

Alpine AL-5

Recommendation

CPG – Village Residential (VR-2),  
Semi-Rural-1 (SR-1), SR-2, SR-4<sup>1</sup>

Staff – Village Residential (VR-2),  
SR-1, SR-4, SR-10

Property Description

Property Owner:

Multiple owners

Property Size:

696 acres; 83 parcels

Location/Description:

Alpine Community Plan Area;

South of I-8/Willows Road;

Outside County Water Authority boundary

Existing General Plan:

Multiple Rural Use (1 DU/4, 8, 20 ac) & General  
Agriculture (1 DU/10, 40 ac)

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

Closest Fire Station — 5 to 10 minutes

Prevalence of Constraints (See following page):

● – high; ◐ – partially; ○ - none

◐ Steep Slope (Greater than 25%)

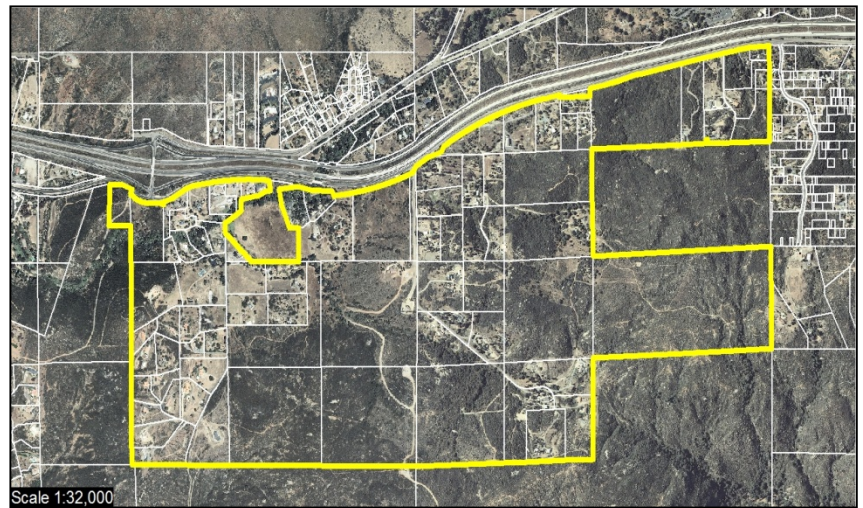
○ Floodplain

○ Wetlands

◐ Sensitive Habitat

◐ Agricultural Lands

● Fire Hazard Severity Zones



Aerial

Category	Recommendation	
	Draft Map	Staff
Designation	VR-2, SR-1, SR-2, SR-4	VR-2, SR-1, SR-4, SR-10
Density	1DU/1,2,4 ac	2 DU/ac; 1DU/1,4,10 ac
Maximum Potential Dwelling Units	401	495
Zoning Use Regulation	A70 (Limited Agriculture)	A70 (Limited Agriculture)
Lot Size (acres)	Various	Various
Spot Designation/Zone	No	No
Opposition Expected	Yes <sup>2,3</sup>	Yes <sup>2</sup>

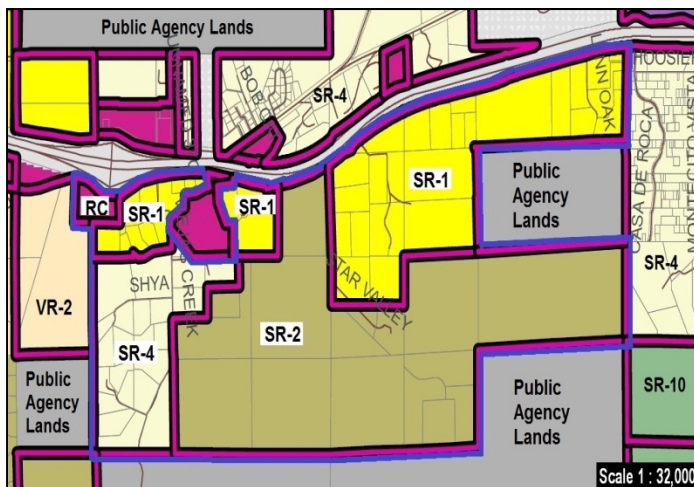
Notes:

1) CPG revised recommendation September 19, 2013

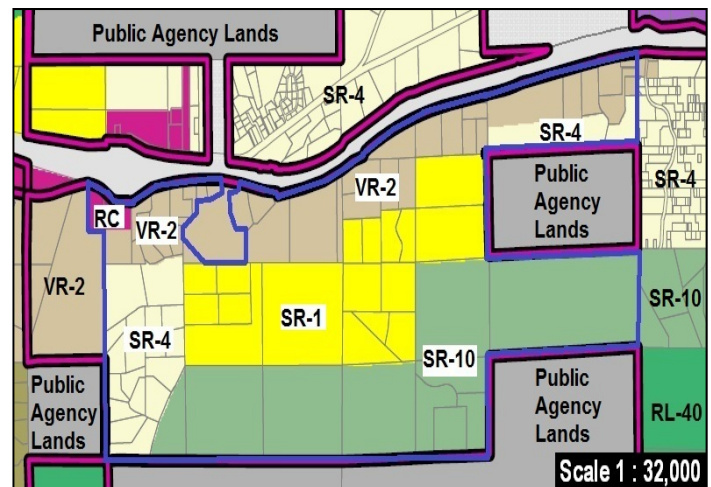
2) Property owners are divided in their recommendations

3) U.S. Forest Service, Endangered Habitats League

Recommendations

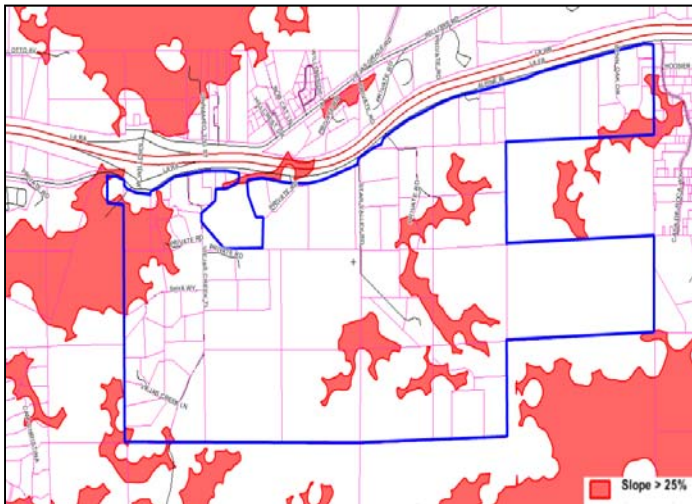


Draft Plan

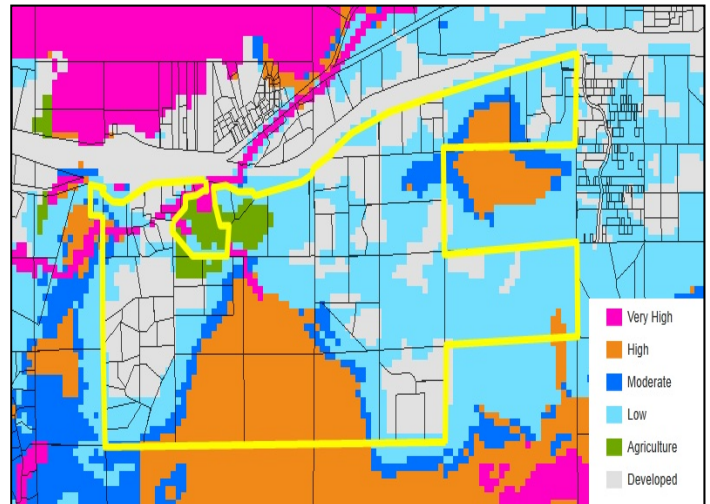


Staff Recommendation

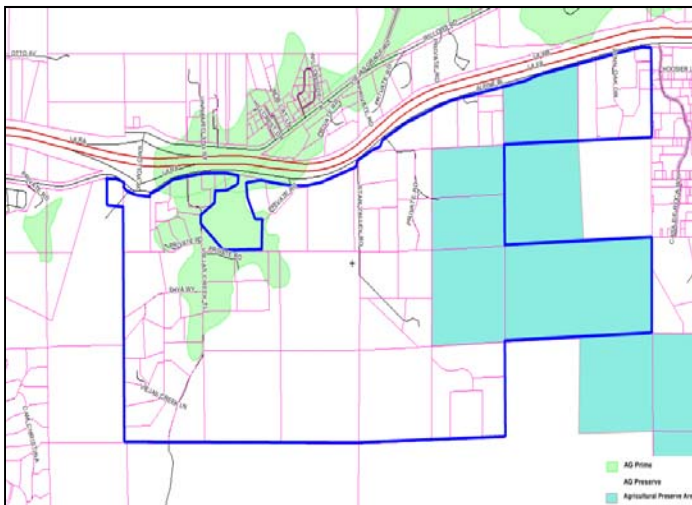
Alpine AL-5



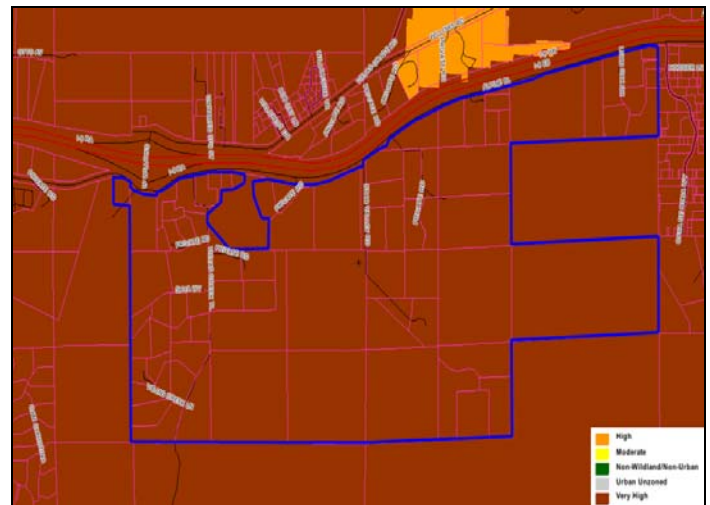
Steep Slope (Greater than 25%)



Habitat Evaluation Model



Prime Agricultural Lands and Agricultural Preserves



Fire Hazard Severity Zones

Context

Alpine AL-5, located in the northeastern Alpine Community Planning Area near the intersection of Willows Road and I-8, contains 83 parcels that range in size from less than one acre to 80 acres. The subject properties are outside of the County Water Authority boundary and are located south of Viejas Casino and Resort as well as the Viejas Outlet Center. The majority of the site is developed with low density rural residences while the eastern portion is relatively undeveloped with about 179 acres of agricultural preserve. Approximately one-fifth of the area is composed of High Sensitivity Biological Habitat associated with wetlands and oak woodlands. There are over 50 acres of prime agricultural lands. Area is located 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: Rationale for Staff Recommendation

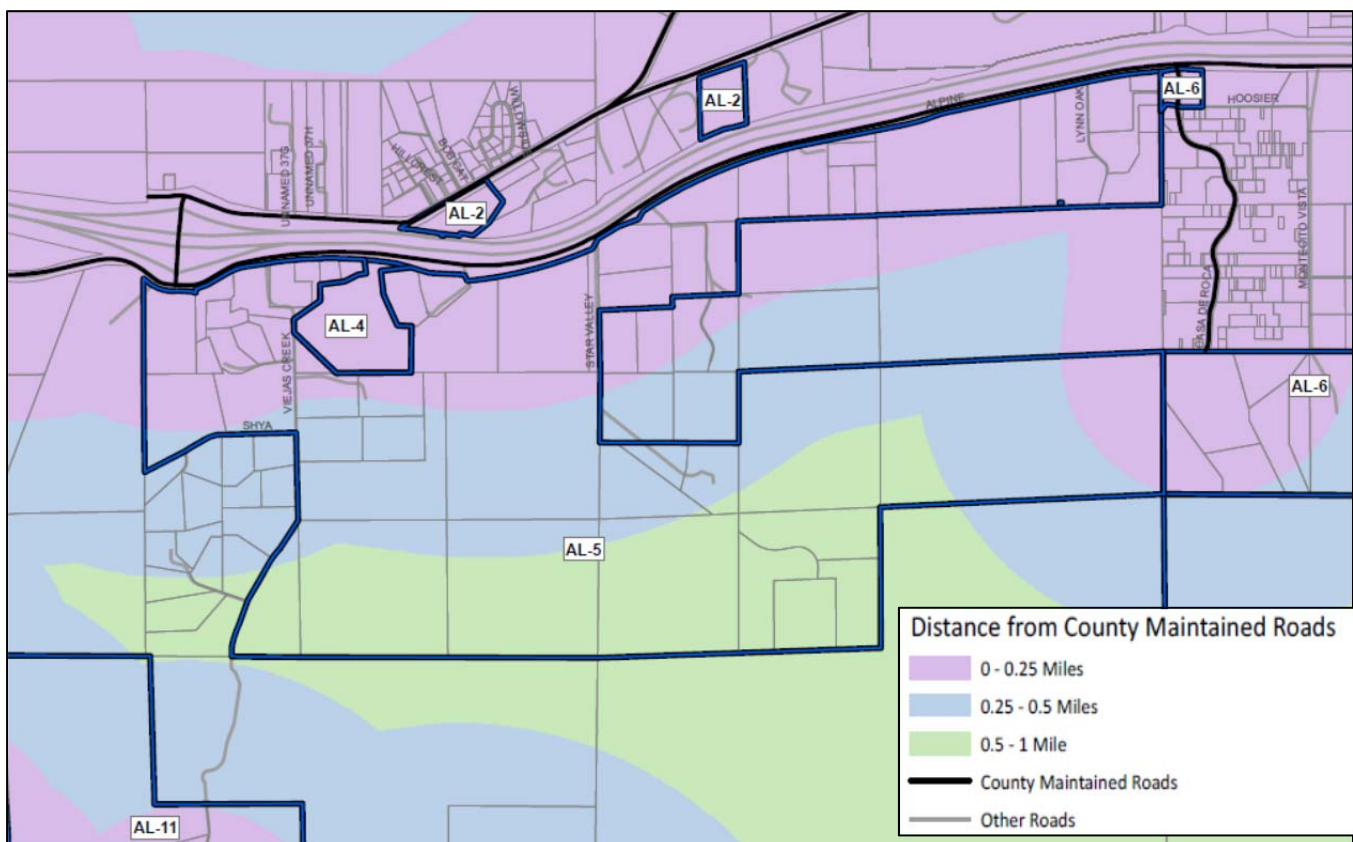
- Alpine CPG supports a mix of residential densities, which are reflected on the Draft Plan partially based on requests of individual property owners that do not consider the area as a whole. As a result, the Draft Plan assigns densities haphazardly without regard to the General Plan Community Development Model, potential impacts to adjacent National Forest lands, or the feasibility of providing imported water services to the area
- The Staff Recommendation is more consistent with the Community Development Model because higher densities are assigned adjacent to the Village, while lower densities are assigned adjacent to National Forest lands
- The VR-2 designation is limited to parcels that are either directly accessible from or very close to a public road (Alpine Boulevard Boulevard), while the lowest densities to ensure the density is assigned according to the subdivision potential
- Area is dependent on groundwater (five-acre minimum lot size); higher densities would require imported water resource



## Staff Review: Rationale for Staff Recommendation (continued)

The Staff Recommendation removes the Semi-rural 2 designation; therefore, only properties in this area with a Village Residential 2 or a Semi-rural 1 designation would require imported water. Providing imported water services would be most efficient under the Staff Recommendation for the reasons identified below.

- The VR-2 and SR-1 designations are within one-half mile from Alpine Boulevard to facilitate the provision of imported water infrastructure. The area is already subdivided into parcels ranging from one to 40 acres. Running imported water infrastructure eastward along Alpine Boulevard would be the most efficient route because the need for utility easements through developed private parcels would be minimized.
- In addition to the cost per dwelling unit, extension of water services will require annexation into the San Diego County Water Authority (SDCWA) and a connection to the Padre Dam Municipal Water District. The annexation costs are based on a per-acre rate, which would cost an additional \$7,000 per acre (see pages 4 to 5 of the Water and Sewer Feasibility Study prepared by Atkins for the Willows Road corridor <http://www.sdcountry.ca.gov/pds/advance/docs/FCI/WillowsRd-Water-SewerStudy.pdf>). Based on the per acre cost, extending imported water infrastructure in areas assigned a SR-2 designation would be the least efficient.



Distance from a County-Maintained Road

## Alpine AL-5: Correspondence Received

*Community representative supporting the SR-1 and SR-2 densities*

Travis Lyon

2139 South Grade Road

Alpine, CA 91901

619.952.8607

travis.lyon@gmail.com

March 18, 2013

Supervisor Dianne Jacob  
County of San Diego  
1600 Pacific Highway  
San Diego, CA 92101  
dianne.jacob@sdcounty.ca.gov

Dear Supervisor Jacob,

I am writing to comment on the upcoming General Plan Amendment which will address the former Forest Conservation Initiative land, and specifically the land to the south of Interstate-8, just east of Alpine's village core. I am writing as a resident of Alpine and head of household for a family of four. However, I am confident that my comments resonate with a large percentage of your constituents here in Alpine.

I am writing because I feel very strongly that the most significant long term development necessary for Alpine to reach its potential as a full service community is the construction of a comprehensive high school. This is one of the last aspects of a community that Alpine is sorely lacking. Alpine is very close to student population benchmarks that demonstrate the need for a high school. We can't make decisions as a community that will stifle stable and appropriate growth.

The logical pattern of growth for Alpine is in the area of the former FCI lands along the south side of Interstate 8. I support density designations of SR-1 and SR-2 in this area, which are consistent with the density throughout the majority of our community. Most of the existing homes in this area are situated on parcels ranging from 1-4 acres. I do not believe that the development of large tracts of land in that area into similar sized 1, 2 and 4 acre lots is unfair to the current residents. However, I do believe it would be unfair to the rest of the community to impose low density zoning to this area that would effectively prevent its long term development and jeopardize the eventual development of a high school.

We need more homes that are affordable and lot sizes that are manageable for families with children. Large 4+ acre ranches are not viable for most families. SR-1 and SR-2 zoning in this area would allow for homes that would attract young middle class families to Alpine. Influx of these type of households are essential for any community, but even more so for a community at crossroads such as ours.

Please consider the community as a whole when you make your decision. Please keep our growth on track for a high school.

Sincerely yours,



Travis Lyon

*Property owners supporting the Semi-Rural 1 or higher densities)*

**From:** Charles Jerney [cajerney@yahoo.com]  
**Sent:** Tuesday, March 12, 2013 1:12 AM  
**To:** Fogg, Mindy  
**Subject:** Former FCI lands

Mindy Fogg,

My name is Charles Jerney I live on Star Valley rd. in Alpine. My family has resided in Alpine since 1952. I have seen many changes and have observed many not so intelligent moves in California in the past several years. Currently there is a push by a few new residents living in the area East of Alpine to impose limitations on long term property owners attempting to curtail development. My family is not currently considering any type of development; however, now is the time to change density rules and regulations which will allow my children or Grandchildren to develop family property in the future, if they should so desire. The community of Alpine will need to grow in the future in order to remain viable. Development will require the annexation of the area East of Alpine into the water district and installation of city water piping into the area. Currently there is a county requirement of five acres of land in order to secure a well permit. There is however the possibility of creating satellite water districts within the former FCI lands. My family is not considering this course of action either. The crux of my message is that the 68 acres currently owned by my family within the former FCI lands area consisting of 4 parcels and containing two residences will not be further developed within the foreseeable future. The comments by three current members of the ACPG against the changes in density of the former FCI lands are not founded in reality. My long time friend and neighbor to the East of me sharing a common boundary is also not planning to develop his 468 acres. Roadway changes at this time and calling for infrastructure seem to be placing the cart before the horse, so to speak. Larger parcel property owners are attempting to make needed changes for the future. The Long Term future. Not the short term future. As development occurs changes will accompany the development at the time. To impose unrealistic development limitations and severely limiting infrastructure restrictions which are currently being proposed by a few residents living on 1 to 2 acres within the former FCI lands at this time; are to kill any future Alpine may have. I also have a question as to how an individual with 1.4 acres of land located on CasaDeRoca gained a water well permit. This same person is one of the more vocal in opposition to planned future development. If you have any questions feel free to contact me.

Charles A. Jerney  
1525 Star Valley rd.  
Alpine, Ca. 91901



*Property owners supporting the Semi-Rural 4 or lower density*

**From:** Dave Henderson [davesculpt@gmail.com]  
**Sent:** Sunday, March 03, 2013 7:22 PM  
**To:** Citrano, Robert  
**Subject:** Increased Land Use Densities

Dear Mr Citrano, I live in Alpine and was just informed of a Tuesday meeting that's to be held to discuss former FC land densities.

I have attended a number of meetings with the Alpine Planning Group and was under the impression that this issue had already been discussed with recommendations then made, (SR4 etc.)

In any event, I would respectfully like to strongly recommend that no further *increases* in land use densities by made than what has already been outline by the Alpine Planning Group.

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Sincerely,

Dave Henderson  
 1724 Casa De Roca Way

**From:** Jesse & Sandra Purczynski [jesandsand@gmail.com]  
**Sent:** Monday, March 04, 2013 10:45 AM  
**To:** Citrano, Robert  
**Subject:** Former FCI Lands

Dear Mr. Citrano,

I am writing, as many of my neighbors are writing this, because I understand that you are being constantly assailed by certain people to increase densities in former FCI lands in the Alpine area. My husband & I attended the consensus meeting that you held in Alpine about densities. We personally would have preferred to have our area (Casa de Roca) be SR10 but in the spirit of reaching a consensus we agreed to SR 4. Please believe that just because you have not heard from many people who want the densities to remain low, that they are not out there. We are out there! They many not have the luxury of time and money to constantly attend meetings week after week and spend time on emailing and letters. The truth is we are worn out with this as I'm sure you must be. We have jobs and families that out of necessity must take priority over campaigning for what we really want which is to keep our area rural with the least impact of density.

PLEASE we want low density!

Sincerely,  
 Jesse & Sandra Purczynski  
 1829 Casa De Roca Way  
 Alpine, CA 91901

**From:** Maria Banuelos [terebn64@gmail.com]  
**Sent:** Sunday, March 03, 2013 6:00 PM  
**To:** Citrano, Robert  
**Subject:** FCI lands in ALpine

Dear Mr Citrano,

As an Alpine resident who would be affected directly by the increased density proposed by those who have a direct interest in getting this designation pushed trough in FCI lands, I am encouraging you to not support any proposal designed to increase density in our community. When we make the decision to buy property in alpine, we accept any property we purchase with its current designation not expecting to have a different use/zoning. not ours or our neighbors. Those pushing to have higher use of their land by subdividing it keep bringing up as if they feel they are entitled to higher profits at the expense of their neighbors. Increased traffic, increased population, decreased safety,when the infrastructure does not support it would be the result if change in designation is passed, The issue had already been heard and agreed upon not to allow this. Please, do not support any changes that allow increased density. Thank you.

respectfully,

Maria Banuelos,  
[619-829-9334](tel:619-829-9334)

Comments on Forest Conservation Initiative General Plan Amendment Draft Supplemental  
Environmental Impact Report

These comments are sent to the County of San Diego Planning & Development Services:

We have reviewed the sections of the subject report as they pertain to the Alpine Planning Area and wish to make the following comments:

1. We do not support the Modified Project Alternative because we believe that there is a better alternative that is more rational, satisfies the interest of most of the Alpine residents and is environmentally better than this alternative or the Working Draft Plan proposed by the General Plan Amendment.

The Modified Project Alternative seeks to reduce environmental impact of the General Plan Amendment by limiting growth in focus areas A-1, A-2, and A-4 to the levels of the Former FCI (1 dwelling per 40 acres) but ignores focus area A-3 which is the second largest contributor of net increase average daily trips in this report. Increased density in these four areas impacts the environment by requiring major road improvements and extension of water, sewer, and related utilities. Focus area A-5 also remains the same as the proposed General Plan Amendment as the environmental consequences of development at the level proposed are almost insignificant.

We propose a new Environmentally Exceptional Project Alternative that is superior to the Working Plan and all alternatives analyzed in the SEIR. We would describe this alternative as follows.

- For areas A-1 through A-4 allow development at the SR-4 level which is largely consistent with the existing General Plan Update. This will allow 1 dwelling per 4, 8 or 20 acres depending on slope. Although a preferable level of development would be 1 dwelling per 5 acres, this choice is not available in the Land Use Density policy. However, the Alpine Community Plan prohibits extending water and sewer utilities beyond the existing service area, and the Groundwater Ordinance sets a limit of 1 dwelling per 5 acres in this section of the County. When these two factors are applied to areas A1 thru A-4, the maximum density will effectively be 1 dwelling per 5 acres.
- For Area A-5, allow development in accordance with the General Plan Amendment which is based on the Working Draft Plan proposed by the Community Planning Group and is the same as the Modified Project Alternative. This will permit development of 1 dwelling per 20 or 40 acres as requested by the community.

#### IMPACTS

Development at the 1 dwelling per 5 acre level for areas A-1 thru A-4 without extending public water and sewer utilities will yield major cost savings and significant reductions in environmental impacts. At steeper slopes, the number of dwellings will be governed by the Land Use Density designator, i.e. 1 dwelling per 8 acres for slopes over 20% or 1 dwelling per 20 acres for slopes greater than 50%.



Comments on Forest Conservation Initiative General Plan Amendment Draft Supplemental  
Environmental Impact Report

The roadway impacts under this new Environmentally Exceptional Project Alternative will also be greatly reduced. The current General Plan anticipates an increase of 6,949 average daily trips (ADT) for areas A-1 through A-4 over the former FCI level of development. The proposed Modified Project Alternative shows no increase Land Use Density and no increase in ADT's as compared to the Former FCI levels for areas A-1, 2, and 4, while the ADT's for area A-3 will increase by 16,767. This yields a total increase in ADT's for the Modified Project Alternative of 16,767. We estimate that our proposed Environmentally Exceptional Project Alternative will show a total increase in ADT's of less than 7,000 when the Groundwater Ordinance limits are superimposed on this area.

The result is that the number of ADT's under the Environmentally Exceptional Project Alternative as described herein will be less than half of the Modified Project Alternative described in the SEIR, and there will be a dramatic reduction in the environmental impact by eliminating the need to extend water and sewer utilities or develop more roadway capacity. At the same time, most of the residents and property owners will be allowed to develop their property at the levels they originally requested. Wildlife will also benefit by the lower density development distributed throughout the focus areas which will allow wildlife corridors to continue to exist while reducing fuel load for potential future wildfires.

#### CONCLUSION

The San Diego Planning & Development Services should explore more deeply this proposed Environmentally Exceptional Project Alternative because it:

- offers the least impact of the all alternatives proposed
- allows growth at the levels requested by most of the Alpine residents who participated in developing the proposed General Plan Amendment
- avoids changes to the Alpine Community Plan
- reduces wildfire fuel loads and protects wildlife by providing a widely distributed low density development as opposed to higher density development throughout a major section of the Plan area.

These comments are prepared and submitted by:

Tom & Judy Myers

1523 Montecito Vista

Alpine, CA 91901

Email: tomandjudy@rcn.com



**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



*Comments from Endangered Habitats League opposed to densities that require Imported Water services*

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**

We generally concur with the approach of the Modified Alternative except for a major defect south of I-8 and surrounding Star Valley Road on the south, east, and west. Due to large, un-subdivided parcels of up to 80 acres in size and the Guiding Principles goals referenced above, this area should be RL40 rather than SR2. Subdivision of intact, relatively remote land into dispersed estate lots would place more residences at fire risk, fragment habitat, increase service costs, and increase GHG emissions for the resulting long-distance commuters. Of note is that the Conservation Subdivision, which could in a limited way mitigate the damage, is not required for SR2.

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 opposed to densities that require Imported Water services*



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.

#### Comments Specific to Particular Locations

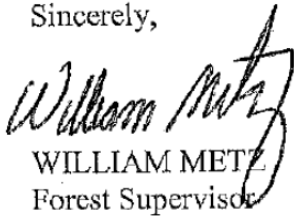
- **Alpine Community Planning Area (CPA).** The Forest is concerned about the density increases proposed for areas at the eastern end of Alpine, both south and north of Interstate 8. Road and water systems should be planned before enabling such increases, and the severe risk of fires starting along the 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