



County of San Diego

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Michael Baksh
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**RE: NOTICE OF PREPARATION OF A TRIBAL ENVIRONMENTAL IMPACT
REPORT/ENVIRONMENTAL ASSESSMENT FOR THE PAUMA
CASINO AND HOTEL PROJECT**

The County of San Diego has received the Notice of Preparation (NOP) of a Tribal Environmental Impact Report and Environmental Assessment (TEIR/EA) for the Pauma Casino and Hotel Project dated January 17, 2007. The purpose of this letter is to comment on the proposed scope and content of the TEIR/EA being prepared by the Pauma Band of Mission Indians (Tribe). The County is a political subdivision of the State of California responsible for the governance, health and welfare of the People of San Diego County. County comments will relate to issues within its statutory responsibilities. The County has also forwarded the NOP to certain community groups and local agencies and asked that they send their comments to you.

As an administrative matter, we request that future correspondence on this matter be directed to John Snyder, Director of Public Works, 5555 Overland Ave., Bldg. 2, MS O332, San Diego, CA 92123, with copy to Claudia Anzures, Chief Deputy County Counsel Office of County Counsel, 1600 Pacific Highway, MS A12, San Diego, CA 92101.

The County has reviewed the NOP and has identified certain issues that should be analyzed in the TEIR/EA. These issues are identified by subject matter and numbered consistent with the NOP and are set forth below.

A. Aesthetics

- 1) The County agrees that the potential impacts to the off-Reservation visual environment must be analyzed as stated in the NOP. In addition, the TEIR/EA should address all proposed lighting for the project and the potential impacts to the dark sky that could affect the Palomar Observatory and have a detrimental effect on astronomical research. The County suggests that all project outdoor lighting, including signage, comply with the Light Pollution Code (County Code Section 59.101-59.115.)
- 2) The Pala-Pauma Sponsor Group has initiated the application process through Caltrans to officially designate a portion of State Route 76 as a scenic highway. This process is anticipated to take a minimum of one year to obtain final approval from Caltrans. State Route 76 is currently eligible to be considered as a state designated scenic highway provided that specific scenic corridor protection measures are followed. One of these protection measures includes the prohibition of off-site outdoor advertising and the control of on-site outdoor advertising. At a minimum, the TEIR/EA should include a detailed narrative and visual analysis of all off-site signage (located on off-Reservation lands) with a specific emphasis on any potential visual intrusions to the State Route 76 viewshed and the surrounding area(s).

B. Agricultural Resources

The TEIR/EA should address if the project conflicts with existing zoning for agricultural use and/or with existing agricultural uses on off-Reservation lands. The TEIR/EA should identify and discuss all relevant land use issues including all identified Important Farmland Map Categories in the vicinity of the project, Williamson Act contracts in the vicinity of the project and agricultural preserves in the vicinity of the project. The TEIR/EA should include a discussion of the quantity and classification of the agricultural lands, resources and/or operations that may be impacted by the development of the proposed project and whether these impacts are significant. Direct impacts of project development such as grading, fire clearing and infrastructure required for the project, and indirect impacts such as interface and edge effects from the proposed development should be evaluated.

