir's impounded water. The entire Sweetwater River channel, as well as tributary channels, in the Sycuan property are subject to this potential hazard, and many elements of the Proposed Action are directly impacted by this. The EA does not acknowledge this impact or propose any mitigation for it.
- **Sweetwater River Flooding.** The EA does not adequately describe the potential risks of natural flooding events in the Proposed Action area, as it only provides a 100-year Flood Map and meager data collected in 2006 at a gage station at the Sloane Canyon Road bridge. In wet years there have been repeated notable floods (i.e. 1978, 1980, 1987, 1995, 1998) that have impacted the area; Sloane Canyon Road (which provides access to much of the Proposed Action area) has lost crossings at Harbison Canyon Creek, the Sweetwater River and Beaver Hollow Creek several times to floods. An EIS that evaluates the history of major flood events along the Sweetwater River and its tributaries would allow the development of adequate, meaningful mitigation for likely future flooding impacts.
- **Catastrophic River Bottom Erosion.** The Sloane Canyon Road bridge and the adjacent valley floor on the south side of the river are vulnerable to destruction either by a dam failure inundation event, or a sufficiently large natural flooding event. Either type of event could overflow and downcut the sand of the valley floor (and Sloane Canyon Road road on top of it) beyond the south end of the bridge; this would initiate a major head-cutting erosion action that would proceed upstream, stripping alluvium from the Sweetwater River bottomland, as well as the North Fork Sweetwater River bottomland extending into the Reservation.
- **Lake Emma Protection Issues.** The EA does not contain adequate data about historic and present water quality conditions of Lake Emma to enable a meaningful consideration of impacts and mitigations associated with the Proposed Action. Sweetwater Authority had to implement a peripheral stormwater runoff interceptor in order to protect the water quality of Sweetwater Reservoir from development impacts, and it seems likely that Lake Emma would require the same sort of mitigation to protect its waters from stormwater runoff impacts of the RV Park, Outdoor Events Center, Equestrian Center, and the Dehesa Road residential subdivision. Also, Sycuan is obligated to maintain a minimum lake level of 448' elevation, but the EA does not address the impacts that would occur if this level proves difficult or impossible to maintain due to future hydrological conditions (i.e., prolonged drought; nearby groundwater pumping, etc.). Finally, it appears in the EA that a 100-year flood event would overwash the RV Park and the Equestrian

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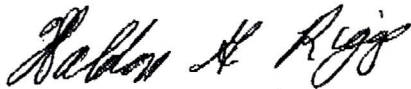
Center planned for the Proposed Action area; this could be a catastrophic pollution event to Lake Emma and the Sweetwater River should it occur.

- **Sloane Canyon Road Issues.** The EA makes no mention of the County requirement in SPA 88-007 that requires the owner of the sand plant property to dedicate to the County a total of 60' (feet) of Right-Of-Way width for Sloane Canyon Road through the entire site; and that this obligation has not been met yet by Sycuan. Sloane Canyon Road (improperly spelled throughout the entire EA) is a 4.2-mile public, County maintained dirt road that is a designated Circulation Element road in the County's General and Subregional Plans. The first three miles, beginning at the intersection with Dehesa Road, are located within the Proposed Action area; the remaining 1.2-mile segment that extends beyond the Proposed Action area provides the access for several private residences, for the California Department of Fish and Game's Sycuan Peak-Sweetwater River Ecological Preserve, and for other public uses. There are many possible impacts of the Proposed Action related to public safety, public road maintenance, and long term public access along the complete length of Sloane Canyon Road that have not been adequately examined in the EA. Furthermore, the EA does not include a study of the Sloane Canyon Road-Dehesa Road intersection, and impacts of the Proposed Action to its LOS rating during morning and evening peak traffic hours, so mitigation for this has not been considered.
- **Wildfire Hazard Issues.** The EA suggests that the Sloane Canyon/Olive Grove Development of the Proposed Action would require the construction of approximately 2 miles of a new electric utility distribution line through rugged, heavily vegetated terrain with very high wildfire risk. Construction, operation and maintenance of this electric line would create significant regional wildfire hazard impacts; additionally, there would be emergency response impacts for all of the residents of Sloane Canyon residents. The EA has not considered these impacts, and therefore no mitigation has been proposed.
- **General Plan/Subregional Plan/Community Plan Issues.** The EA does not include any consideration of impacts of the Proposed Action on the San Diego County General Plan, and on the Crest-Dehesa-Granite Hills-Harbison Canyon Subregional and Community Plans, yet these plans together determine the public infrastructures and environmental qualities that support and partly define the Proposed Action area. Several components of the Proposed Action conflict with adopted public policies or goals of these plans (i.e., acquire and use Sloane Canyon lands as a Regional Park; require development to set back from the streambeds and their banks and to protect water courses and associated sensitive resources; discourage the expansion of sewer service into the Subregion to limit growth and high density development). All impacts of the Proposed Action to existing public plans, as well impacts due to reduced property tax revenues for the County budget, need to be evaluated in an EIS so that the Sycuan Tribe can understand how its Proposed Action could impact surrounding public infrastructures and services (i.e., schools; roads; law enforcement; regional sewer capacity), and regional environmental qualities (i.e., patterns of preserved open space; rural community character; dark night sky; ground and surface water quality) that the Tribe itself enjoys now in the Proposed Action area. Mitigation for possible unintended consequences of the Proposed Action (i.e., closure of Dehesa school; undesirable non-rural growth outside Tribal land stimulated by sewer and water line extensions; reduced public law enforcement in the area; increased water pollution events) can only be developed if these impacts are considered in an EIS. Mitigation could include (perhaps) instances of selective, situation-specific, partial relinquishment of Tribal sovereignty.

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As stated before, this is not intended to be a complete overview of the EA, but is intended to show the need for a more detailed EIS, with mitigation measures outlined to reduce, if possible, the impacts on the residents and to preserve the quality of life we all strive for, and to promote the general welfare of the Subregion.

Respectfully submitted.



Waldon G. Riggs, Chairman
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