

# Alpine AL-11

## Recommendation

CPG – Semi-Rural 2 (SR-2)  
Rural Lands 40 (RL-40)<sup>1</sup>

Staff – Rural Lands 40 (RL-40)

## Property Description

### Property Owner:

Various

### Property Size:

200 acres; 5 parcels

### Location/Description:

Alpine Community Plan Area;  
North of Loveland Reservoir  
Near West Boundary TT/Montiel Truck TL;  
Outside County Water Authority boundary

### Existing General Plan:

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

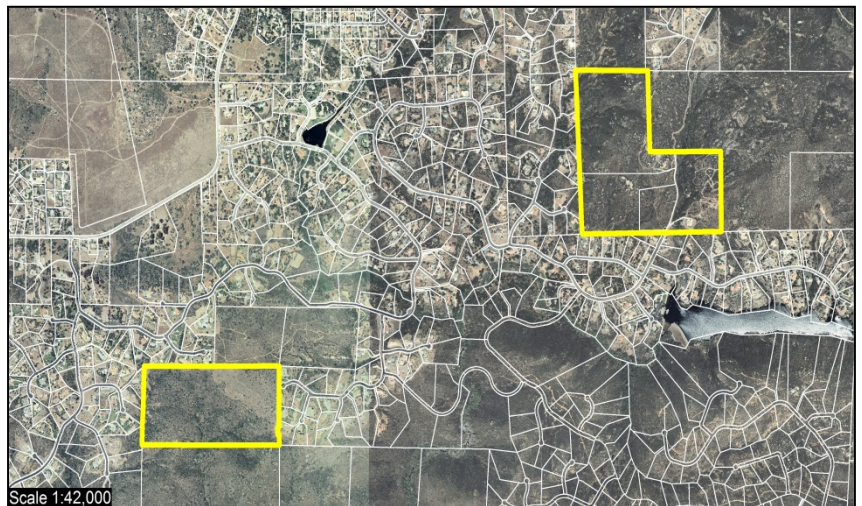
### Travel Time (See Safety Element Table S-1):

Closest Fire Station — 10-20 minutes

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

● – high; ◐ – partially; ○ – none

- ◐ Steep Slope (Greater than 25%)
- Floodplain
- ◐ Wetlands
- ◐ Sensitive Habitat
- Agricultural Lands
- Fire Hazard Severity Zones



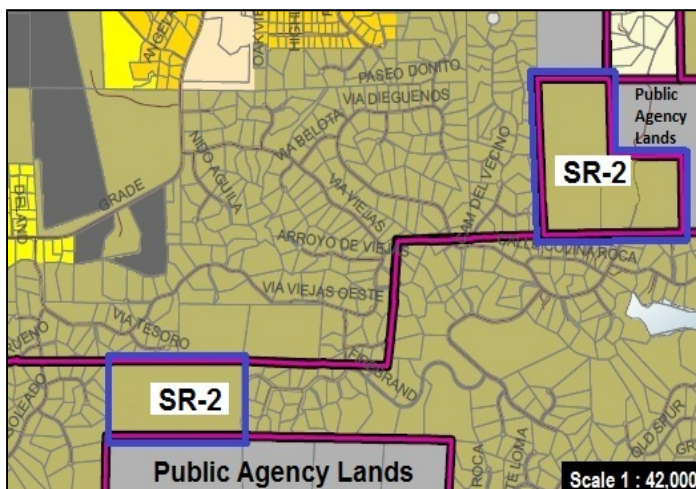
Aerial

Category	Recommendation	
	Draft Map	Staff
Designation	SR-2	RL-40
Density	1 DU/2, 4, 8 ac	1 DU/40 ac
Maximum Potential Dwelling Units	82	5
Zoning Use Regulation	A72	A72
Lot Size (acres)	4	4
Spot Designation/Zone	No	No
Opposition Expected	Yes <sup>2,3</sup>	Yes

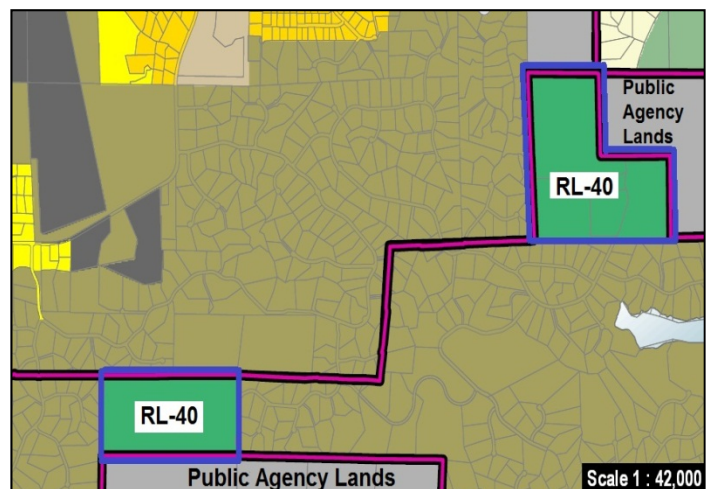
### Notes:

- 1) CPG revised recommendation September 19, 2013
- 2) Endangered Habitats League letter dated September 19, 2012
- 3) U.S. Forest Service letter dated March 18, 2013

## Recommendations



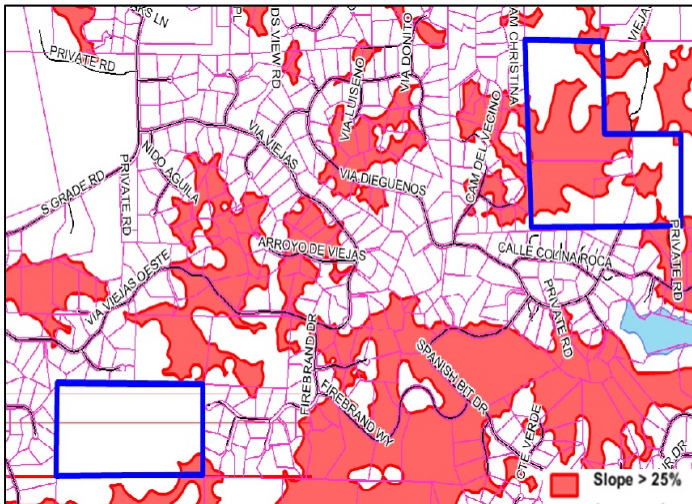
Draft Plan



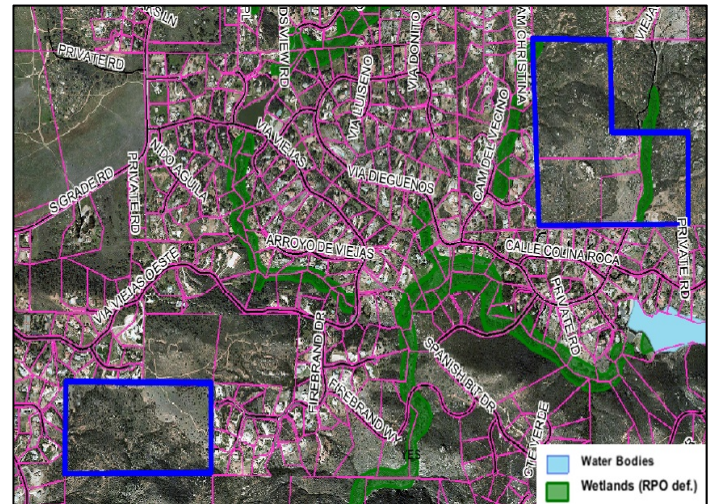
Staff Recommendation



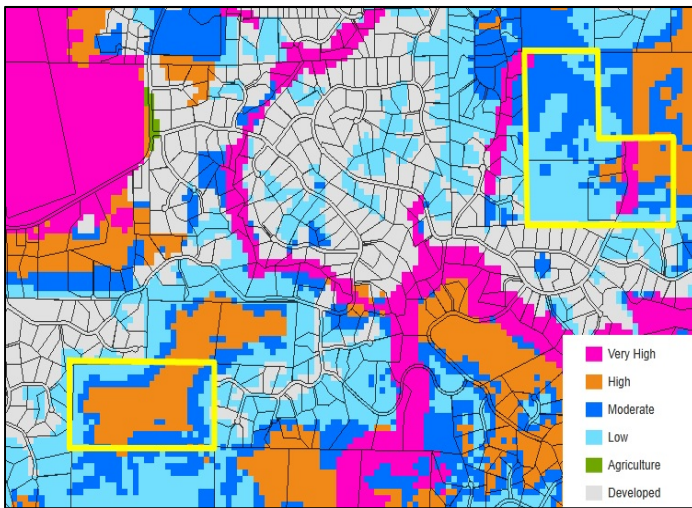
## Alpine AL-11



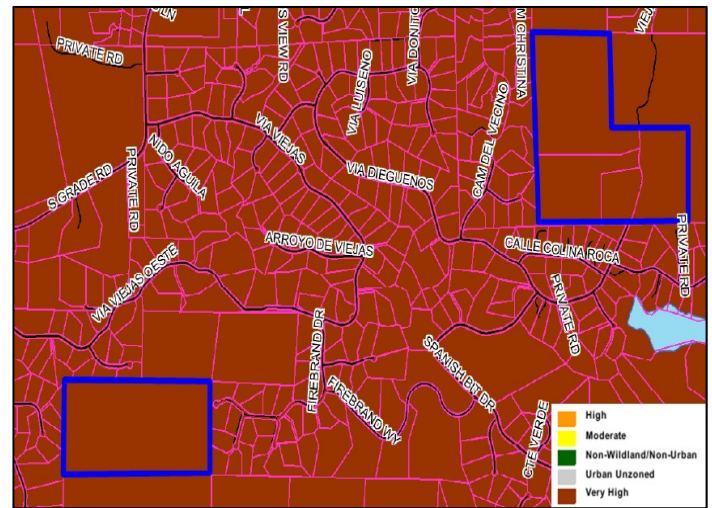
Steep Slope (Greater than 25%)



Wetlands



Habitat Evaluation Model



Fire Hazard Severity Zones

## Context

Alpine AL-11 consists of two separate areas consisting of five parcels ranging in size from approximately 10 to 75 acres for a total of 200 acres. The areas are located in the Alpine Community Planning Area approximately one-half mile north of Loveland Reservoir along West Boundary TT/Montiel Truck Trail outside the County Water Authority boundary. The two areas are located entirely within the Very High Fire Hazard Severity Zone approximately 10-20 minutes from the nearest fire station. These areas are also groundwater dependent with a five-acre minimum lot size per the County Groundwater Ordinance. Most of the 75-acre western parcel is constrained by High Value Habitat. Most of the four eastern parcels are constrained by either steep slopes, wetlands, or other High Value Habitat.

## Staff Review: Rationale for RL-40 Designation

- Most of the 75-acre western parcel is constrained by High Value Habitat.
- Most of the four eastern parcels are constrained by either steep slopes, wetlands, or other High Value Habitat
- A Rural Lands 40 density would minimize the potential for future subdivision in the Wildland/Urban Interface (refer to U.S. Forest Service letter)
- The eastern parcels are located at the western end of the Sweetwater Canyon, which is a very high fire risk area.

## Alpine FCI-11: Correspondence Received

*Comments from Endangered Habitats League*

**From:** Dan Silver [dsilverla@me.com]  
**Sent:** Wednesday, September 19, 2012 11:50 AM  
**To:** Fogg, Mindy  
**Cc:** Citrano, Robert; Farace, Joseph; Grunow, Richard; Murphy, Jeff  
**Subject:** Forest Conservation Initiative (FCI) Lands General Plan Amendment (GPA)

September 19, 2012

*BY ELECTRONIC MAIL ONLY*

Mindy Fogg  
Dept of Planning and Land Use  
5201 Ruffin Rd Suite B  
San Diego, CA 92123

**RE: Notice of Preparation for the Forest Conservation Initiative (FCI) Lands General Plan Amendment (GPA)**

Dear Ms Fogg:

The Endangered Habitats League (EHL) appreciates the opportunity to comment on the Forest Conservation Initiative (FCI) Lands General Plan Amendment (GPA) NOP. It is our expectation that the amendment will fully conform to the Guiding Principles of the General Plan and its objectives of *reducing* fire hazard, impacts to habitat, and infrastructure and service costs.

Forest inholdings are generally remote locations, removed from urban services and urban infrastructure, with high ecological integrity and high fire risk. Therefore, intensities of use (as reflected in assigned densities) should be at the *lowest* levels the Land Use Element allows, consistent with underlying parcelization. In other words, the number of potential new parcels should rarely increase above the baseline number of parcels, and then only in locations already substantially committed to such parcelization, so as to avoid "spot zoning." Mere adjacency to areas of existing higher density, or proximity to a roadway, is *not* sufficient rationale for up-planning. The needs to reduce fire hazard, preserve the environmental, and reduce service costs remain paramount. The current General Plan's limits of estate, semi-rural, and village development should be respected. Absent a demonstrable objective need to increase the housing capacity of the General Plan, there should be *no* expansion of Village or Semi-Rural densities into the former FCI lands. A density of 1:40 or less dense should be the default unless unique circumstances compel otherwise.

After reviewing maps produced by the Community Planning Groups (CPGs) and labelled as "May 2012 Draft Land Use Maps" on the DPLU FCI documents page, we are concerned over potential inconsistencies with the General Plan and its objectives. These mainly involve areas given a 1:10 density when 1:20 (or occasionally less) is more appropriate. SR-10 will inevitably produce a high degree of habitat fragmentation and habitat loss, especially considering the mandatory vegetation clearing – often acres – around each structure.

**Alpine:** The area of 1:10 south of Abrams Ridge should change to 1:20. South of the Commercial district and south of Old Ranch are three large blocks of unparcelized land that should be 1:40 or 1:80 rather than 1:10. In the area of Fusco, Burdoaks, Old Ranch and Granite Vista there should be a 1:20 density rather than 1:10. Note: This last area may be in Descanso. Note: There are two "Old Ranch" roads in different parts of the map.

In conclusion, the "May 2012 Draft Land Use Maps" maps contain unwarranted expansion of estate and ranchette parcelization. In the context of the DEIR, the May 2012 Draft Land Use Maps should be considered an alternative with greater impacts than the proposed project, which should better conform to the General Plan.

It is our privilege to work with DPLU toward a successful FCI Lands Amendment. Also, it would be appreciated if you could acknowledge receipt of these comments by a reply to this message.

Yours truly,  
Dan

Dan Silver, Executive Director  
Endangered Habitats League  
8424 Santa Monica Blvd., Suite A 592  
Los Angeles, CA 90069-4267



*Comments from U.S. Forest Service*

United States  
Department of  
Agriculture

Forest  
Service

Cleveland National Forest  
SO

10845 Rancho Bernardo Rd.  
Suite 200  
San Diego, CA 92127-2107  
(858) 673-6180  
(858) 673-6192 FAX  
(800) 735-2922 CRS

File Code: 1560

Date: March 18, 2013

Mindy Fogg  
County of San Diego, Planning and Development  
Services  
5510 Overland Avenue, Suite 110  
San Diego, CA 92123

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.

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.

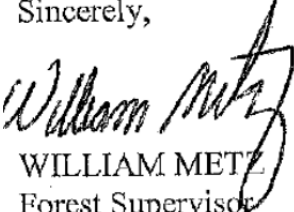
Extensive habitat conservation planning efforts led by local government and conservation organizations have identified the need to maintain an inter-connected network of undeveloped areas or landscape linkages, which retain specific habitats and allow for maintenance of biodiversity and wildlife movement 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.

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