

# Alpine AL-3

## Recommendation

CPG – Village Core Mixed Use (VC)  
Rural Commercial (RC)

Staff – Same as CPG

## Property Description

### Property Owner:

Viejas Band of Kumeyaay Indians and 35 others

### Property Size:

249 acres; 48 parcels

### Location/Description:

Alpine Community Plan Area;

Near I-8/Willows Road;

Outside County Water Authority boundary

### Existing General Plan:

Multiple Rural Use (1 DU/4, 8, 20 ac)

Travel Time (See Safety Element Table S-1):

Closest Fire Station — 5 minutes <sup>NOTE</sup>

[NOTE: Based on service from the Viejas Fire Station]

### Prevalence of Constraints (See following page):

● – high; ◐ – partially; ○ - none

◐ Steep Slope (Greater than 25%)

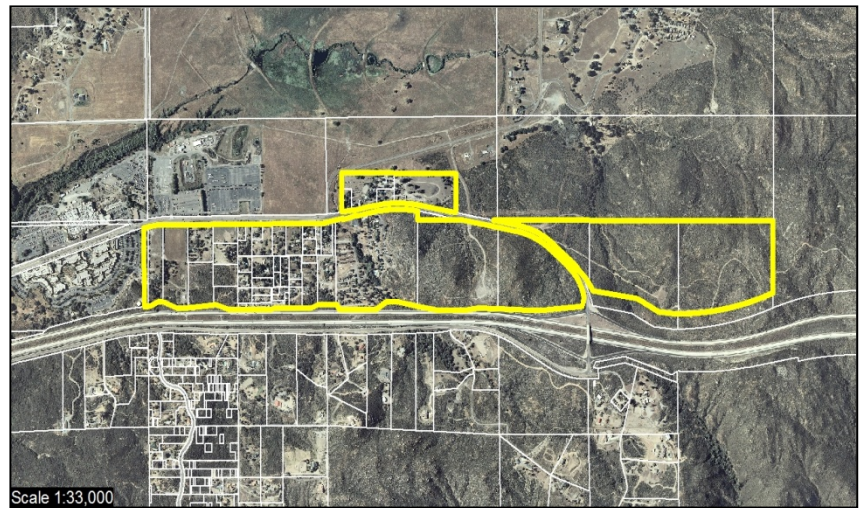
○ Floodplain

○ Wetlands

◐ Sensitive Habitat

◐ Agricultural Lands

● Fire Hazard Severity Zones



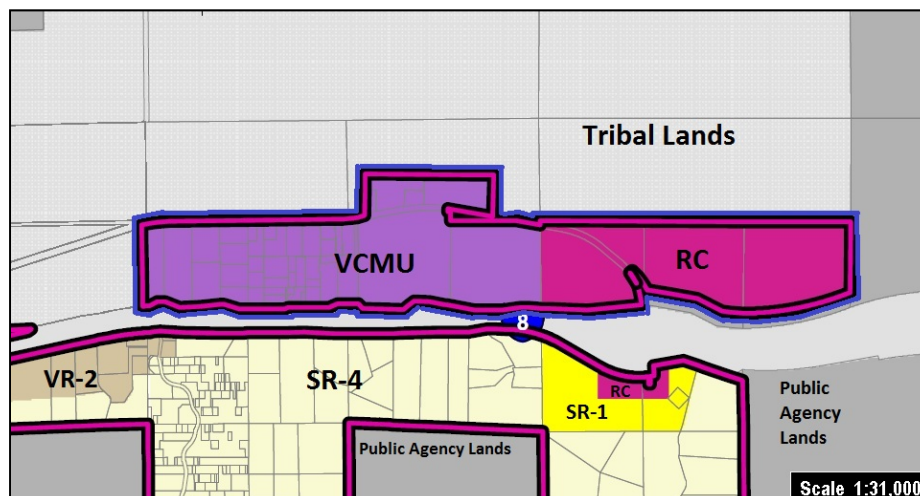
Aerial

Category	Recommendation	
	CPG	Staff
Designation	VCMU, RC	
Density	20 DU/ac <sup>1</sup> ; (Commercial)	10.9 DU/ac <sup>2</sup> ; (Commercial)
Maximum Potential Dwelling Units	1,505 <sup>3</sup>	808 <sup>3</sup>
Zoning Use Regulation	C34/C36/C44	
Lot Size (acres)	—	
Spot Designation/Zone	No	
Opposition Expected	Yes	

### Notes:

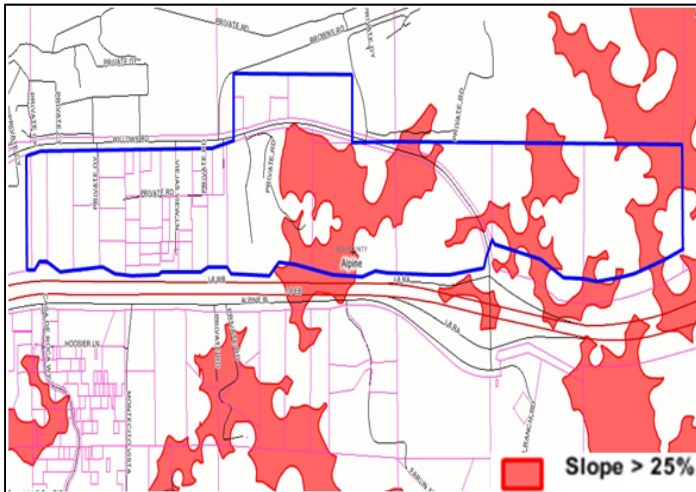
- 1) While 30 dwelling units per acre is the maximum allowed by the Mixed Use designation, the SEIR assumed a maximum density of 20 dwelling units per acre. The unit count is based on a 50/50 split between commercial and residential land uses.
- 2) The Staff Recommendation is based on a maximum density of 10.9 dwelling units per acre to retain community character and better accommodate areas with steeper slopes.
- 3) The unit count is based on a 50/50 split between commercial and residential land uses in the proposed Village Core Mixed Use area.

## Recommendation

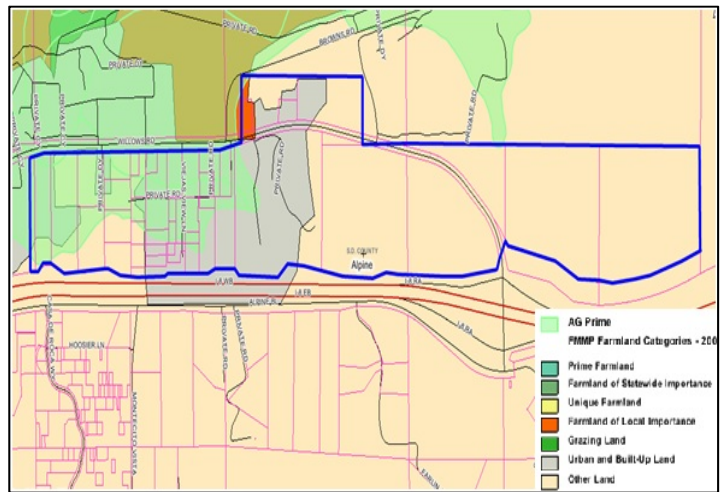


Draft Plan / Staff Recommendation

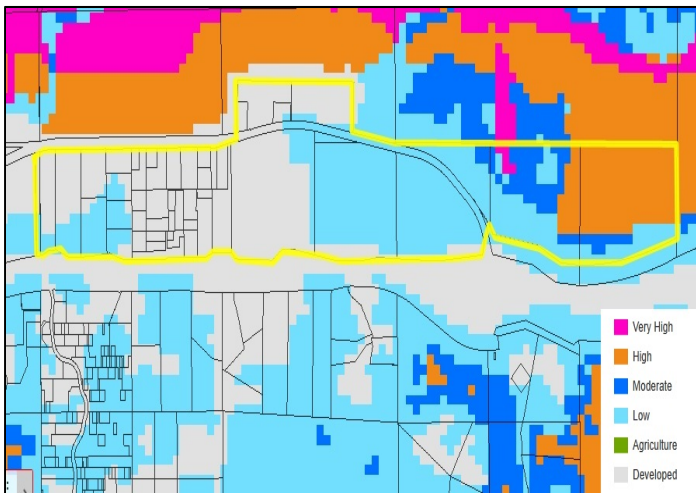
## Alpine AL-3



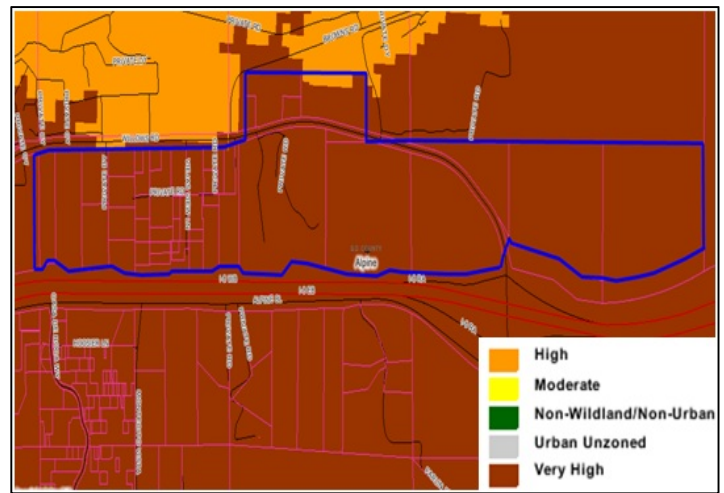
Steep Slope (Greater than 25%)



Agriculture



Habitat Evaluation Model



Fire Hazard Severity Zones

## Context

Alpine AL-3, located in the Alpine Community Planning Area near the intersection of Willows Road and I-8, contains 48 parcels that range in size from less than one acre to approximately 34 acres. Currently, the western parcels are developed with non-tribal rural and semi-rural residential housing while the eastern portion of the site containing the larger parcels is undeveloped. The site is outside of the County Water Authority boundary and is adjacent to the Viejas Casino, Resort and Outlet Center directly to the west with low density residences south of I-8 and relatively undeveloped land to the east. The property contains 52 acres of prime agricultural land, and is located almost entirely within the Very High Fire Hazard Severity Zone. This area is groundwater dependent with a five-acre minimum lot size per the County Groundwater Ordinance.

## Staff Review: Considerations for CPG/Staff Recommendation

- This area is phase one of a special planning analysis directed by the Board in August 2007
- Area has excellent direct access to Interstate 8 and easy accessibility to Alpine Village
- Higher density development makes the expansion of imported water and sanitary sewer services more feasible (see Atkins study)
- Generally strong community consensus; Viejas participated in process and supports plan
- Only eastern edge abuts Forest lands; area primarily surrounded by Interstate, private and Tribal Lands
- CPG supported change in road classification to four-lane Boulevard to support more intense patterns of development

Staff Review: Considerations for CPG/Staff Recommendation (continued)

The justification for General Plan consistency with Policy LU-1.2, Leapfrog Development, is provided in response to the Endangered Habitats League letter dated March 18, 2013.

Policy requirements	How Village designations are consistent
<b>LU-1.2 Leapfrog Development</b>	
1.2 (a) Consistency with Community Development Model (CDM).	The proposed expansion of the Alpine Village is consistent with the CDM. The various components of the CDM, as explained in the Land Use Element on page 2-8, are provided below along with the rationale for how this project is consistent.
i. As population growth continues in San Diego County, more compact development should occur within existing and planned communities	The community of Alpine has existed for a number of years. The community has developed over time, in a linear fashion, along the main thoroughfare of Alpine Boulevard. The proposed project continues this linear shaped development by applying higher land use intensities adjacent to the existing high density village uses in order to allow for continued growth in the existing linear-shaped community of Alpine. This expansion of the community along the existing transportation corridor allows continued access to the county's regional transportation network and is ideal for future growth.
ii. Village core where the highest intensities of development are located	The existing Alpine Village reflects a modified version of the CDM because Alpine is a linear village with a village core that extends along Alpine Boulevard. The highest intensities of development are in the village core at transportation nodes along Alpine Boulevard, such as where the Boulevard intersects Tavern Road, Arnold Way, and South Grade Road. The project would extend the village core area along Willows Road. This expansion would continue to locate the highest densities of development in the linear Alpine Village at major transportation nodes, such as where Willows Road meets Alpine Boulevard and Interstate 8.
iii. In unincorporated San Diego County, the ideal model has been modified with semi-rural areas surrounding the central core to reflect the existing pattern of development	Semi-rural densities are proposed to the north and south of the linear village core. These areas would provide support to the linear village core.  The project would also extend the semi-rural densities on the south side of the extended village core along the eastern end of Alpine Boulevard ending at eastern Willows Road. This area is south of Interstate 8.
iv. Realization that the ideal CDM is only achievable with a wide ranging and extensive transit network	The ideal CDM would not be achievable in Alpine because there is no existing transit network, nor are existing and planned densities sufficient to support an extensive transit network. The Alpine Village has developed in a linear fashion along a central transportation corridor with the most intensive land uses at transportation nodes.
v. In the County's CDM, the central core is surrounded by areas of lesser intensity	This project is consistent where applicable. Semi-rural densities are proposed around the village core on lands within the County's land use jurisdiction. However, portions of the extended village are adjacent to tribal lands that are outside of the County's land use authority.

Policy requirements	How Village designations are consistent
vi. The “Village” would contain the densest neighborhoods and a broad range of commercial and civic uses that are supported by a dense network of local roads containing bicycle lanes and walkways linking the neighborhoods with parks, schools, and public areas	The proposed project would extend the linear village core by applying the Village Core Mixed Use designation on lands along and north of Interstate 8. The current Village has a broad range of commercial and civic uses and this proposed extension of the Village core designation would allow for continued development of this range of commercial and civic uses. In addition, the commercial and civic uses can be supported by a dense network of local roads, bicycle lanes, and walkways that would link neighborhoods with existing parks, schools and public areas in the existing Village core area to the west.
1.2 (b) Provision of necessary services and facilities	Not applicable. This provision applies to new villages. This project proposes an expansion of an existing village.
1.2 (c) LEED Neighborhood Development certification	Not applicable, see 1.2(b) above



## Alpine AL-3: Additional Information



Aerial view showing non-tribal residential development that preceded the tribal gaming facilities

### Background

#### Board Direction

This area of consideration is phase one of a planning study directed by the Board of Supervisors on August 1, 2007 (12). This former FCI area is being evaluated due to the proximity (approximately 1,000 feet) of non-tribal semi-rural residential development to the tribal gaming facilities, and the impacts to those residents from the gaming facilities. The land use designations recommended by the Community Planning Group are the result of a planning process that involved a stakeholder group that included representatives from the community planning group and study area residents, along with a representative from Viejas.

#### Extension of Services

A study to identify the cost of providing imported water and sanitary sewer services to this area estimated the total cost to be approximately \$58.3 million (approximately \$45,300 per equivalent dwelling unit). This study evaluated densities up to eight dwelling units per acre and determined that the higher range of density would make provision of water and sewer service more economically feasible than lower density ranges. The higher densities make the provision of these services more economically feasible in part because the base fee for annexation to the San Diego County Water Authority (SDCWA) is partially based on a per-acre rate. In addition a Water Supply Assessment (WSA) would need to be prepared to determine the future availability of water supply to serve development of the area. [Refer to Willows Road Area Water and Sewer Feasibility Study, prepared by Atkins, January 27, 2012: <http://www.sdcounty.ca.gov/pds/advance/docs/FCI/WillowsRd-Water-SewerStudy.pdf> ]

*Executive Summary of study prepared by Atkins (January 27, 2012) to determine costs to provide imported water and sanitary sewer services to the area identified as AL-3. The complete study is provided as Appendix B-3 to Attachment B of the Staff Report.*

## **WILLOWS ROAD WATER & SEWER FEASIBILITY STUDY - EXECUTIVE SUMMARY**

**JANUARY 27, 2012**

The Willows Road Study Area consists of 255 acres, of which 60 acres are owned by private land holders and 195 acres are owned by the Viejas Band of Indians. No portion of the study area is currently included in the Tribe's Reservation Land Trust. The Willows Road Study Area was previously designated as Forest Conservation Initiative (FCI) land, which expired on December 31, 2010. The County plans to review the possibility of a General Plan Amendment for this area potentially converting the existing land use to commercial and / or higher density residential land uses.

The Feasibility Study includes engineering and financial evaluations of the following potential development scenarios:

1. 60 acres of low water use commercial development or single family at 2 units per acre
2. 255 acres of all commercial development
3. 255 acres of all residential use with densities ranging from 4 -8 units per acre
4. 255 acres of a mixed use residential and commercial development

Based on the study findings as summarized below, the County may chose to evaluate other land use scenarios and magnitude of developable area. This initial study is intended to lay the foundation for future refinement of a land use plan.

### **Water Supply Constraints Analysis**

The lack of ready access to a public water supply or ample groundwater supply, in addition to the absence of a sanitary sewer collection and disposal system, will constrain the area from cost effectively developing at various densities and acreages. A new connection to the Padre Dam Municipal Water District (PDMWD) offers the greatest potential to support development in the area but must overcome two major obstacles. First, the study area must annex into the San Diego County Water Authority (SDCWA) and PDMWD, either as a non-contiguous service area or as part of a larger contiguous area extending from the existing PDMWD boundary eastward along the Interstate 8 corridor to the study area. Second, the project would likely need to offset potable water demands to comply with the PDMWD's 2010 Urban Water Management Plan, since their allocation of imported water did not include this area. The local groundwater supply is limited and may only support an extremely low density concept, with extreme water conservation measures. For development of higher land use densities annexation and connection to the PDMWD water supply will be essential.

Due to the water supply constraints listed above, two distinct density concepts emerge as the most economically feasible: a high density concept supplied by imported water and a very low density concept utilizing local groundwater supply.

### **High Density Residential/Commercial Development**

Due to the high costs of a PDMWD connection and associated annexation fees, the most cost effective development scenarios are at the higher densities to better spread infrastructure costs.



The maximum density evaluated as part of this study was a Commercial Floor Area Ratio (FAR) = 3.2 and/or Residential Density = 8 Dwelling Units per Acre (DU/AC), and was determined to be the most economically feasible concept.

Typical combined water and sewer capacity fees to obtain service in San Diego County range from \$10,000 to \$20,000 per EDU. A range of commercial and residential development scenarios were evaluated for 60 acres and 255 acres of development in the study area and combined costs per equivalent dwelling unit (EDU) ranged from approximately \$17,000 to \$53,000 per EDU. The higher density scenarios considered both onsite wastewater disposal and offsite disposal to the San Diego County Sanitation District (SDCSD) Alpine Sewer Service Area, in conjunction with a PDMWD water supply. The relatively high range of capacity fee and capital costs for on-site water and sewer infrastructure reflects the high cost to obtain imported water and disposal of wastewater in an undeveloped area like Willows Road,

### Low Density Residential/Commercial Development

Groundwater is inadequate to satisfy normal water demands for a standard low density residential/commercial development. However, if landscape irrigation is eliminated and the non-consumptive use component of the indoor demand is returned to the local groundwater regime, the groundwater allocation may potentially become viable. For the low density concepts (Commercial FAR = 0.8 and/or Residential Density = 2 DU/AC) the most cost effective water supply may be local groundwater augmented with treated effluent from a new local wastewater treatment plant. For the local groundwater supply, a comprehensive groundwater investigation, including test wells, would be needed to ascertain actual quantity and quality of water which could be developed from on-site wells. A possible development scenario may include limited commercial retail development, no hotels or other intensive water uses, with extreme water conservation.

### Summary of Costs

- In summary, proposed development cost are included below for a range of development scenarios. The two density concepts with the lowest estimated fee and capital costs are shown in bold in Table ES-1. The high density concept (Commercial FAR = 3.2 and/or Residential Density = 8 DU/AC, or greater) will require a connection and annexation to PDMWD water supply and likely on-site treatment and reuse.
- The low density concept (Commercial FAR = 0.8 and/or Residential Density = 2 DU/AC), may be feasible if a sustainable groundwater supply including recharge from captured rainwater as well as highly treated wastewater can be developed. While this concept is estimated to have lower unit costs, it possesses greater uncertainty because the local groundwater supply yield and storage are unknown.

**Table ES-1 Summary of Estimated Cost per EDU**

Scenario	Sewer EDUs*	Local Supply & Metro Disposal	Local Supply & Local Disposal	Imported Supply & Metro Disposal	Imported Supply & Local Disposal
60 acres of Commercial (or 2 DU/AC)	125	\$24,800	\$ 25,600	\$44,000	\$52,800
<b>255 acres of Commercial</b>	531	N/A	<b>\$ 16,760</b>	\$30,300	\$32,600
255 acres of Residential (4 DU/AC)	1,020	N/A	N/A	\$42,100	\$22,900
<b>255 acres of Residential (8 DU/AC)</b>	2,040	N/A	N/A	\$31,300	<b>\$18,400</b>
255 acres of Mixed Use	1,286	N/A	N/A	\$45,300	\$24,600

\* 1 Sewer EDU = 240 gpd (Sewer) and 480 gpd (Water)

## Alpine AL-3: Correspondence Received

*Comments from Viejas Tribal Government supporting CPG / staff recommendation*



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Alpine, CA 91903  
#1 Viejas Grade Road  
Alpine, CA 91901

Anthony R. Pico, Chairman  
Robert "Cita" Welch, Vice-Chairman  
Anita R. Uqualla, Tribal Secretary  
Samuel Q. Brown, Tribal Treasurer  
Raymond "Bear" Cuero, Councilman  
Adrian Michael Brown, Councilman  
Ernest "Chuka" Pingleton, Councilman

Phone: 6194453810  
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viejas.com

March 13, 2013

Mindy Fogg  
County of San Diego  
Planning & Development Services  
5510 Overland Avenue, Suite 310  
MS O-650  
San Diego, CA 92123

Re: Forest Conservation Initiative: Proposed Land Designation – Willows Road Area

Dear Ms. Fogg;

This correspondence is in response to the proposal land designations which were forwarded by the Alpine Planning Group to the County's Department of Planning & Development Services. The Viejas Band of Kumeyaay Indians (Viejas Band) has a significant land management responsibility as a native sovereign nation over the trust lands of the Viejas Indian Reservation. In addition, the Viejas Band owns a substantial amount of fee simply land holdings in the east portion of the Alpine Planning Group's area. The Viejas Band facilitated community meetings and workshops with neighboring land owners regarding the land designations for the area of and surrounding Viejas Valley.

The Viejas Bands encouraged and supported the community collaborative approach of consensus generated from the meetings and workshops. The Viejas Band does have some concerns regarding changes injected during the review of the proposed community designation at the presentation to the Alpine Planning Group.

The Viejas Bands supports the following:



2. The rural commercial land use designation at the East Willows Road off ramp (both north and south side of the freeway). This designation places the higher volume traffic land use closer to the off ramp and reducing traffic impact on the east end of Willows Road.
3. Viejas envisions the rural land use designation as being zoned rural freeway commercial to support business opportunities for the commuting and traveling public.
4. The village core designation on the south side of Willows Road from the Outlet Center to Alpine Springs RV Park. Viejas supports this land use designation because:
  - a. It is compatible with the adjacent land use,
  - b. Allows for mixed residential and commercial use,
  - c. Compatible with existing land use of residential,
  - d. Follows land use planning principle of lower density as you move further from the East Willows Road off ramp.

The Viejas Band appreciates the opportunity to express our position regarding the proposed land designation for the eastern portion of Alpine. If there are any questions, please feel free to contact Robert Scheid, Director of Public and Community Relations ([rscheid@viejas-nsn.gov](mailto:rscheid@viejas-nsn.gov) or 619-659-5410) or Don Butz, Fire Chief ([dbutz@viejas-nsn.gov](mailto:dbutz@viejas-nsn.gov) or 619-659-2376).

Sincerely,

THE VIEJAS BAND OF KUMEYAAY INDIANS



Hon. Anthony R. Pico  
Chairman

*Comments from Endangered Habitat League opposing CPG / staff recommendation*  
March 18, 2013

*VIA ELECTRONIC MAIL*

Mindy Fogg  
Dept. of Planning and Development Services  
County of San Diego  
5510 Overland Avenue, Suite 110  
San Diego, CA 92123  
[mindy.fogg@sdcounty.ca.gov](mailto:mindy.fogg@sdcounty.ca.gov)

**RE: GPA 12-004; Forest Conservation Initiative (FCI) Lands General Plan  
Amendment (GPA) – Map Comments**

Dear Ms. Fogg:

The Endangered Habitats League (EHL) appreciates the opportunity to supplement its main comment letter (submitted under separate cover) with these comments on specific map issues. For your reference, EHL is Southern California's only regional conservation group and has been a stakeholder in County of San Diego planning efforts since 1993, serving on advisory committees for the MSCPs and the General Plan Update.

As a rule, the *lowest* rural densities should be applied to former FCI lands. Because these forest inholdings are often the most remote, most poorly served by infrastructure and services, most hazardous for fire, most GHG-intensive for auto use, and most ecologically intact, the Guiding Principles<sup>1</sup> direct development elsewhere. The

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- . Support a reasonable share of projected regional population growth.
- . Promote health and sustainability by locating new growth near existing and planned infrastructure, services, and jobs in a compact pattern of development.
- . Reinforce the vitality, local economy, and individual character of existing communities when planning new housing, employment, and recreational opportunities.
- . Promote environmental stewardship that protects the range of natural resources and habitats that uniquely define the County's character and ecological importance.
- . Ensure that development accounts for physical constraints and the natural hazards of the land.
- . Provide and support a multi-modal transportation network that enhances connectivity and supports community development patterns and, when appropriate, plan for development which supports public transportation.
- . Maintain environmentally sustainable communities and reduce greenhouse gas emissions that contribute to climate change.

former FCI lands exemplify the need to strictly limit “rural residential” subdivision so that the Guiding Principles are achieved and taxpayer subsidies for far-flung scattered housing are minimized. That said, the GPA has to respect areas of *existing* parcelization with appropriate designations. But additional subdivision outside of established rural residential enclaves should be avoided.

We are also concerned that development – commercial or residential – not “leapfrog” outside of existing villages and water and sewer boundaries. For example, casino facilities – sited without regard to the Guiding Principles – should not trigger such leapfrog.

In general, EHL supports the Environmentally Superior (“Modified”) Alternative. The purpose of these comments is to highlight those select areas where we find the Modified Alternative is deficient in meeting the Guiding Principles. Narrative comments below refer to enclosed exhibits.

### Alpine

In regard to the East Willows Village in the proposed project, it not needed to meet population or housing targets and would produce adverse traffic impacts. Nor is there any evidence that it is needed for nearby casino employees. It is outside of village and water and sewer boundaries and inconsistent with LU-1.2. Any intensified development here should await a demonstrable need for additional General Plan capacity.

While the County lacks the power to stop development on Tribal lands that undermines the County’s planning goals contained in the Guiding Principles, it *does* have the power to limit the damage by not using casino development as a rationale for permitting growth patterns that undermine these goals. Letting casino development dictate inconsistent land uses for adjacent areas will result in a vicious cycle as the adjacent development will eventually serve as an even *stronger* rationale for even *more* inconsistent development. Particularly where, as here, new growth-inducing urban

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- . Preserve agriculture as an integral component of the region’s economy, character, and open space network.
  - . Minimize public costs of infrastructure and services and correlate their timing with new development.
  - . Recognize community and stakeholder interests while striving for consensus.



infrastructure is introduced to accommodate this inconsistent growth, the character of the entire area risks being irrevocably altered in a manner that is fundamentally inconsistent with the County's overall planning principles. Even worse, a disastrous precedent would be set for justifying casino-adjacent General Plan amendments that are inconsistent with the Guiding Principles in remote rural areas *throughout* the County.

But if, despite these compelling reasons, the final plan includes any intensification (residential or commercial) outside of water and sewer boundaries, it must only do so as a logical contiguous extension of existing development on lands under County jurisdiction.

We look forward to continuing to work with the Department on this very important General Plan amendment.

Yours truly,

Dan Silver, MD  
Executive Director

*Comments from U.S. Forest Service opposing CPG / staff recommendation*

United States  
Department of  
Agriculture

Forest  
Service

Cleveland National Forest  
SO

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File Code: 1560

Date: March 18, 2013

Mindy Fogg  
County of San Diego, Planning and Development  
Services  
5510 Overland Avenue, Suite 110  
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To the County of San Diego:

The Cleveland National Forest appreciates the opportunity to comment on the potential impacts of the proposed General Plan Amendment for the former Forest Conservation Initiative (FCI) lands. The Forest's comments include comments previously submitted during the scoping period, on the basis of a meeting with San Diego County staff and review of the proposed land use maps, as well as comments on the recently released Draft Supplemental Environmental Impact Report (SEIR). We will begin by highlighting key issues and management challenges related to urbanization that were described in detail in our 2005 Forest Land Management Plan. These issues are common to all former FCI lands and are central to the potential environmental and public health and safety issues associated with increasing population density within and adjacent to the Cleveland National Forest. Next, issues particular to specific mapped areas of the plan are addressed. Finally, comments specific to the SEIR are addressed at the end of this letter.

Altogether, we are concerned about the potential environmental and public health and safety impacts that would be associated with increases in population density on former FCI lands, and we feel that these impacts are neither adequately disclosed in the Draft SEIR nor consistent with the objectives of the County of San Diego General Plan. Finally, we feel that the best way to protect both the environment and public health and safety on these lands would be to select the Modified Project Alternative along with a provision that buffer zones be set aside between private lands and the Cleveland National Forest.

#### **Comments Addressing all FCI Lands**

The rapidly increasing population of Southern California, the growing level of development adjacent to the Cleveland National Forest, and the resulting effects on the National Forest System (NFS) lands present some of our main management challenges. Higher density development in more remote areas leads to more Wildland/Urban Interface area that is at risk of and in need of protection from wildland fire. The combination of increased development and the need to protect these developed areas from fire and other natural events, such as flooding, will put increasing pressure on National Forest managers to alter landscape character to accommodate these uses. In the case of fire, suppression efforts to protect communities can lead to the buildup of fuels and eventually to higher severity, more damaging fires than would occur naturally.



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Furthermore, increasing the number of homes in an area increases the likelihood of human-caused fires, which can increase fire frequency to levels that harm ecosystems, wildlife, and waterways. Finally, we have concerns about the potential difficulty of evacuating people from remote subdivisions when wildland fires occur nearby on the Cleveland National Forest.

Urban development also puts pressure on public lands to provide urban support facilities (i.e. infrastructure) through special-use authorizations as private land options for development are exhausted. In the past, subdivisions have been established with the expectation that adjacent National Forest land can accommodate necessary water tanks, utilities, and defensible space to protect homes from wildfire. Instead, we now request that private lands be required to serve these purposes for future subdivisions through the blanket incorporation of buffer zones for new development projects on FCI lands. Along the same lines, where water delivery systems are not in place, the installation of wells for household use will lower the groundwater table beneath adjacent NFS lands, thereby degrading habitats for native plant and animal species. To avoid these impacts, we request that water delivery systems be established before enabling increased density on former FCI lands.

Road access presents several primary issues associated with increasing population density within or adjacent to the National Forest. The narrow, winding National Forest road system was built in the 1930s to support fire protection and does not meet typical County access standards. Moreover, the greater the population density of an area, the wider a suitable road would need to be. The National Forest roads generally lack rights-of-way where they cross private lands, which would need to be obtained in order to widen them or convey utilities. Furthermore, any improvements to Forest or County roads on the National Forest would require substantial planning and environmental compliance to be borne by project proponents, if permitted. Widening roads, building new roads, and increasing traffic to accommodate increasing population density in remote County areas would negatively impact plants and animals in a variety of ways, including direct mortality and habitat loss and fragmentation, and would also increase erosion and sedimentation of waterways.

Increased interface between developed private lands and National Forest boundaries also increases boundary management challenges including addressing occupancy trespass, clearly posting boundaries, and retaining clear title to NFS land. For example, in re-marking forest boundary after the 2007 fires, we discovered major encroachments adjacent to some subdivisions.

Another challenge associated with urbanization is the complex problem of National Forest access. For example, traditional points of public and administrative access to the National Forest have been lost as private land is subdivided. New landowners are often reluctant to accommodate access across their land. At the same time, residents living adjacent to the National Forests want convenient access, often resulting in the development of unplanned roads and trails. Unauthorized motorized vehicle use occurs and tends to be more of a management challenge on National Forest lands near private developments. As an example, illegal motor vehicle use of the Pacific Crest Trail has been reported from the Lake Morena area in the midst of the federally designated Hauser Wilderness.



Population growth within and surrounding the National Forests will probably be the single largest impact on National Forest recreation management in the foreseeable future. This growth has pushed urban development closer to and within the National Forest, in some cases directly adjacent to National Forest boundaries. Where NFS lands are or will be the boundary to this development, there will be pressure on these adjacent lands to provide diverse kinds of recreation. Higher density development would be expected to increase this pressure. Recreation on the National Forest is managed according to Recreation Opportunity Spectrum (ROS) to provide choices for people to recreate in settings that vary from urban to primitive. In general, the Forest Service would prefer zoning on adjacent private lands to be complementary with the land use zone and ROS on the NFS land. For example, where there is interface between private lands and NFS lands within a designated wilderness area or Inventoried Roadless Area, lower density County zoning would be the more complementary. Solitude, an increasingly rare opportunity, is a desirable feature in wilderness, but would be difficult or impossible to retain in the face of the increasing population and high density development.

Extensive habitat conservation planning efforts led by local government and conservation organizations have identified the need to maintain an inter-connected network of undeveloped areas or landscape linkages, which retain specific habitats and allow for maintenance of biodiversity and wildlife movement across the landscape and led to development of several multi-species habitat conservation plans. National Forest System lands are a core element of this natural open space network and will play an increasingly important role as additional habitat fragmentation occurs on surrounding private lands. Fragmentation is the breaking up of contiguous blocks of habitat by urban development features into progressively smaller patches that are increasingly isolated from one another and of less value for conservation. Higher density zoning allows for a higher level of development and, accordingly, fragmentation. Habitat loss and fragmentation are the leading causes of species extinctions, and the Cleveland National Forest has many populations of federally-listed threatened and endangered species that could be affected by increasing population density on former FCI lands. Meanwhile, invasive species generally enter new areas through human activity in those areas, and so increasing population density would result in the introduction of new infestations that would damage Forest resources and be costly to manage.

#### Comments Specific to Particular Locations

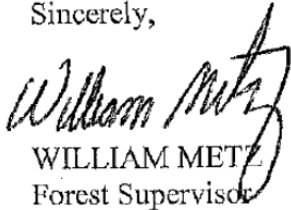
- **Alpine Community Planning Area (CPA).** The Forest is concerned about the density increases proposed for areas at the eastern end of Alpine, both south and north of Interstate 8. Road and water systems should be planned before enabling such increases, and the severe risk of fires starting along the freeway corridor and blowing westward into these areas should be addressed. In addition, Viejas Mountain was designated a Critical Biological Area of the National Forest by our Land Management Plan due to its unique botanical resources. The dense developments proposed for its perimeter and northeast of the Viejas Reservation, shown in yellow (SR-1) on the proposed maps, would be unlikely to effectively buffer this sensitive area from the impacts of residential development. This zoning also appears to be inconsistent with similar areas on the west side of Viejas Mountain, which are designated as RL-40. For the parcels that were re-designated as RL-20 since the last maps were made available, we would prefer that the RL-40 designation be retained instead to prevent the environmental and public health and safety impacts described above.

Conclusion

We appreciate the development and consideration of the Modified Project (Environmentally Superior) Alternative as described in Chapter 4.3. The sacrifice of less than 10% of the residential dwelling units of the proposed project would certainly be worth the resultant protection of resource conditions and reduction of wildfire risk to communities. Moreover, the areas where the lower densities would be located, as specified in the Modified Project Alternative, are precisely the areas where resource and wildfire concerns are greatest. As a result, we strongly support the adoption of the Modified Project Alternative rather than the Proposed Project. In addition, we encourage the County to set aside buffer zones between private and NFS lands to protect the environment and public health and safety and reduce conflict between adjacent land uses.

To conclude, we appreciate the consideration that you have given to our past concerns about this project and hope that you give similar consideration to our concerns about the Draft SEIR. We are very interested in working with the County of San Diego to achieve the objectives of the project that address environmental sustainability and risk avoidance. Thank you for the opportunity to comment on the potential impacts of the proposed project for the former FCI lands in the unincorporated areas of San Diego County. If you have any questions about these comments, please contact Jeff Heys, Forest Planner, at (858) 674-2959.

Sincerely,



WILLIAM METZ  
Forest Supervisor

cc: Gloria Silva

*Comments from community representative opposing CPG / staff recommendation*

**From:** Louis Russo [<mailto:louisfrusso@gmail.com>]  
**Sent:** Sunday, February 17, 2013 8:52 AM  
**To:** Fogg, Mindy; [Mindy.Fogg@sdcounty.ca.gov](mailto:Mindy.Fogg@sdcounty.ca.gov); Citrano, Robert  
**Subject:** Fwd: Public Comment, Former FCI lands, Alpine

Commissioners:

I am a 10 year resident of Alpine, an 8 year member of the Alpine Community Planning Group (ACPG) and a 6 year member of the San Diego Rural Fire District (SDRF) Board of Directors, currently serving as the Chairman of the SDRF board.

Over the years I have seen numerous factions, with divergent views, give input and opinions regarding density and development within the Alpine Community Planning Area. In particular, as both a parcel owner, resident and ACPG member, I watched closely the recent "community input" regarding the former FCI lands. After having participated in, and reviewed, the entire process, my recommendation is that you adopt the Modified Project Alternative (Environmentally Superior Alternative) for those lands within the ACPG boundaries, as well as for the entire East County Area.

My reasons for recommending this adoption are:

1. First, and foremost, it most closely aligns with both the wishes of the majority of residents as well as the provisions of the Alpine General Plan guiding principles and provisions. Although heavy influence was exerted by developers, contractors, realtors, etc. to obtain the most heavily dense designations possible (as one would expect), the overriding desires of the majority was to retain the rural nature of the former FCI lands, to protect these lands environmentally and to live within the infrastructure, present and proposed, within this area.
2. This alternative provides a reasoned, reasonable, plausible plan for limited growth within the former FCI lands while at the same time accommodating, to a reasonable degree, those parcel owners who wish to increase density, within reason, on their parcels. In fact, except for two parcel owners (both of whom were non-residents who simply owned land within the boundaries), the majority of the owners within the ACPG former FCI area were more than willing to be reasonable with their neighbors during the workshops conducted to provide you with the community recommendations. This is not to say there weren't shennigans at play, but in general, the residents were able to compromise, save two, to come up with a workable plan. The Environmentally Superior Alternative I recommend adoption of most closely aligns with the majority opinion of the residents.
3. As you are aware, there are severe infrastructure and environmental challenges in the ACPG boundary former FCI lands. In addition to lack of Padre Dam wate/ sewer, the existing water table limitations are known by all of the current residents. The new Viejas Resort will further strain this asset. In addition, there are very limited roads, little to no secondary access (as required by fire regulations), and those that do exist will need extensive widening, turnarounds, etc. in the event of any development. The Environmentally Superior Alternative appears to best address these issues.



4. The area of the former FCI lands within the ACPG boundary are, quite frankly, probably the greatest fire hazard area in the County. Although I have been here for the Viejas Fire, Cedar Fire and all subsequent fires, the current fire fuel maps show that the greatest concentration of fire fuel are almost directly aligned with the former FCI lands within the ACPG boundary. Most areas here are marked in bright red, the highest danger level, and in addition to no Padre Dam hydrants, etc., there are barely enough current roads to enable the protection of the existing structures. ANY development will require extensive County expenditures of funds to upgrade/increase infrastructure.

5. Finally, the Environmentally Superior Alternative is aptly named as most of the former FCI lands in the ACPG boundary abut directly with Cleveland National Forest. Although the slim, one vote, majority on the ACPG voted to go forward with greatly increased densities, to SR-1 and SR-2, in these parcels, it was never a viable recommendation. The Environmentally Superior Alternative recognizes this and provides greatly reduced densities as one approaches the National Forest. This not only evidences a high level of common sense, but is fully in alignment with the Alpine Community General Plan Guiding Principles, which was just updated by the community prior to contrator/developer/realtor rush to ignore during the former FCI lands workshops and public input. This Alternative "rights the ship" in this regard.

Thank you for your consideration.

Louis F. Russo