

Appendix A

Notice of Preparation



County of San Diego

MARK WARDLAW
DIRECTOR

PLANNING & DEVELOPMENT SERVICES
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KATHLEEN A. FLANNERY
ASSISTANT DIRECTOR

NOTICE OF PREPARATION DOCUMENTATION

DATE: August 30, 2018

PROJECT NAME: Alpine Community Plan Update

PROJECT NUMBER(S): PDS2016-GPA-16-011

PROJECT APPLICANT: County of San Diego – Planning & Development Services

ENV. REVIEW NUMBER: PDS2018-ER-18-00-002

Summary

The project comprises a comprehensive update to the Alpine Community Plan proposed by the County of San Diego (County). A Supplemental Environmental Impact Report (SEIR) will be prepared in order to analyze and disclose the environmental impacts of the project. The SEIR will tier from the General Plan Update (GPU) Program EIR (PEIR), the Forest Conservation Initiative (FCI) SEIR, and include updated baseline conditions, as discussed further below. The SEIR will also be programmatic in nature in that it will analyze the reasonably foreseeable impacts of the changes to the plan. For example, changes to land use densities could result in an increase or decrease in impacts that were previously analyzed in the GPU EIR. It should be noted that the project itself does not propose any specific development project that would result in physical impacts on the environment. However, it is reasonably foreseeable that future individual projects that are implemented under the Alpine Community Plan Update (ACPU) could result in physical impacts on the environment.

The purpose of this Notice of Preparation (NOP) is to provide interested stakeholders with sufficient information describing the project and the potential environmental effects in order to make a meaningful response as to which environmental issue areas and alternatives to the project should be analyzed within the SEIR.

Comments on the NOP will be accepted for 30 days following issuance of this notice and must be received no later than **October 1, 2018 at 4:00 p.m.** Comments on the notice of preparation document can be emailed or sent via mail to Greg Kazmer, Environmental Coordinator.

E-mail: gregory.kazmer@sdcounty.ca.gov

Address: Planning & Development Services
Attn: Greg Kazmer
5510 Overland Avenue, Suite 310
San Diego, CA 92123

Public Scoping Meeting

Consistent with Section 21083.9 of the CEQA Statute, a public scoping meeting will be held to solicit comments regarding the scope and analysis of the supplement to the 2011 General Plan Update Program EIR. This meeting will be held on **September 18, 2018 at 6:00 p.m.** at:

Alpine Library
1752 Alpine Boulevard
Alpine, CA 91901

Purpose of NOP and Scoping Meeting

The purpose of this NOP and scoping meeting is to provide responsible agencies and the public with information about the CEQA process and to provide further opportunities to identify environmental issues and alternatives for consideration in the SEIR. Public comments received during the NOP scoping process will be included as part of the SEIR.

Project Background

The California Environmental Quality Act (CEQA) Guidelines, Sections 15162 through 15164, set forth the criteria for determining the appropriate additional environmental documentation, if any, to be completed when there is a previously certified EIR covering the project for which a subsequent discretionary action is required. The SEIR for the proposed project will tier from both the GPU PEIR and the FCI SEIR.

General Plan Update

A Program EIR for the County's General Plan Update (GPU), Environmental Review Number 02-ZA-001, State Clearinghouse Number 2002111067, was certified by the Board of Supervisors on August 3, 2011. The certified PEIR evaluated potentially significant effects associated with the following environmental areas of potential concern: 1) aesthetics, 2) agricultural resources, 3) air quality, 4) biological resources, 5) cultural and paleontological resources, 6) geology and soils, 7) hazards and hazardous materials, 8) hydrology and water quality, 9) land use and planning, 10) mineral resources, 11) noise, 12) population and housing, 13) public services, 14) recreation, 15) transportation and traffic, 16) utilities and service systems, and 17) climate change.

Of these seventeen environmental subject areas, it was determined that only geology and soils and population and housing would not involve potentially significant impacts. The remaining environmental issues evaluated included impacts that would be significant and unavoidable, with the exception of impacts associated with the following four subject areas, which would be mitigated to a level below significant: cultural and paleontological resources, land use and planning, recreation, and climate change. The final certified GPU PEIR is available online at the County's website at <http://www.sdcountry.ca.gov/pds/gpupdate/environmental.html>.

Forest Conservation Initiative

On December 14, 2016, the Board of Supervisors approved the FCI project. The FCI lands entail approximately 72,000 acres within 13 communities within the unincorporated County. Of those, 1,354 parcels containing 13,747 acres are located within the Alpine community. The FCI was a voter-approved initiative which required that private lands within the Cleveland National Forest in San Diego County have a minimum lot size of 40 acres. The FCI was originally approved in 1993 and expired on December 31, 2010.

The land use map changes adopted as part of the GPU did not include FCI lands. When the FCI expired, the areas affected by the FCI reverted to the land use designations in effect before the FCI was enacted. As a result of the Board's approval of the FCI project in 2016, the GPU land use designations, Guiding Principles, and Policies were applied to the former FCI lands.

The FCI SEIR identified significant and unavoidable impacts to: 1) aesthetics, 2) agricultural and forestry resources, 3) air quality, 4) biological resources, 5) hazards and hazardous materials, 6) hydrology and water quality, 7) mineral resources, 8) noise, 9) public services, 10) transportation and traffic, and 11) utilities and service systems. It also identified significant and unavoidable impacts to global climate change.

The final certified FCI SEIR is available online at the County's website at <https://www.sandiegocounty.gov/content/sdc/pds/advance/FCI/fcifinalseir.html>

Community Plans

All community plans supplement the County General Plan. Community plans contain information and policies concerning land use, housing, circulation, conservation/open space, public facilities and services, recreation, and community character. However, other issues can be addressed, depending on community circumstances. The policies and programs contained in a community plan, which must be consistent with the County General Plan, are intended to provide long-term guidance and stability with respect to implementing County General Plan policies and programs.

The Alpine Community Plan was adopted on December 31, 1979; it was last amended in December 2016. The proposed project is a comprehensive update to the Alpine Community Plan. Because all community plans are components of the County General Plan, this action requires a General Plan Amendment (GPA).

Project Description

The proposed project would update and refine the current plan's goals and policies to reflect the character of Alpine and guide growth and development. The ACPU includes an infrastructure study and market analysis, which are intended to provide additional information to guide decision-making. It will also provide an opportunity to consolidate regulations, such as zoning and design guidelines. The ACPU will provide strategies and specific implementing actions to ensure that the land use vision will be accomplished. The implementation plan organizes and prioritizes actions, which are intended to parallel existing County efforts.

The ACPU may set forth changes in land use designations based on a constraints analysis and community input. In large part, existing zoning will be applied to land uses, although new designations that better support the goal of mixed-use development as well as transit-oriented development may also be developed. The project will further refine the land use patterns established as a part of the 2011 GPU and 2016 FCI projects. The structure of the ACPU will mirror the County General Plan where possible, including the land use, mobility, conservation/open space, housing, safety, and noise elements, although some elements may be omitted from the community plan where unique goals/policies/analyses are not applicable.

A special development feasibility study is being prepared to analyze several Areas of Consideration (as defined in the FCI SEIR) for future development. The feasibility study will include an assessment of infrastructure needs associated with roads, water, sewers, electricity, and fire protection and be used to determine appropriate land use densities and zoning designations. The feasibility study will consider Areas of Consideration AL-3, -4, -5, -6, -7, and -11B. More information on the project and community outreach efforts is available on the project web page at <https://www.sandiegocounty.gov/pds/CommunityGroups/AlpineCommunityPlanUpdate.html>.

As previously described, the project will require an SEIR that will tier from the GPU PEIR and FCI SEIR. This SEIR will use information from both of these EIRs and provide more specific analysis and details for the Alpine Community Plan Area (CPA). The components of the ACPU are still being developed. However, development of the ACPU will be guided by and must remain consistent with the goals, policies, and planning concepts identified in the County General Plan and other relevant County plans and programs.

CEQA Guidelines Section 15183 allows a streamlined environmental review process for projects that are consistent with the densities established by existing zoning, community plan or general plan policies for which an EIR was certified. The ACPU would update and refine the use of streamlining under CEQA Guidelines 15183 specific to the Alpine CPA.

CEQA Requirements

CEQA requires that public agencies consider the potentially significant adverse environmental effects of projects over which they have discretionary approval authority before taking action on those projects (Public Resources Code Section 21000 et. seq.). According to California Code of Regulations Section 15064(f)(1), preparation of an EIR is required whenever a project may result in a significant adverse environmental effect. An EIR is an informational document that is used to inform public agency decision-makers and the general public about the significant environmental effects of a project, identify possible ways to mitigate or avoid the significant effects, and describe a range of reasonable alternatives to the project that could feasibly attain most of the basic objectives of the project while substantially lessening or avoiding any of the significant environmental impacts. Public agencies are required to consider the information presented in the EIR when determining whether to approve a project.

CEQA Guidelines Section 15163 states that a lead agency may choose to prepare a supplement to the EIR rather than a subsequent EIR if the changes proposed meet the conditions described in Section 15162 and only minor additions and changes are necessary to make the previous EIR adequate. The Alpine Community Plan would be updated to incorporate goals and policies from the General Plan Update and reflect the character of Alpine. It would refine the current plan's goals and policies to guide growth and development within the Alpine community. As such, the County is proceeding with preparation of a supplement to the GPU PEIR and FCI SEIR.

Project Location

Alpine is an unincorporated community in the eastern portion of San Diego County, approximately 25 miles east of downtown San Diego (Figure 1). The Alpine CPA covers approximately 68,100 acres of land that is characterized by diverse geography, residential land use patterns, and an established town center area. The most distinguished geographic features are the rugged peaks of the Viejas and El Cajon Mountains near El Capitan Reservoir in the northern portion of the community as well as the hills and valleys around Loveland Reservoir in the southern portion. The Alpine CPA is bisected by Interstate 8, with the majority of the population concentrated in and around the Alpine town center, which is adjacent to the freeway. Cleveland National Forest comprises most of the land in the eastern and northern portions of the CPA.

The Alpine CPA is bordered by the Central Mountain Community Plan area to the north and east, the Jamul-Dulzura Community Plan area to the south, and the Lakeside and Crest-Dehesa-Harbison Canyon-Granite Hills Community Plan areas to the west (Figure 2). The Alpine CPA includes the suburban Glen Oaks neighborhood in the western portion and the Viejas Mountains, El Cajon Mountains, and Cleveland National Forest in the east. The elevation of the terrain ranges from approximately 1,500 feet at the vegetated drainages to more than 4,100 feet in the semi-arid hilly terrain of the Viejas and El Cajon Mountains.

The town of Alpine, which is in the north-central portion of the CPA, is the most densely populated community within the planning area. Local development on both sides of Interstate 8 consists primarily of residential/rural-residential, commercial, industrial, and mixed uses. The planning area also includes the communities of Peutz Valley, Japatul Valley, Hidden Glen, Dunbar Lane, and Galloway Valley. Development within these communities consists of rural-residential and light agricultural uses. The Viejas Indian Reservation and Capitan Grande Reservation are also within the boundaries of the Alpine CPA; however, they are not within the County's jurisdiction.

Probable Environmental Effects

The following is a list of the subject areas to be analyzed in the ACPU Supplemental EIR.

Aesthetics	Land Use and Planning
Agriculture and Forestry Resources	Mineral Resources
Air Quality	Noise
Biological Resources	Population and Housing
Cultural and Historical Resources	Public Services
Greenhouse Gas Emissions	Recreation
Energy Use	Tribal Cultural Resources
Hazards and Hazardous Materials	Transportation and Traffic
Hydrology and Water Quality	Utilities and Service Systems

As previously mentioned, comments on the NOP will be accepted for 30 days following issuance of this notice and must be received no later than **October 1, 2018 at 4:00 p.m.** Comments on the notice of preparation document can be emailed or sent via mail to Greg Kazmer, Environmental Coordinator.

E-mail: gregory.kazmer@sdcounty.ca.gov

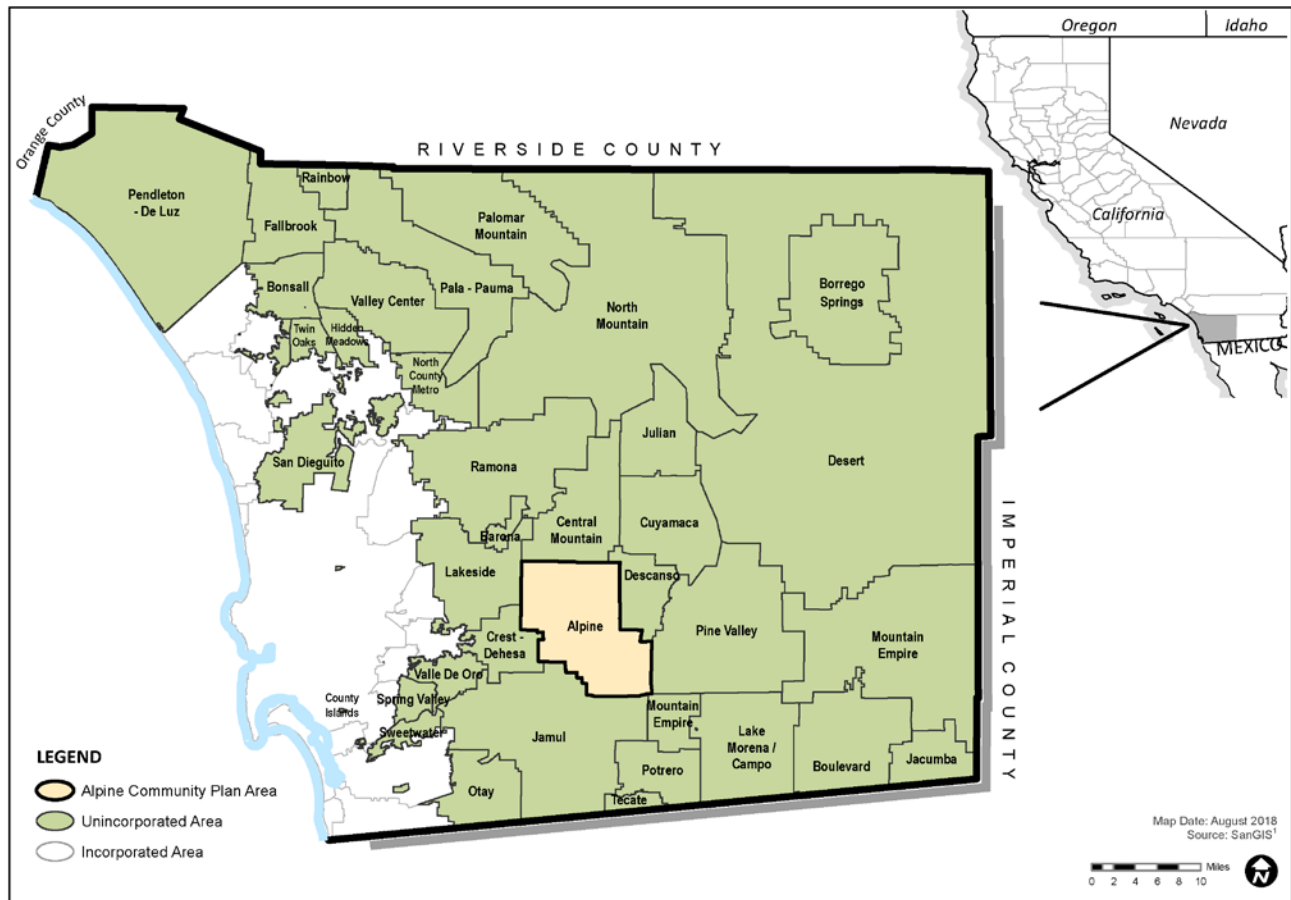
Address: Planning & Development Services
Attn: Greg Kazmer
5510 Overland Avenue, Suite 310
San Diego, CA 92123

Attachments:

Figure 1: Regional Map

Figure 2: San Diego County

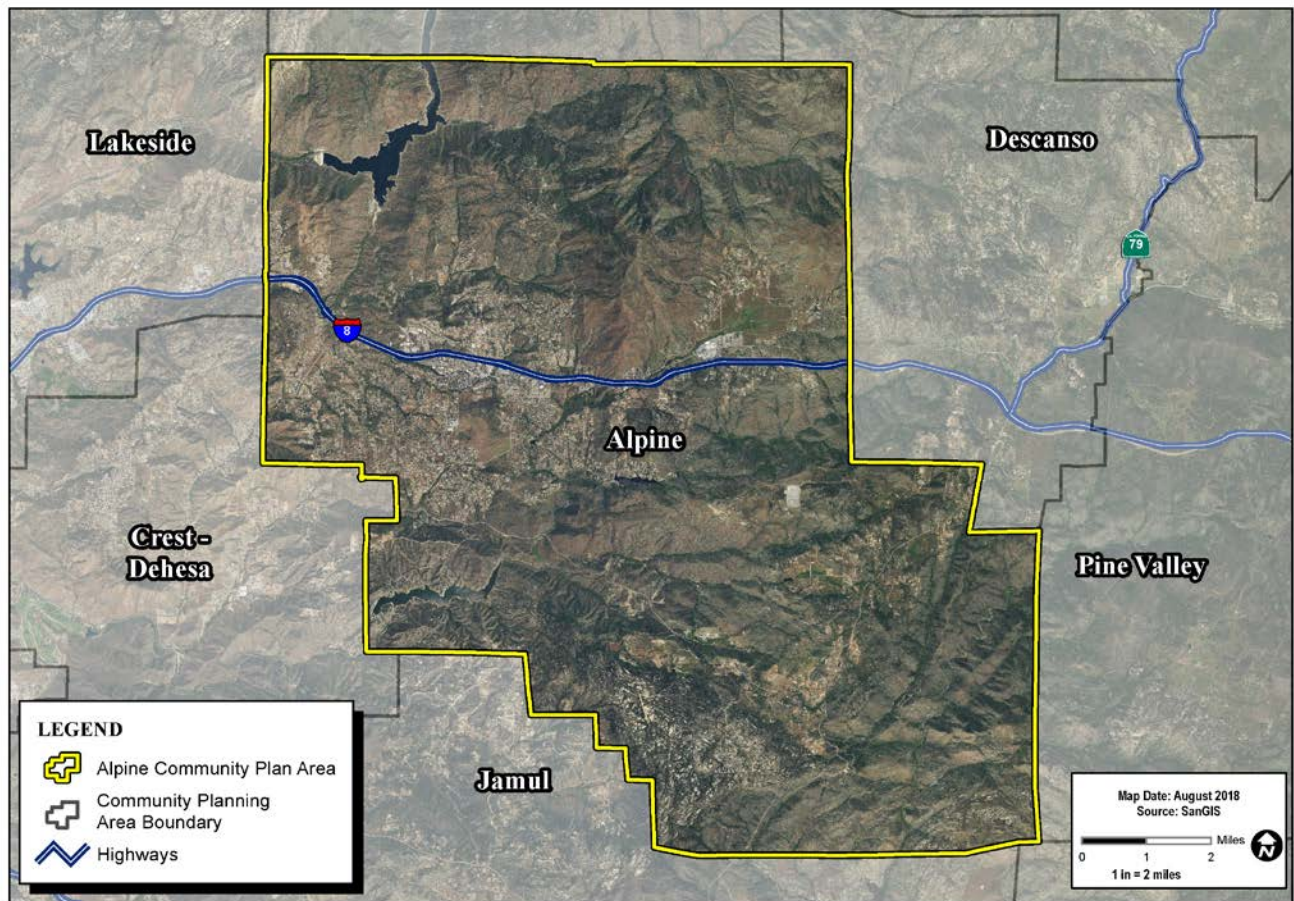
Figure 1: Regional Map



REGIONAL LOCATION MAP

FIGURE 1

Figure 2: San Diego County



ALPINE AERIAL MAP

FIGURE 2

From: [Diane Asaro-Smith](#)
To: [Kazmer, Gregory](#)
Subject: FW: Alpine Community Plan Update "PROJECT"
Date: Friday, August 31, 2018 9:08:07 AM
Attachments: [Alpine Comm Plan Update.pdf](#)

Hello Mr. Kazmer,

I received the attached letter in the mail and I just wanted to know what the project is actually all about.

Is there going to be a shopping mall or other large project constructed? The notice does not say what the

Project actually is.

I live right next to Alpine (unincorporated area of El Cajon....Dunbar Lane) so I was just wondering what

this was all about..that's all.

No need for tons of details, just a simple, quick reply is all I am looking for.

Thank you for your time,

Regards, Diane

Diane Asaro-Smith

Loan Specialist
California Bank & Trust
3737 Fifth Avenue
San Diego, CA 92103
619-299-9700
Fax 855-751-3260
Email: Diane.Asaro-Smith@calbt.com

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From: [Michael Azarmi](#)
To: [Kazmer, Gregory](#)
Subject: PDS2016-GPA-16-011 ODD-ER-18-00-002
Date: Friday, September 21, 2018 3:06:34 PM

Mr. Kazmer,

My name is Michael Azarmi and I'm processing the Planning Review for the Arnold Way project. The owner has cc'd me on a "Notice of Preparation Documentation".... I was inquiring on the Sept. 18th Public Scooping meeting. Was there something we needed to provide or attend this meeting? Please advise if we missed something. If not was was the outcome of the meeting and what was on the agenda?

Regards,

Michael Azarmi
Permits By Mike
619-417-1400

To

Greg Zazmer Environment Coordinator
County of San Diego
Planning & Development Services
5510 Overland Ave. Suite 310
San Diego Ca 92123

From

Tonie & John Bauer
450 Peutz Valley Rd
Alpine Ca 91901
619-445-7788



County of San Diego

MARK WARDLAW
DIRECTOR

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KATHLEEN A. FLANNERY
ASSISTANT DIRECTOR

ALPINE COMMUNITY PLAN UPDATE SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT

SEPTEMBER 18, 2018 SEIR PUBLIC SCOPING MEETING - COMMENT SHEET

Parcel # 402-220-59-00 10 1/2 AC
South boundry Interstate 8 East Pentz
Valley Rd
Please consider this to be a more
dense zoning due to the proximity
to alpena center.

Submit by Mail, Fax or Email. Comments must be received no later than October 1, 2018 at 4:00 p.m.

Greg Kazmer, Environmental Coordinator
County of San Diego
Planning and Development Services
5510 Overland Ave., Suite 310
San Diego, CA 92123

Email: gregory.kazmer@sdcounty.ca.gov

FAX: (858) 694-2555

Phone: (858) 505-6857

Toni V Bauer 10/18
Commenter Signature, Date

Toni V BAUER
Print Name

450 Pentz Valley Rd
Address

Alpine CA 91901
City, State, Zip Code

619-445-7788

DEPARTMENT OF TRANSPORTATION

DISTRICT 11

4050 TAYLOR STREET, MS-240

SAN DIEGO, CA 92110

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www.dot.ca.gov

*Making Conservation
a California Way of Life.*

September 11, 2018

11-SD-8

PM 29.19

Alpine Community Plan Update
NOP/SCH #2018081093

Mr. Greg Kazmer, Planning Manager
San Diego County Planning and Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

Dear Mr. Kazmer:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Notice of Preparation (NOP) of the Supplemental Environmental Impact Report (SEIR), State Clearinghouse (SCH) #2018081093 for the Alpine Community Plan Update located near Interstate 8 (I-8). The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. The Local Development-Intergovernmental Review (LD-IGR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities.

Caltrans has the following comments:

Traffic Impact Study

A traffic impact study (TIS) is necessary to determine this proposed project's near-term and long-term impacts to the State facilities – existing and proposed – and to propose appropriate mitigation measures.

- Please include ramp intersections of Harbison Canyon/Dunbar Lane, Tavern Road and Willows Road/Alpine Blvd. at I-8. The geographic area examined in the TIS should also include, at a minimum, all regionally significant arterial system segments and intersections, including State highway facilities where the project will add over 100 peak hour trips. State highway facilities that are experiencing noticeable delays should be analyzed in the scope of the traffic study for projects that add 50 to 100 peak hour trips.
- A focused analysis may be required for project trips assigned to a State highway facility that is experiencing significant delay, such as where traffic queues exceed ramp storage capacity.

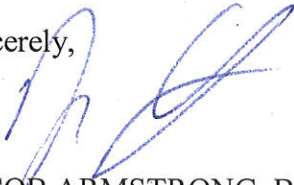
Mr. Greg Kazmer
September 11, 2018
Page 2

Complete Streets and Mobility Network

Caltrans views all transportation improvements as opportunities to improve safety, access and mobility for all travelers in California and recognizes bicycle, pedestrian and transit modes as integral elements of the transportation system. Caltrans supports improved transit accommodation through the provision of Park and Ride facilities, improved bicycle and pedestrian access and safety improvements, signal prioritization for transit, bus on shoulders, ramp improvements, or other enhancements that promotes a complete and integrated transportation system. Early coordination with Caltrans, in locations that may affect both Caltrans and the County of San Diego, is encouraged.

If you have any questions, please contact Mark McCumsey at (619) 688-6802 or by email at mark.mccumsey@dot.ca.gov

Sincerely,



JACOB ARMSTRONG, Branch Chief
Local Development and Intergovernmental Review Branch



County of San Diego

MARK WARDLAW
DIRECTOR

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KATHLEEN A. FLANNERY
ASSISTANT DIRECTOR

ALPINE COMMUNITY PLAN UPDATE SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT

SEPTEMBER 18, 2018 SEIR PUBLIC SCOPING MEETING - COMMENT SHEET

Just hope to keep Alpine as a small
community with some growth but under
control. Would envision improvement
on some roads and maybe add a
dog park or equestrian park to maintain
the majority of residents lifestyle

Submit by Mail, Fax or Email. Comments must be received no later than October 1, 2018 at 4:00 p.m.

Greg Kazmer, Environmental Coordinator
County of San Diego
Planning and Development Services
5510 Overland Ave., Suite 310
San Diego, CA 92123

Email: gregory.kazmer@sdcounty.ca.gov

FAX: (858) 694-2555

Phone: (858) 505-6857

Ann Casas 09/18/18
Commenter Signature, Date

Ann Casas

Print Name

2542 Engelmann Oak Lane
Address

Alpine, CA 91901

City, State, Zip Code



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
South Coast Region
3883 Ruffin Road
San Diego, CA 92123
(858) 467-4201
www.wildlife.ca.gov

EDMUND G. BROWN JR., Governor
CHARLTON H. BONHAM, Director



September 28, 2018

Greg Kazmer
Environmental Coordinator
Planning & Development Services
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5510 Overland Avenue, Suite 310
San Diego, CA 92123
(858) 505-6857
gregory.kazmer@sdcounty.ca.gov

**Subject: Comments on the Notice of Preparation of a Supplemental
Environmental Impact Report for the Alpine Community Plan Update
Project SCH# 2018081093**

Dear Mr. Kazmer:

The California Department of Fish and Wildlife (CDFW) has reviewed the above-referenced Notice of Preparation (NOP) for the Alpine Community Plan Update Project Supplemental Environmental Impact Report (SEIR).

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW ROLE

CDFW is California's Trustee Agency for fish and wildlife resources, and holds those resources in trust by statute for all the people of the State. (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; California Environmental Quality Act [CEQA] Guidelines § 15386, subd. (a).) CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (*Id.*, § 1802.) Similarly for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW is also a Responsible Agency under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381.) CDFW may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be

subject to CDFW's lake and streambed alteration regulatory authority. (Fish & G. Code, § 1600 et seq.) Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), related authorization as provided by the Fish and Game Code will be required.

CDFW also administers the Natural Community Conservation Planning (NCCP) program. San Diego County (County) participates in the NCCP program through implementation of its Subarea Plan (SAP) and development of its draft East County Subarea Plan (EC-MSCP).

Project Location:

Alpine is an unincorporated community in the eastern portion of the County, approximately 25 miles east of downtown San Diego. The Alpine Community Plan Area (CPA) covers approximately 68,100 acres of land that is characterized by diverse geography, residential land use patterns, and an established town center area. The Alpine CPA is bisected by Interstate 8, with the majority of the population concentrated in and around the Alpine town center, which is adjacent to the freeway. Cleveland National Forest comprises most of the land in the eastern and northern portions of the CPA. The town of Alpine, which is in the north-central portion of the CPA, is the most densely populated community within the planning area. Local development on both sides of Interstate 8 consists primarily of residential/rural-residential, commercial, industrial, and mixed uses. The planning area also includes the communities of Peutz Valley, Japatul Valley, Hidden Glen, Dunbar Lane, and Galloway Valley. The Viejas Indian Reservation and Capitan Grande Reservation are also within the boundaries of the Alpine CPA, but are not within the County's jurisdiction.

Project Description/Objective:

The proposed project would update and refine the current plan's goals and policies to reflect the character of Alpine and guide growth and development, as well as provide an opportunity to consolidate regulations, such as zoning and design guidelines. The project may set forth changes in land use designations based on a constraints analysis and community input. New designations that better support the goal of mixed-use development as well as transit-oriented development may also be developed. The project would further refine the land use patterns established as a part of the 2011 General Plan Update. Development of the project must remain consistent with the goals, policies, and planning concepts identified in the County General Plan and other relevant County plans and programs. CEQA Guidelines Section 15183 allows a streamlined environmental review process for projects that are consistent with the densities established by existing zoning, community plan or general plan policies for which an EIR was certified. The project would update and refine the use of streamlining under CEQA Guidelines 15183 specific to the Alpine CPA.

COMMENTS AND RECOMMENDATIONS

CDFW offers the following comments and recommendations to assist the County in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources.

Specific Comments

The Alpine CPA includes many areas mapped as Focused Conservation Areas (FCA) in the most recent analysis for preserve planning under the draft EC-MSCP, as well as Pre-approved Mitigation Areas (PAMA) under the SAP. CDFW recommends that the SEIR include a thorough analysis of how any change in land use designations could affect successful build-out of the preserve under both plans.

General Comments

1. CDFW has responsibility for wetland and riparian habitats. It is the policy of CDFW to strongly discourage development in wetlands or conversion of wetlands to uplands. We oppose any development or conversion that would result in a reduction of wetland acreage or wetland habitat values, unless, at a minimum, project mitigation assures there will be "no net loss" of either wetland habitat values or acreage. Development and conversion include but are not limited to conversion to subsurface drains, placement of fill or building of structures within the wetland, and channelization or removal of materials from the streambed. All wetlands and watercourses, whether ephemeral, intermittent, or perennial, should be retained and provided with substantial setbacks that preserve the riparian and aquatic values and maintain their value to on-site and off-site wildlife populations. Mitigation measures to compensate for impacts to mature riparian corridors must be included in the SEIR and must compensate for the loss of function and value of a wildlife corridor.
 - a) The project area supports aquatic, riparian, and wetland habitats; therefore, a jurisdictional delineation of the creeks and their associated riparian habitats should be included in the SEIR. The delineation should be conducted pursuant to the U. S. Fish and Wildlife Service wetland definition adopted by CDFW.¹ Please note that some wetland and riparian habitats subject to CDFW's authority may extend beyond the jurisdictional limits of the U.S. Army Corps of Engineers.

¹ Cowardin, Lewis M., et al. 1979. Classification of Wetlands and Deepwater Habitats of the United States. U.S. Department of the Interior, Fish and Wildlife Service.

- b) The CDFW also has regulatory authority over activities in streams and/or lakes that will divert or obstruct the natural flow, or change the bed, channel, or bank (which may include associated riparian resources) of any river, stream, or lake or use material from a river, stream, or lake. For any such activities, the project applicant (or "entity") must provide written notification to CDFW pursuant to section 1600 *et seq.* of the Fish and Game Code. Based on this notification and other information, CDFW determines whether a Lake and Streambed Alteration Agreement (LSAA) with the applicant is required prior to conducting the proposed activities. CDFW's issuance of a LSAA for a project that is subject to CEQA will require CEQA compliance actions by CDFW as a Responsible Agency. CDFW as a Responsible Agency under CEQA may consider the local jurisdiction's (lead agency) Negative Declaration or Environmental Impact Report for the project. To minimize additional requirements by CDFW pursuant to section 1600 *et seq.* and/or under CEQA, the document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring and reporting commitments for issuance of the LSAA.²
2. CDFW considers adverse impacts to a species protected by the California Endangered Species Act (CESA), for the purposes of CEQA, to be significant without mitigation. As to CESA, take of any endangered, threatened, or candidate species that results from the project is prohibited, except as authorized by state law (Fish & G. Code, §§ 2080, 2085). Consequently, if the Project, Project construction, or any Project-related activity during the life of the Project will result in take of a species designated as endangered or threatened, or a candidate for listing under CESA, CDFW recommends that the project proponent seek appropriate take authorization under CESA prior to implementing the project. Appropriate authorization from CDFW may include an incidental take permit (ITP) or a consistency determination in certain circumstances, among other options (Fish and G. Code §§ 2080.1, 2081, subds. (b), (c)). Early consultation is encouraged, as significant modification to a project and mitigation measures may be required in order to obtain a CESA Permit. Revisions to the Fish and Game Code, effective January 1998, may require that CDFW issue a separate CEQA document for the issuance of an ITP unless the project CEQA document addresses all project impacts to CESA-listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of an ITP. For these reasons, biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for a CESA ITP.

² A notification package for a LSA may be obtained by accessing the Department's web site at <http://www.wildlife.ca.gov/Conservation/LSA>.

3. To enable CDFW to adequately review and comment on the proposed project from the standpoint of the protection of plants, fish, and wildlife, we recommend the following information be included in the SEIR.
 - a) The document should contain a complete discussion of the purpose and need for, and description of, the proposed project, including all staging areas and access routes to the construction and staging areas.
 - b) A range of feasible alternatives should be included to ensure that alternatives to the proposed project are fully considered and evaluated; the alternatives should avoid or otherwise minimize impacts to sensitive biological resources, particularly wetlands. Specific alternative locations should be evaluated in areas with lower resource sensitivity where appropriate.

Biological Resources within the Project's Area of Potential Effect

4. The document should provide a complete assessment of the flora and fauna within and adjacent to the project area, with particular emphasis upon identifying endangered, threatened, sensitive, and locally unique species and sensitive habitats. This should include a complete floral and faunal species compendium of the entire project site, undertaken at the appropriate time of year. The SEIR should include the following information.
 - a) CEQA Guidelines, section 15125(c), specifies that knowledge on the regional setting is critical to an assessment of environmental impacts and that special emphasis should be placed on resources that are rare or unique to the region.
 - b) A thorough, recent floristic-based assessment of special status plants and natural communities, following CDFW's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities (see <https://www.wildlife.ca.gov/Conservation/Plants/Info>). CDFW recommends that floristic, alliance-based and/or association-based mapping and vegetation impact assessments be conducted at the Project site and neighboring vicinity. The Manual of California Vegetation, second edition, should also be used to inform this mapping and assessment (Sawyer et al. 2008³). Adjoining habitat areas should be included in this assessment where site activities could lead to direct or indirect impacts off-site. Habitat mapping at the alliance level will help establish baseline vegetation conditions.

3 Sawyer, J. O., T. Keeler-Wolf and J.M. Evens. 2009. A Manual of California Vegetation, Second Edition. California Native Plant Society Press, Sacramento.

- c) A current inventory of the biological resources associated with each habitat type on site and within the area of potential effect. CDFW's California Natural Diversity Data Base in Sacramento should be contacted at www.wildlife.ca.gov/biogeodata/ to obtain current information on any previously reported sensitive species and habitat, including Significant Natural Areas identified under Chapter 12 of the Fish and Game Code.
- d) An inventory of rare, threatened, endangered and other sensitive species on site and within the area of potential effect. Species to be addressed should include all those which meet the CEQA definition (see CEQA Guidelines, § 15380). This should include sensitive fish, wildlife, reptile, and amphibian species. Seasonal variations in use of the project area should also be addressed. Focused species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures should be developed in consultation with CDFW and the U.S. Fish and Wildlife Service.

Analyses of the Potential Project-Related Impacts on the Biological Resources

- 5. To provide a thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources, with specific measures to offset such impacts, the following should be addressed in the SEIR.
 - a) A discussion of potential adverse impacts from lighting, noise, human activity, exotic species, and drainage should also be included. The latter subject should address: project-related changes on drainage patterns on and downstream of the project site; the volume, velocity, and frequency of existing and post-project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and post-project fate of runoff from the project site. The discussions should also address the proximity of the extraction activities to the water table, whether dewatering would be necessary, and the potential resulting impacts on the habitat, if any, supported by the groundwater. Mitigation measures proposed to alleviate such impacts should be included.
 - b) Discussions regarding indirect project impacts on biological resources, including resources in nearby public lands, open space, adjacent natural habitats, riparian ecosystems, and any designated and/or proposed or existing reserve lands (e.g., preserve lands associated with a NCCP). Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in adjacent areas, should be fully evaluated in the SEIR.
 - c) The zoning of areas for development projects or other uses that are nearby or adjacent to natural areas may inadvertently contribute to wildlife-human interactions. A discussion of possible conflicts and mitigation measures to reduce these conflicts should be included in the environmental document.

- d) A cumulative effects analysis should be developed as described under CEQA Guidelines, section 15130. General and specific plans, as well as past, present, and anticipated future projects, should be analyzed relative to their impacts on similar plant communities and wildlife habitats.

Mitigation for the Project-related Biological Impacts

- 6. The SEIR should include measures to fully avoid and otherwise protect Rare Natural Communities from project-related impacts. CDFW considers these communities as threatened habitats having both regional and local significance.
- 7. The SEIR should include mitigation measures for adverse project-related impacts to sensitive plants, animals, and habitats. Mitigation measures should emphasize avoidance and reduction of project impacts. For unavoidable impacts, on-site habitat restoration or enhancement should be discussed in detail. If on-site mitigation is not feasible or would not be biologically viable and therefore not adequately mitigate the loss of biological functions and values, off-site mitigation through habitat creation and/or acquisition and preservation in perpetuity should be addressed.
- 8. For proposed preservation and/or restoration, the SEIR should include measures to perpetually protect the targeted habitat values from direct and indirect negative impacts. The objective should be to offset the project-induced qualitative and quantitative losses of wildlife habitat values. Issues that should be addressed include restrictions on access, proposed land dedications, monitoring and management programs, control of illegal dumping, water pollution, increased human intrusion, etc.
- 9. CDFW recommends that measures be taken to avoid project impacts to nesting birds. Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (Title 50, § 10.13, Code of Federal Regulations. Sections 3503.5 and 3513 of the California Fish and Game Code prohibit take of all raptors and other migratory nongame birds and section 3503 prohibits take of the nests and eggs of all birds. Proposed project activities (including, but not limited to, staging and disturbances to native and nonnative vegetation, structures, and substrates) should occur outside of the avian breeding season which generally runs from February 1- September 1 (as early as January 1 for some raptors) to avoid take of birds or their eggs. If avoidance of the avian breeding season is not feasible, CDFW recommends surveys by a qualified biologist with experience in conducting breeding bird surveys to detect protected native birds occurring in suitable nesting habitat that is to be disturbed and (as access to adjacent areas allows) any other such habitat within 300 feet of the disturbance area (within 500 feet for raptors). Project personnel, including all contractors working on site, should be instructed on the sensitivity of the area. Reductions in the nest buffer

distance may be appropriate depending on the avian species involved, ambient levels of human activity, screening vegetation, or possibly other factors.

10. CDFW generally does not support the use of relocation, salvage, and/or transplantation as mitigation for impacts to rare, threatened, or endangered species. Studies have shown that these efforts are experimental in nature and largely unsuccessful.
11. Plans for restoration and revegetation should be prepared by persons with expertise in southern California ecosystems and native plant revegetation techniques. Each plan should include, at a minimum: (a) the location of the mitigation site; (b) the plant species to be used, container sizes, and seeding rates; (c) a schematic depicting the mitigation area; (d) planting schedule; (e) a description of the irrigation methodology; (f) measures to control exotic vegetation on site; (g) specific success criteria; (h) a detailed monitoring program; (i) contingency measures should the success criteria not be met; and (j) identification of the party responsible for meeting the success criteria and providing for conservation of the mitigation site in perpetuity.

CONCLUSION

CDFW appreciates the opportunity to comment on the NOP to assist the County in identifying and mitigating Project impacts on biological resources. Questions regarding this letter or further coordination should be directed to Eric Hollenbeck, Senior Environmental Scientist (Specialist) at (858) 467-2720 or Eric.Hollenbeck@wildlife.ca.gov.

Sincerely,



Gail K. Sevens
Environmental Program Manager

ec: Office of Planning and Research, State Clearinghouse, Sacramento
Karen Goebel, USFWS

From: [The Scotty](#)
To: [Kazmer, Gregory](#)
Subject: Noise Problems for the Alpine Community Plan Update
Date: Monday, September 24, 2018 7:06:48 AM

Dear Greg,
09/24/2018

I would like to address noise problems in the Alpine Community Plan. Would you please direct me to whoever would be in charge of this area of concern within the Notice of Preparation, Alpine Community Plan Update, Supplemental Environmental Impact Report.

Thank you for your cooperation,

Scott Cioffi
909 Midway Drive
Alpine, CA 91901
cryanc2002@yahoo.com



File Code: 1560
Date: September 27, 2018

Greg Kazmer
San Diego County Planning and Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

Dear Mr. Kazmer:

The Cleveland National Forest (Forest) appreciates the opportunity to provide scoping comments on the proposed Alpine Community Plan Update (ACPU). Our Descanso Ranger District Office is located in Alpine, and National Forest System lands surround the community on three sides, so we consider ourselves part of the Alpine community. The recent West Fire brought this close to home, as it caused major damage and property loss and threatened our office despite being a relatively small fire. It made the concerns we raised about future development in Alpine during the Forest Conservation Initiative General Plan Amendment planning process readily apparent. We greatly appreciate the Board of Supervisors direction on June 25, 2014, to involve the Forest Service in a special study to determine the feasibility of developing the needed infrastructure such as water access, sewer and fire protection, to support a given density and determine how to protect National Forest System lands from development impacts. Please let us know the status of the special study and how we can remain involved in its preparation.

Forest staff have attended the scoping meeting (September 18, 2018) and reviewed available information on the San Diego County ACPU webpage, including the Initial Study. We attempted to locate documents and results of the studies referenced in the Initial Study to understand ACPU project details (e.g., the proposed revisions) and Initial Study rationales and conclusions. Other than the potential for increased development around and adjacent to the Forest,¹ we do not have an understanding of what is specifically being proposed and analyzed. Given this, our comments and recommendations are somewhat generalized. We will provide more specific comments at the Draft Supplemental Environmental Impact Report (SEIR) stage when this information is provided. Overall, we appreciate the County's intent to further evaluate and analyze potential issues of general concern to the Forest. Forest scoping comments are provided below.

First, we are re-submitting letters from the Forest to the County and Board of Supervisors on the General Plan Amendment for the former Forest Conservation Initiative Lands (FCI) (see Attachment 1 to 3). This past project involved issues and associated consequences to Forest land that we are similarly concerned with for the APCU. In summary, the APCU will set the stage for change in Alpine, including increased development and potential impacts to the Forest. This concern exists even though the APCU is only a plan that guides future development, applies only

¹ San Diego County Planning & Development Services, Alpine Community Plan Update: Development Feasibility Study Area, <https://www.sandiegocounty.gov/pds/CommunityGroups/AlpineCommunityPlanUpdate.html>.



to lands within County and community jurisdictions, and does not commit to actual development. Implementation of APCU direction would affect the Forest, since potential effects (e.g., wildlife habitat degradation and wildfires) do not stop at jurisdictional boundaries. The Forest would like to request that the County determine whether our issues and concerns can be avoided or minimized in advance by integrating them into project/alternative development. For example, land use designations could limit incompatible development by imposing buffers on parcels within or adjacent to Forest boundaries. More information on Forest land use is located in the Land Management Plan (LMP).² To the extent that this is not possible, the Forest requests that the County determine whether design guidelines could be used to avoid or minimize effects. For example, design guidelines could specify requirements applicable to future development so there is no expectation the Forest Service will aid future landowners with addressing issues that may arise from incompatible development (e.g., vegetation management, utilities, water supply, and roads). For instance, future development must tie into existing roads and infrastructure. In this way, we can work together to ensure the environmental sustainability of future growth in Alpine by avoiding incompatible development in areas within and adjacent to the Forest that would result in increased land management challenges. We would like to avoid the scenario where our issues and concerns are merely considered, analyzed, and dismissed in an EIR.

Second, please clarify how the FCI SEIR is relevant to the APCU, which will tier to and supplement the General Plan Program EIR (PEIR). The Notice of Preparation (NOP) indicates that the APCU will tier to and update both EIRs. It would seem that the FCI SEIR is no longer in need of supplementation since the FCI has expired. This would leave the General Plan PEIR as the relevant document to be supplemented. However, if both documents are supplemented or tiered, please resolve any discrepancies in the APCU Draft SEIR. For instance, the NOP shows that the issues analyzed and resulting conclusions may differ between the FCI and General Plan EIRs (*see* NOP at 2 to 3). Also, past comments on EIR adequacy (Attachments 1 to 3) could be reviewed to avoid the same issues in the APCU Draft SEIR.

Lastly, the Forest provides the comments and recommendations listed below to aid with preparation of the Draft SEIR.

- (1) Project description. Include details on what is the project so that the reader can understand the aspects of it that could have potential effects. For example, explaining that the project as something that will not result in development (just a plan), but then including statements about future development causes confusion. Clarity and consistency throughout the SEIR will aid with reader comprehension.
- (2) Incorporating by reference. Summarize the relevant information and provide a page number to the specific sections of the associated documents referenced so that the reader can more quickly understand the basis of rationales and conclusions. For example, before concluding that the General Plan policies and mitigation measures would be implemented to reduce potential effects, it is important to first explain the anticipated effects and how the specific policy or mitigation measure would reduce the effects.³ This would avoid conclusory statements and resolve data gaps that may be present in the higher level, programmatic analyses. Matters addressed at a program level often do not

² See LMP, as amended, at: <https://www.fs.usda.gov/main/cleveland/landmanagement/planning>.

³ See also, "Effects Analysis" comment below.

provide the details needed for a project-specific analysis. Also, generally incorporating by reference past EIRs without further explanation is not helpful to the reader.

(3) Issues and Potential Effects.

- a. Unavoidable Effects. We have a general concern about the content of the Initial Study and its discussion of what seems to be preventable issues characterized as unavoidable effects for a majority of the environmental factors (see Initial Study at 10, 11, 15, 17, 29, 35, 42, 49, 51, and 56). We understand that the APCU is supplementing the General Plan PEIR, but we request a more constrained use of the term unavoidable in the SEIR. We prefer project modification or development of design guidelines to resolve potential issues in advance. For issues that truly cannot be resolved, please include the explanation in the SEIR.
- b. Issues Omitted. Population and Housing is not checked, but it appears that it will be analyzed as an issue (see Initial Study at 6 and 46). We agree that it should be analyzed or that the information be provided in the project description since the project and alternatives developed are responding to future population and housing needs. Please include information on the projected population growth in the SEIR. As to Geology and Soils not being further analyzed, see Wildfire comment below.
- c. Wildfire. After considering whether potential wildfire issues can be resolved in advance, consider breaking out wildfire as a separate section or including a wildfire discussion under each of the relevant issues. As explained in the California Environmental Quality Act (CEQA) guidelines, public agencies are free to devise their own format for an initial study.⁴

Wildfire has the potential to affect resources or exacerbate current resource conditions. Air Quality, Geology and Soils, and Greenhouse Gas Emissions are a few relevant topics. If analyzed independently or through a narrow lens, the corresponding risk from the project may appear low or non-existent. This can be seen in the discussion of Geology and Soils (see Initial Study at 22-27). If effects from wildfires were considered, the Initial Study conclusions may be different. For example, after a wildfire burns the soil stabilizing vegetation, considerations other than the soil profile (e.g., slope and location of population centers) may be more relevant in analyzing potential effects from the project (e.g., loss of life and property from landslides or mudflow).

As mentioned above, we believe that some of the potential issues associated with the APCU can be avoided or minimized. In the example above, the potential loss of property and life can be minimized if the APCU integrates a setback or buffer between future developments and areas where risk of loss exists.

Overall, we are uncomfortable with the lack of attention given to wildfire and how the potential issues is treated as an issue to be analyzed in an SEIR rather than resolved as part of the project (see Initial Study at 33).

⁴ CEQA Guidelines, Section 15063(f).

- d. Land Use. As an adjacent land owner-manager, the Forest would prefer if our concerns are resolved in project design/alternative development phase, to the extent possible. The Forest's LMP explains the land uses within the Forest and adjacent to Alpine. Although the standard initial study checklist does not include any questions pertaining to consistency with other agency plans, the County is able to modify the checklist to account for the LMP. This is important because implementing the APCU could adversely affect the Forest.
- (4) Effects Analyses. Include explanations of potential effects and mitigation considered prior to making conclusions. This will help avoid conclusory statements (indication of an inadequate analysis) and/or the appearance of a deferred analysis.
- (5) CEQA Tiering and Streamlining. Information on the County's APCU webpage indicate concern about the potential inability to streamline under CEQA with the current Alpine Community Plan language. The NOP also indicates an intent for future projects to be streamlined under CEQA by using the future-certified APCU SEIR. During scoping, the community was concerned about whether future projects would undergo a similar environmental review or whether the APCU authorizes the projects. That projects will likely go through a streamlined (expedited) environmental review was not explained at the scoping meeting in response to public concerns about the effect of the APCU. For clarification, we recommend the SEIR include an explanation of future, project-specific environmental reviews and when it would be proper.

Since both the project description and analysis in the Initial Study is generalized, it does not seem possible that the future EIR would provide CEQA coverage for future projects if the EIR is written in the same manner. Our review of a past EIR (Attachment 1) noticed similar issues with the effects analysis (e.g., lack of description of actual impacts and no data to support rationales and conclusions). To ensure the ability of future projects to undergo a streamlined environmental review, we recommend resolving the comments discussed in this letter.

Thank you for continuing to involve the Forest on County projects and the attention you have given to our concerns in the past. We hope the comments provided above will assist the County in preparing a Draft SEIR that is acceptable for all the relevant stakeholders. If you have any questions about these comments, please contact Linda Serret, Forest Planner, at (858) 674-2959.

Sincerely,



William Metz
Forest Supervisor

Enclosures:

USFS comments on FCI Lands Draft SEIR
Letter to County Supervisors_FCI Lands
FCIlands_2nd comment period letter

Attachment 1
(USFS comments on FCI Lands Draft SEIR)



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.

- **Jamul CPA – Skye Valley Ranch.** The Forest would recommend continuing the RL-80 zoning on these parcels. The bridge over Pine Creek near Barrett Honor Camp is insufficient for any traffic, even in an emergency, and will not be improved or replaced since it falls within the Pine Creek Wilderness. Additionally, these parcels border two existing federally designated wilderness areas (Pine Creek Wilderness and Hauser Wilderness) and are completely surrounded by NFS lands. Further improvement of infrastructure to this area, such as utilities and road access, required for a smaller lot size zoning would have a negative impact on wilderness values, increase the need for fuels treatments, and raise potential for the issues and impacts described above.
- **Areas west of Cuyamaca CPA.** The Forest supports RL-80 zoning for parcels adjacent to the Cuyamaca CPA along Boulder Creek Road. These parcels are located in a very undeveloped and fire prone part of the Cleveland National Forest and are adjacent to Inventoried Roadless Areas (IRAs) that are proposed for recommended wilderness status in the Southern California National Forests Land Management Plan Amendment project.
- **Descanso CPA.** The Forest supports the mix of zoning as mapped for the Descanso planning area and encourages the County to retain the lower density RL-80 zoning that is currently proposed. The northern part of the Descanso CPA abuts two IRAs (Sill Hill and No Name) that are proposed for recommended wilderness status in the Southern California National Forests Land Management Plan Amendment project. Also adjacent to the north Descanso CPA is the King Creek Research Natural Area, which contains a rare population of Cuyamaca cypress, a Forest Service sensitive species. All of the King Creek stands burned in a fire in 1950 and most of the area re-burned in the 2003 Cedar Fire. Post-Cedar Fire regeneration is expected to be adequate to repopulate the stands because trees were old enough to have substantial cone banks at the time of the fire; however, it is important to protect the stand from overly frequent fire especially at this vulnerable time. For these reasons, the Forest supports a minimum of RL-40 adjacent to these IRAs and research natural area on the NFS land.
- **Pine Valley CPA.** The Forest supports the current extent of RL-80 zoning proposed for the Pine Valley CPA in the Draft Land Use Plan. This area contains many of the highest recreational and scenic values to be found on the Cleveland National Forest. Parcels in this CPA south of Interstate 8 are directly adjacent to the federally designated Pine Creek Wilderness. Parcels along Sunrise Highway are adjacent to the Mount Laguna National Recreation Area. The Forest also supports maintaining the proposed RL-40 zoning adjacent to Buckman Springs Road because the NFS land to the east is zoned as Back Country Non-Motorized, which is the most restrictive zoning other than recommended

wilderness and designated wilderness. In addition, the Pacific Crest Trail, a 2,650-mile national scenic trail that runs from Mexico to Canada through California, Oregon and Washington, traverses this area before moving onto the National Forest. The low density proposed would help maintain the recreational and scenic values.

- **Central Mountain CPA.** We recommend RL-80 zoning for parcels in the Central Mountain CPA where RL-40 zoning in the adjacent Julian CPA was extended into parcels within the Cleveland National Forest. This recommendation affects two contiguous parcels that are adjacent to the Upper San Diego River Canyon. The Upper San Diego River is an area of rugged topography and high fire danger. In addition, this undeveloped area is proposed for recommended wilderness status in the Southern California National Forests Land Management Plan Amendment project.
- **Pendleton – De Luz CPA.** The Forest recommends reducing the allowable density to RL-80 for RL-40 in areas surrounded by NFS lands in the Pendleton - De Luz CPA. These parcels are directly adjacent to the federally designated San Mateo Canyon Wilderness area. The parcels on Miller Mountain contain unique botanical resources and would require major road improvements across NFS lands if developed.
- **North Mountain CPAs.** The Forest supports the current extent of RL-80 zoning in the North Mountain CPA and encourages the county to retain this zoning through the planning process. We are uncertain of the proposed density for the triangular parcel on the north side of Warner Springs, which abuts the Caliente Inventoried Roadless Area proposed for wilderness designation in the Southern California National Forests Land Management Plan Amendment project. Reducing the density for this parcel to the RL-80 zoning would better buffer the proposed recommended wilderness area from adjacent land uses.

Comments on the Draft Supplemental Environmental Impact Report

The Draft SEIR should clearly make the case that the objectives presented in Chapter 1.3, as drawn from the County of San Diego General Plan, are met by the proposed project. In our view, the document fails to demonstrate that the proposed project meets the majority of the objectives and instead includes evidence that objectives will not be met. Other than stakeholder participation, the only objective that the proposed project could meet is the first one listed – “Support a reasonable share of projected regional population growth;” – and we feel that it fails to meet even this objective, because the failure to meet the remainder of the objectives renders the share of growth unreasonable. The proposed project clearly conflicts with 6 of the 10 objectives, as the rationale beneath each objective below demonstrates:

- Promote sustainability by locating new development near existing infrastructure, services, and jobs.

- Remote parcels within and adjacent to the Cleveland National Forest are far from infrastructure, services, and jobs.
- Promote environmental stewardship that protects the range of natural resources and habitats that uniquely define the County's character and ecological importance.
 - Increased development on remote parcels within and adjacent to the Cleveland National Forest threatens many of the 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.
 - Remote parcels within and adjacent to the Cleveland National Forest experience severe risk of wildland fire incursion.
- Provide and support a multi-modal transportation network that enhances connectivity and supports community development patterns.
 - Remote parcels within and adjacent to the Cleveland National Forest are accessible only by passenger vehicle and road access is substandard for general residential use.
- Maintain environmentally sustainable communities and reduce greenhouse gas emissions that contribute to climate change.
 - Remote parcels within and adjacent to the Cleveland National Forest would not be environmentally sustainable for numerous reasons cited throughout this letter, and the development and access would increase greenhouse gas emissions that contribute to climate change.
- Minimize public costs of infrastructure and services and correlate their timing with new development.
 - Remote parcels within and adjacent to the Cleveland National Forest would maximize public costs of infrastructure and services.

The assumption is made throughout the analysis of potential impacts that "regulations, implementation programs, and mitigation measures from the General Plan Update EIR" will result in impacts that fall below the threshold of significance. This assumption is flawed in that it fails to recognize the irretrievable losses to natural and cultural resources involved when subdividing new areas of an already densely populated region. The Draft SEIR presents numerous plans and projects considered in evaluating cumulative impacts, but it fails to include the impacts of the past development of San Diego County, as represented by the existing condition of the region. When viewed through this lens, further increases of population density in remote areas of the County will necessarily have significant impacts, regardless of "regulations, implementation programs, and mitigation measures." The scope of the cumulative impacts section needs to be broadened to include development that has occurred up to the current time.

While the Draft SEIR considers many topics, it fails to offer the level of detail that would be needed to evaluate the environmental impacts of its alternatives. We feel that as a result of the vague nature of the analysis presented, environmental and public health and safety impacts have

not been sufficiently analyzed or disclosed. Examples of these deficiencies are provided below by topic.

Biological Resources

With regard to description of the impacts of the FCI Lands project on biological resources, there is no description of the actual impacts, as no inventory, identification, or evaluation of such resources has been completed and the actual impacts are unknown. Instead, there is only a general discussion of potential project impacts on general plant and wildlife species. These are assumed to be significant and unavoidable for special status species, riparian habitat, and wildlife movement corridors (Table S-2). However, there is no identification of effects on individual species even though the project will adversely affect or is likely to adversely affect a number of federally-listed species including Arroyo Toad, California Gnatcatcher, and San Diego Thornmint as well as candidate species for listing such as Hermes Copper butterfly. The proposed alternatives will also adversely affect many of our Regional Forester's list of Sensitive Species through direct mortality and habitat loss and fragmentation, creating difficulties for conserving their populations on NFS lands. The blanket approach taken by the Draft SEIR does not adequately describe and disclose effects on these species, effectively leaving this analysis to later piecemeal analyses that will be done for individual projects. This does not allow for meaningful protection and conservation of these species across broader areas. This is not consistent with the purpose and intent of CEQA.

Given the lack of detail in the SEIR, it is not possible to perform a meaningful comparison of the effects of the different alternatives. The analysis does not provide enough information to determine which alternative would best conserve key resources.

Cultural and Paleontological Resources

Section 15123(b)(3) of the CEQA Guidelines requires that an EIR address the issues to be resolved, which includes the choices among alternatives and whether or how to mitigate significant impacts. As stated in the Draft FCI Lands SEIR, the major issues to be resolved regarding the project include decisions by the Lead Agency as to whether or not the Draft SEIR adequately describes the environmental impacts, whether the recommended mitigation measures identified for the proposed Project should be adopted or modified, or if additional mitigation measures should be required.

In regard to adequate description of the impacts of the FCI Lands project on historic or archaeological resources, there is no description of the actual impacts, as no inventory, identification, or evaluation of such resources has been completed and the actual impacts are unknown. Instead, there is only a general discussion of potential project impacts, which are assumed in advance to be less than significant through the implementation of various policies and mitigation measures contained in the General Plan Update.

Table S-2, "Summary of Project Impacts" and various sections of the Draft FCI Lands SEIR contain information indicating that implementation of the Proposed Project would result in new development that would have the potential to result in substantial adverse changes to the

significance of historical resources and cause a substantial adverse change in the significance of archaeological resources, including the destruction or disturbance of archaeological sites that contain or have the potential to contain information important to history or prehistory. However, with the application of various policies and mitigation measures, impacts to historic and archaeological resources are assumed to be "less than significant." It is unclear from the analysis that cultural resources will actually be protected by such policies and measures to the extent that they would not be significantly affected by the Proposed Project.

In Section 2.5 "Cultural Resources" of Table S-3 and various other sections of the Draft SEIR contain information indicating that the "Modified Project" alternative is likely to result in less impacts to historical and archaeological resources when compared to Proposed Project, and that implementation of the "No Project" alternative is likely to result in greater impacts when compared to the Proposed Project. However, under the mitigation process proposed in the Draft SEIR, impacts to historic and archaeological resources would be "less than significant" with the implementation of mitigation measures for the Proposed, Modified, and No Action alternatives. This assumption is based on the assumption in advance that historic and archaeological resources are distributed evenly throughout the FCI lands. Depending on the actual distribution of these resources within the FCI lands, the differences in potential impacts between the implementation of the Proposed, Modified, and No Action alternatives could be substantially different than those assumed in the Draft SEIR. The only real difference between the implementation of any one of these three scenarios would be the potential for significant impacts, not actual impacts, assuming the implementation of policies and mitigation measures always result in "less than significant" impacts. As a result, the comparison of these three scenarios is of no actual quantitative or qualitative value for the purposes of identifying an "Environmentally Superior" course of action.

Page 12 of the "County Cultural Guidelines" states that "Determining what is an important cultural resource worth preserving [sic] is a subjective and interpretive process; therefore, it is useful to utilize a standard assessment approach to evaluate cultural resources. In order to evaluate cultural resources, a comprehensive assessment must be conducted, including measuring the resource against the State CEQA Guidelines provisions and criteria established by the National Register of Historic Places, the California Register of Historical Resources, and the San Diego County Local Register of Historical Resources, and the Resource Protection Ordinance as well as assessing the integrity of the resource." Without any actual assessment or evaluation of historic and archaeological resources within the FCI Lands project area, there is no quantitative or qualitative basis for comparing the various courses of action, selecting an "Environmentally Superior" alternative, determining whether the recommended mitigation measures identified for the proposed Project should be adopted or modified, or determining if additional mitigation measures should be required for this project, as the Draft FCI Lands SEIR does not adequately describe the impacts of the Proposed Project on historic and archaeological resources.

Hazards and Hazardous Materials

The section that deals with Wildland Fire (2.6.3.7) concludes that the Proposed Project would have significant impacts related to wildland fire, while suggesting that regulations, implementation programs, and mitigation measures would reduce those impacts. In the

Mitigation Measures section (2.6.4.7), several mitigation measures are deemed infeasible that would dramatically reduce losses of homes and lives through restricting development in areas with more than a moderate fire hazard or requiring extensive fuel modification around development. Instead, the analysis determines that "one of the primary objectives of the project which is to accommodate a reasonable amount of growth" renders these mitigation measures infeasible. Apart from the fact that this conclusion disregards the remainder of project objectives, it also suggests that it is more valuable to allow growth in high and very high fire hazard areas than to protect those homes and people from the very hazards that the mitigation measures were designed to prevent. The end result of increasing population density on the former FCI lands will be greater losses of lives and property to recurrent wildland fire.

On a related note, the sections that Deal with Emergency Response and Evacuation Plans (2.6.3.6 and 2.6.4.6) conclude that significant impacts will be avoided through regulations, implementation programs, and mitigation measures. Three of the four measures presented, however, do not reflect the reality of the roads that would provide access to many of the FCI lands. These roads generally lack an interconnected road network, multiple ingress and egress routes, and suitability for use as rural roads serving residential subdivisions. The hazards of unsuitable escape routes resulting from these conditions along with the above-mentioned permission to develop in areas with high to very high fire hazards makes the likelihood even greater that implementation of the proposed project would lead to tragic losses of life and property.

Land Use

Given that the FCI lands are by definition in close proximity to the Cleveland National Forest, it is surprising to find no mention of our Land Management Plan in Section 2.8.3.2, which considers "Conflicts with Land Use Plans, Policies, and Regulations." As described in the beginning of this letter, increasing population density on FCI Lands would lead to numerous environmental and public health and safety issues on the Cleveland National Forest, as described in our 2005 Land Management Plan, and would accelerate problems that our Plan directs us to remedy. As a result, we call into question the determination that project impacts with regard to land use plans, policies, or regulations would be below a level of significance. The conflict of this project with our Land Management Plan should be investigated and disclosed as part of this analysis.

Nowhere is the disconnect between this project and our Land Management Plan greater than where the FCI lands are adjacent to or within designated or recommended wilderness areas. There is no mention of designated or recommended wilderness on the Cleveland National Forest or other federal lands managed by the Department of Interior. As such, there is no basis provided for evaluating the potential for the project to impact wilderness areas adjacent to FCI Lands. Potential project impacts on the wilderness resource could be significant and unavoidable, although it is not possible to perform a meaningful comparison of the effects of the different alternatives due to the lack of mention of wilderness in the Draft SEIR.

Section 2(c) of the Wilderness Act of 1964 (Public Law 88-577) defines wilderness: "A wilderness, in contrast with those areas where man and his own works dominate the landscape, is

hereby recognized as an area where the earth and its community of life are untrammelled by man, where man himself is a visitor who does not remain. An area of wilderness is further defined to mean in this Act an area of undeveloped Federal land retaining its primeval character and influence, without permanent improvements or human habitation, which is protected and managed so as to preserve its natural conditions and which (1) generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable; (2) has outstanding opportunities for solitude or a primitive and unconfined type of recreation..."

In summary, the key elements of wilderness include its natural state (biological and other natural processes operating unimpaired, uninhibited, and unchanged by humans), opportunities for solitude and primitive recreation opportunities, undeveloped character, and untrammelled (unmanaged) nature.

Increased density and development near or adjacent to designated or recommended wilderness areas would likely adversely affect the wilderness resource in a number of ways. Increased population in the County, particularly in rural areas, may result in increased use of wilderness, therefore impacting opportunities for solitude and primitive recreation opportunities. The visual impact of subdivisions on the wilderness user is also due consideration. Development in the vicinity of wilderness increases the likelihood that non-native, invasive species would be introduced into wilderness, thereby disrupting natural processes within the wilderness. Development upstream within watersheds shared by wilderness increases the likelihood of impaired water quality or decreased stream flows in wilderness due to runoff, impoundments, and/or groundwater use. Similarly, development adjacent to wilderness increases the likelihood that landowners build trespass structures, roads, or trails in wilderness, or use motorized or mechanized equipment in wilderness, thereby impacting its undeveloped character. Finally, increased development and density near wilderness increases the likelihood that fire management activities would impact the wilderness resource during wildfire events, which impacts the natural and untrammelled characteristics of wilderness.

Recreation

While the SEIR presents a very broad analysis of the effects of the project on recreation facilities, it does not contain any discussion or analysis of recreation activities in undeveloped, backcountry areas accessed by trail or cross-country travel. Increased recreation in undeveloped, backcountry areas can have substantial adverse effects on the environment, including litter, graffiti, impaired water quality, erosion, increased risk of wildfire, and various impacts to vegetation, wildlife, and cultural resources.

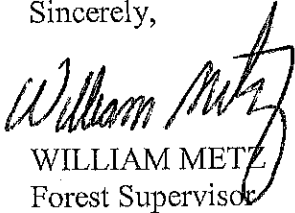
Increased population in the County would likely lead to an increase in recreation in both developed facilities and undeveloped, backcountry areas. While this increased use could have beneficial recreational impacts, the SEIR should include an analysis of environmental impacts that result from recreation in undeveloped backcountry areas, as it does for developed facilities.

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

Attachment 2
(Letter to County Supervisors_FCI Lands)



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
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(800) 735-2922 CRS

File Code: 1560

Date: June 20, 2014

Board of Supervisors
San Diego County
1600 Pacific Highway
San Diego, CA 92101

Dear Supervisors,

This letter regards the Forest Conservation Initiative (FCI) Lands General Plan Amendment scheduled for a land use map decision at your upcoming Board of Supervisors meeting on June 25th, 2014. We appreciate the consideration that San Diego County Planning and Development Services staff have given to our concerns about impacts to the Cleveland National Forest throughout the planning process. For detailed comments on the project's Draft Supplemental Environmental Impact Report (SEIR), please refer to our letter dated March 18th, 2013.

The Forest Conservation Initiative was approved by the voters of San Diego County because "(t)remendous development pressures in San Diego County are resulting in the rapid fragmentation and destruction of the Cleveland National Forest... The Cleveland National Forest is one of the largest expanses of undisturbed, natural open space in Southern California and as such is valuable as a watershed, agricultural area, and recreational area for the citizens of San Diego County... The unique resources of the Cleveland National Forest are of such significance that development on parcels within the Forest must be restricted." Over the two decades since its passage, the development pressures on the Cleveland National Forest have only grown, while the unique resources of the Cleveland National Forest have become even more vulnerable.

The Cleveland National Forest Land Management Plan identifies three primary management challenges – urbanization, fire, and wildlife and plants – which are interconnected and would be exacerbated by increased development on the FCI Lands. We understand that the County's current zoning status is far denser than the FCI allowed and that alternatives may therefore reduce development density by comparison. For clarity, the term "increased development" is used throughout this letter to refer to the construction, additional residents, and associated activity that is likely to result from the subdivision of lands relative to their former restriction of one dwelling unit per 40 acres.



Urbanization

Watershed protection for San Diego was the primary purpose for the establishment of the Cleveland National Forest. Increased development of the FCI Lands would reduce the Forest's water supply and quality due to increased road density, ground disturbance, impervious surfaces, groundwater withdrawals, and pollution. Not only would this affect San Diego's water supply, it would also degrade habitats dependent upon the Forest's water resources.

Increased development of the FCI Lands would also lead to management challenges for the Cleveland National Forest. Boundary issues including marking, encroachment, and unauthorized uses would increase, resulting in resource damage and increased costs for surveys, enforcement, litigation, and restoration. Infrastructure needs, such as water systems, energy delivery, or road widening, are often expected of Cleveland National Forest lands but result in impacts and preclude other uses of an area. Where FCI Lands are adjacent to Congressionally-designated or agency-recommended Wilderness areas, increased development would degrade the wilderness character for which they were protected and increase the challenges of wilderness management.

Fire

Increased development of the FCI Lands would present many challenges to fire managers with respect to the threat and prevention of wildland fire. San Diego County has a long history of large, devastating wildfires that have resulted in significant losses of structures, natural resources, and even human lives. A higher density of development than currently exists on FCI Lands would create more Wildland/Urban Interface area which would be at risk of loss or damage due to wildland fire. Recent research in San Diego County (Syphard et al. 2013) indicates that "leapfrog" development – i.e. isolated clusters of development surrounded by undeveloped land, as is the case for the FCI Lands – is predicted to have the highest fire risk to the largest proportion of structures, while "expansion" or "infill" development are predicted to have lower risk. To summarize, increased development of FCI Lands could potentially lead to increased losses of structures, natural resources, and even human lives.

Increased development of the FCI Lands would require additional firefighting personnel and resources to address structure protection issues during wildland fire events. This would increase fire suppression costs significantly for the responsible agencies to upwards of \$1M per day for large fires, while also putting more firefighters at risk. The need for structure protection can also divert resources away from a focus on putting out the fire. The lack of available water to aid fire suppression activities is another concern for increased development on FCI lands. Additional fire suppression and support resources would be required to address these issues even in the event of small wildland fires near FCI Lands.

Increasing the number of structures and residents on FCI Lands would lead to an increase in the number of human-caused fires. Well over 90% of all wildland fires in southern California are

human-caused. Due to the increased risk of human-caused fires, a significant investment in increased fire prevention activities would need to be made. This would include community fire prevention education programs, residential wildland fire safety hazard inspections, and residential burn permit inspections. The Cleveland National Forest does not currently have the staffing or budget capability to support this extra workload in our Direct Protection Areas.

Increased development on FCI Lands will create a need and want by residents for increased hazardous fuels reduction projects to protect structures in their vicinity. The Cleveland National Forest does not currently have the staff or financial capacity to accommodate additional fuels reduction projects for new developments, which would also render Forest lands less valuable for other uses and resources.

A higher population on FCI Lands would result in increased and significant difficulties for fire and law enforcement personnel relative to the evacuation of residents in rural or remote subdivisions. We consider the current road systems in and adjacent to FCI Lands to be of insufficient capacity to safely meet the needs of a large-scale evacuation in the event of a wildland fire. This would lead to increased safety issues associated with the egress of residents and ingress of responding fire and law enforcement personnel and equipment.

For any new developments on FCI Lands, it is critical that a minimum setback of 100 feet, and more in certain cases, be required for the construction of any structures adjacent to Cleveland National Forest lands in all areas. Defensible space for structures should be required, developed, and maintained solely on private land and should be the responsibility of property owners. The need for defensible space can extend beyond the minimum of 100 feet, especially along canyon rims and steep slopes.

Finally, it is worth noting that the Draft SEIR for this General Plan Update found that “implementation of the proposed Project would result in significant and unavoidable direct and cumulative impacts related to wildland fires.” This refers specifically to “exposing people or structures to a significant risk of loss, injury, or death involving wildland fires,” which would occur despite the implementation of mitigation measures. The acknowledgement of significant impacts relative to wildland fires suggests a transfer of fire risk from San Diego County to firefighting entities and future residents of FCI Lands.

Wildlife and Plants

Not only is San Diego County the most biodiverse county in the United States, this biodiversity is also among the most threatened nationwide. While the Cleveland National Forest is often viewed as a species refuge, this role would be compromised by increased development of FCI Lands due to habitat loss and fragmentation, introduction and spread of invasive species, and increased wildfire for ecosystems already threatened by overly frequent fire. These impacts could contribute to species extirpation as well as additional listings under the Endangered

Species Act. In the Alpine area, for example, the Hermes Copper Butterfly was added in 2011 to the list of candidate species for Endangered Species Act protection and would be further threatened by increased development. A scientific literature review by the Conservation Biology Institute (2005) for San Diego County found that biodiversity impacts for a range of species are discernable at the density of one dwelling unit per 40 acres and become progressively greater with increasing density.

Alternatives

The term “buffer” and its appropriate zoning became a focus of the San Diego County Planning Commission meetings in late 2013 regarding this General Plan Amendment for the Forest Conservation Initiative Lands. For the purposes of managing the Cleveland National Forest, the greater the minimum lot size of adjacent lands, the more effective the buffer they provide in terms of preventing resource impacts. As a result, we support the Environmentally Superior alternative analyzed in the Draft SEIR, since it would have the least impact on the Cleveland National Forest and the least fire risk. We also believe that this alternative would be most consistent with the following San Diego County General Plan Objectives: 1) promote environmental stewardship that protects the range of natural resources and habitats that uniquely define the County’s character and ecological importance, and 2) ensure that development accounts for physical constraints and the natural hazards of the land.

Regarding the Staff Recommendation, we find that County staff have carefully balanced our concerns against community desires for growth. While its resource impacts to the Cleveland National Forest and fire risk would be greater than the Environmentally Superior alternative, lower densities for remote areas and along the Forest boundary would help to curtail impacts and fire risk. The Planning Commission Recommendation would impact the Cleveland National Forest to a greater degree than the Staff Recommendation, and the associated resource damage and fire risk would be substantial, particularly in the Alpine Planning Area.

Specific Areas

In the vicinity of Alpine Planning Areas of Consideration AL-3, 5, 6, 7, 8, and 11, management of Cleveland National Forest lands is already challenging due to the complex land ownership pattern. This would make habitat fragmentation even more likely to lead to losses of species diversity, and development effects would be magnified. The complex arrangement would also enable fires to spread more readily among the FCI Lands across vegetated Cleveland National Forest lands, as was recently seen with the Bernardo Fire.

The Interstate 8 travel corridor has a markedly high wildland fire occurrence history that would be problematic for increased development due to its close geographic relationship and increased fire threat to these lands. Moreover, much of the area proposed for increased development lies within or adjacent to the Sweetwater Canyon, which is oriented in a north-east by south-west

direction. This is particularly problematic from a wildland fire standpoint as the canyon funnels Santa Ana winds from the east/north-east as well as prevailing winds from the west/south-west, while the steep terrain enables fire to climb out of the canyon. There is considerable fire history in the area, including the Laguna, Viejas, and Cedar Fires, and some of the FCI Lands have burned as many as five times in the past 90 years.

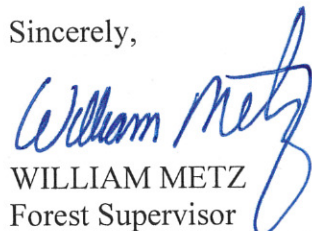
The Pine Creek and Horsethief canyons and Wilderness lands to the east of AL-8 are similarly aligned with both Santa Ana and prevailing winds. Cleveland National Forest lands with heavy fuel loads in this vicinity make it particularly hazardous from a fire suppression standpoint. For all of the FCI Lands in the Alpine Planning Area, we consider the existing two-lane roads that funnel traffic to be insufficient for the widespread evacuations that would be needed for more residents in the event of a wildland fire. This situation would therefore complicate both ingress and egress, compromising public safety.

The Staff Recommendation would lead to resource impacts to the Cleveland National Forest and increased fire risk in the Alpine Planning Area, but not to the degree of the Planning Commission Recommendation. It is worth noting that even under the Staff Recommendation, the number of homes in the Alpine Planning Area could more than double the potential under FCI restrictions (2,910 versus 1,392, respectively), and so it is imperative that any development that occurs incorporate the greatest protections possible against wildfire and resource impacts.

Cuyamaca Planning Area of Consideration CU-1 and Jamul Planning Area of Consideration JD-1 lie among the most remote areas of the Cleveland National Forest. The parcels in CU-1 fall within the proposed Eagle Peak Recommended Wilderness area, which is in the final stage of adoption. Those in JD-1 lie between two existing Wildernesses, Pine Creek and Hauser, and are generally accessed by a narrow road that passes through Pine Creek Wilderness. Increasing the number of residents in such remote areas would affect the adjacent wilderness character, add to fire risk and other management challenges, and introduce new impacts to relatively intact lands. The minimum density (RL-80) recommended by Staff would minimize these impacts.

Thank you for considering our concerns and the importance of the Cleveland National Forest to San Diego County as you prepare for your decision about the fate of the FCI Lands. Please direct any questions about this matter to Jeff Heys, Forest Planner, at (858) 674-2959.

Sincerely,


WILLIAM METZ
Forest Supervisor

References

Conservation Biology Institute. 2005. Analysis of General Plan-2020 San Diego County. Encinitas, California.

Syphard, A.D., A. Bar Massada, V. Butsic, and J.E. Keeley. 2013. Land use planning and wildfire: development policies influence future probability of housing loss. PLoS ONE 8(8): e71708. doi:10.1371/journal.pone.0071708.

Attachment 3

(FCIlands_2nd comment period letter)



File Code: 1560

Date: February 29, 2016

Mark Wardlaw, Director
San Diego County Planning and Development Services
ATTN: FCI Lands General Plan Amendment
5510 Overland Avenue, Suite 310
San Diego, California 92123

Dear Mr. Wardlaw,

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. We also appreciate the consideration given to our input by San Diego County Supervisors and staff throughout this process, including the designation of a Special Study Area in Eastern Alpine. The Forest's comments herein include comments previously submitted during the scoping period, as well as comments on both the initial and re-circulated Draft Supplemental Environmental Impact Reports (SEIRs).

Altogether, we remain 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 find that these impacts are neither adequately disclosed in the Draft SEIR nor consistent with the objectives of the County of San Diego General Plan. Our review of the re-circulated Draft SEIR has revealed that no responses were provided to our comments on the initial Draft SEIR, nor did they result in changes to the analysis. It is also worth noting that the areas of the Cleveland National Forest proposed for recommended wilderness status at the time of our previous comments were granted this highest level of agency protection in October 2014.

We find that the best way to protect both the environment and public health and safety in the vicinity of the FCI lands, including the Cleveland National Forest, would be to select the Environmentally Superior Modified FCI Condition Alternative. In addition, we request provisions that development on private lands will not rely on the Cleveland National Forest for infrastructure or vegetation management needs and that impacts to the Cleveland National Forest from such development will be avoided, minimized, or mitigated.

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.



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 self-sufficiency 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 or recommended 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 higher 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 in this area 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 Modified FCI Condition Alternative would best prevent the environmental and public health and safety impacts described above. More detailed information about these and other concerns are available in an attached letter to the County Board of Supervisors dated June 20, 2014.
- **Jamul CPA – Skye Valley Ranch.** The Forest would recommend continuing the RL-80 zoning on these parcels. The bridge over Pine Creek near Barrett Honor Camp is insufficient for any traffic, even in an emergency, and will not be improved or replaced since it falls within the Pine Creek Wilderness. Additionally, these parcels border two existing federally designated wilderness areas (Pine Creek Wilderness and Hauser Wilderness) and are completely surrounded by NFS lands. Further improvement of infrastructure to this area, such as utilities and road access, required for a smaller lot size zoning would have a negative impact on wilderness values, increase the need for fuels treatments, and raise potential for the issues and impacts described above.
- **Areas west of Cuyamaca CPA.** The Forest supports RL-80 zoning for parcels adjacent to the Cuyamaca CPA along Boulder Creek Road. These parcels are located in a very undeveloped and fire prone part of the Cleveland National Forest and are adjacent to lands zoned as recommended wilderness.
- **Descanso CPA.** The Forest encourages the County to retain the lower density RL-80 zoning. The northern part of the Descanso CPA abuts two areas zoned as recommended wilderness. Also adjacent to the north Descanso CPA is the King Creek Research Natural Area, which contains a rare population of Cuyamaca cypress, a Forest Service sensitive species. All of the King Creek stands burned in a fire in 1950 and most of the area re-burned in the 2003 Cedar Fire. Post-Cedar Fire regeneration is expected to be adequate to repopulate the stands because trees were old enough to have substantial cone banks at the time of the fire; however, it is important to protect the stand from overly frequent fire especially at this vulnerable time.

- **Pine Valley CPA.** The Forest encourages the County to retain the lower density RL-80 zoning. This area contains many of the highest recreational and scenic values to be found on the Cleveland National Forest. Parcels in this CPA south of Interstate 8 are directly adjacent to the federally designated Pine Creek Wilderness. Parcels along Sunrise Highway are adjacent to the Mount Laguna National Recreation Area. The Forest also supports maintaining the proposed RL-40 zoning adjacent to Buckman Springs Road because the NFS land to the east is zoned as Back Country Non-Motorized, which is the most restrictive zoning other than recommended wilderness and designated wilderness. In addition, the Pacific Crest Trail, a 2,650-mile national scenic trail that runs from Mexico to Canada through California, Oregon and Washington, traverses this area before moving onto the National Forest. Retaining the current density limit would help maintain the recreational and scenic values.
- **Central Mountain CPA.** We recommend RL-80 zoning for parcels in the Central Mountain CPA where RL-40 zoning in the adjacent Julian CPA was extended into parcels within the Cleveland National Forest. This recommendation affects two contiguous parcels that are adjacent to the Upper San Diego River Canyon. The Upper San Diego River is an area of rugged topography and high fire danger and is zoned as recommended wilderness.
- **Pendleton – De Luz CPA.** The Forest recommends reducing the allowable density to RL-80 in areas surrounded by NFS lands in the Pendleton - De Luz CPA. These parcels are directly adjacent to the federally designated San Mateo Canyon Wilderness area. The parcels on Miller Mountain contain unique botanical resources and would require major road improvements across NFS lands if developed.
- **North Mountain CPAs.** The Forest supports RL-80 zoning in the North Mountain CPA and encourages the county to retain this zoning through the planning process. We are uncertain of the proposed density for the triangular parcel on the north side of Warner Springs, which abuts the Caliente recommended wilderness. Reducing the density for this parcel to the RL-80 zoning would better buffer the recommended wilderness area from adjacent land uses.

Comments on the Draft Supplemental Environmental Impact Report

The Draft SEIR should clearly make the case that the objectives presented in Chapter 1.3, as drawn from the County of San Diego General Plan, are met by the Proposed Project. In our view, the document fails to demonstrate that the Proposed Project meets the majority of the objectives and instead includes evidence that objectives will not be met. Other than stakeholder participation, the only objective that the Proposed Project could meet is the first one listed – “Support a reasonable share of projected regional population growth;” – and we feel that it fails to meet even this objective, because the failure to meet the remainder of the objectives renders the share of growth unreasonable. The Proposed Project clearly conflicts with 6 of the 10 objectives, as the rationale beneath each objective below demonstrates:

- Promote sustainability by locating new development near existing infrastructure, services, and jobs.
 - Remote parcels within and adjacent to the Cleveland National Forest are far from infrastructure, services, and jobs.
- Promote environmental stewardship that protects the range of natural resources and habitats that uniquely define the County’s character and ecological importance.
 - Increased development on remote parcels within and adjacent to the Cleveland National Forest threatens many of the 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.
 - Remote parcels within and adjacent to the Cleveland National Forest experience severe risk of wildland fire incursion.
- Provide and support a multi-modal transportation network that enhances connectivity and supports community development patterns.
 - Remote parcels within and adjacent to the Cleveland National Forest are accessible only by passenger vehicle and road access is substandard for general residential use.
- Maintain environmentally sustainable communities and reduce greenhouse gas emissions that contribute to climate change.
 - Remote parcels within and adjacent to the Cleveland National Forest would not be environmentally sustainable for numerous reasons cited throughout this letter, and the development and access would increase greenhouse gas emissions that contribute to climate change.
- Minimize public costs of infrastructure and services and correlate their timing with new development.
 - Remote parcels within and adjacent to the Cleveland National Forest would maximize public costs of infrastructure and services.

The assumption is made throughout the analysis of potential impacts that “regulations, implementation programs, and mitigation measures from the General Plan Update EIR” will result in impacts that fall below the threshold of significance. This assumption is flawed in that it fails to recognize the irretrievable losses to natural and cultural resources involved when subdividing new areas of an already densely populated region. The Draft SEIR presents numerous plans and projects considered in evaluating cumulative impacts, but it fails to include the impacts of the past development of San Diego County, as represented by the existing condition of the region. When viewed through this lens, further increases of population density in remote areas of the County will necessarily have significant impacts, regardless of “regulations, implementation programs, and mitigation measures.” The scope of the cumulative impacts section needs to be broadened to include development that has occurred up to the current time.

While the Draft SEIR considers many topics, it fails to offer the level of detail that would be needed to evaluate the environmental impacts of its alternatives. We feel that as a result of the vague nature of the analysis presented, environmental and public health and safety impacts have not been sufficiently analyzed or disclosed. Examples of these deficiencies are provided below by topic.

Biological Resources

With regard to description of the impacts of the FCI Lands project on biological resources, there is no description of the actual impacts, as no inventory, identification, or evaluation of such resources has been completed and the actual impacts are unknown. Instead, there is only a general discussion of potential project impacts on general plant and wildlife species. These are assumed to be significant and unavoidable for special status species, riparian habitat, and wildlife movement corridors (Table S-2). However, there is no identification of effects on individual species even though the project will adversely affect or is likely to adversely affect a number of federally-listed species including Arroyo Toad, California Gnatcatcher, and San Diego Thornmint as well as candidate species for listing such as Hermes Copper butterfly. The proposed alternatives will also adversely affect many of our Regional Forester’s list of Sensitive Species through direct mortality and habitat loss and fragmentation, creating difficulties for conserving their populations on NFS lands. The blanket approach taken by the Draft SEIR does not adequately describe and disclose effects on these species, effectively leaving this analysis to later piecemeal analyses that will be done for individual projects. This does not allow for meaningful protection and conservation of these species across broader areas and is therefore inconsistent with the purpose and intent of CEQA.

Given the lack of detail in the SEIR, it is not possible to perform a meaningful comparison of the effects of the different alternatives. The analysis does not provide enough information to determine which alternative would best conserve key resources.

Cultural and Paleontological Resources

Section 15123(b)(3) of the CEQA Guidelines requires that an EIR address the issues to be resolved, which includes the choices among alternatives and whether or how to mitigate significant impacts. As stated in the Draft FCI Lands SEIR, the major issues to be resolved regarding the project include decisions by the Lead Agency as to whether or not the Draft SEIR adequately describes the environmental impacts, whether the recommended mitigation measures identified for the Proposed Project should be adopted or modified, or if additional mitigation measures should be required.

In regard to adequate description of the impacts of the FCI Lands project on historic or archaeological resources, there is no description of the actual impacts, as no inventory, identification, or evaluation of such resources has been completed and the actual impacts are unknown. Instead, there is only a general discussion of potential project impacts, which are assumed in advance to be less than significant through the implementation of various policies and mitigation measures contained in the General Plan Update.

Table S-2, “Summary of Project Impacts” and various sections of the Draft FCI Lands SEIR contain information indicating that implementation of the Proposed Project would result in new development that would have the potential to result in substantial adverse changes to the significance of historical resources and cause a substantial adverse change in the significance of archaeological resources, including the destruction or disturbance of archaeological sites that contain or have the potential to contain information important to history or prehistory. However, with the application of various policies and mitigation measures, impacts to historic and archaeological resources are assumed to be “less than significant.” It is unclear from the analysis that cultural resources will actually be protected by such policies and measures to the extent that they would not be significantly affected by the Proposed Project.

In Section 2.5 “Cultural Resources” of Table S-3 and various other sections of the Draft SEIR contain information indicating that the “Modified FCI Condition” alternative is likely to result in less impacts to historical and archaeological resources when compared to Proposed Project, and that implementation of the “No Project” alternative is likely to result in greater impacts when compared to the Proposed Project. However, under the mitigation process proposed in the Draft SEIR, impacts to historic and archaeological resources would be “less than significant” with the implementation of mitigation measures for the Proposed, Modified, and No Action alternatives. This assumption is based on the assumption in advance that historic and archaeological resources are distributed evenly throughout the FCI lands. Depending on the actual distribution of these resources within the FCI lands, the differences in potential impacts between the implementation of the Proposed, Modified, and No Action alternatives could be substantially different than those assumed in the Draft SEIR. The only real difference between the implementation of any one of these three scenarios would be the potential for significant impacts, not actual impacts, assuming the implementation of policies and mitigation measures always result in “less than significant”

impacts. As a result, the comparison of these three scenarios is of no actual quantitative or qualitative value for the purposes of identifying an “Environmentally Superior” course of action.

Page 12 of the “County Cultural Guidelines” states that “Determining what is an important cultural resource worth preserving [sic] is a subjective and interpretive process; therefore, it is useful to utilize a standard assessment approach to evaluate cultural resources. In order to evaluate cultural resources, a comprehensive assessment must be conducted, including measuring the resource against the State CEQA Guidelines provisions and criteria established by the National Register of Historic Places, the California Register of Historical Resources, and the San Diego County Local Register of Historical Resources, and the Resource Protection Ordinance as well as assessing the integrity of the resource.” Without any actual assessment or evaluation of historic and archaeological resources within the FCI Lands project area, there is no quantitative or qualitative basis for comparing the various courses of action, selecting an “Environmentally Superior” alternative, determining whether the recommended mitigation measures identified for the Proposed Project should be adopted or modified, or determining if additional mitigation measures should be required for this project, as the Draft FCI Lands SEIR does not adequately describe the impacts of the Proposed Project on historic and archaeological resources.

Hazards and Hazardous Materials

The section that deals with Wildland Fire (2.6.3.7) concludes that the Proposed Project would have significant impacts related to wildland fire, while suggesting that regulations, implementation programs, and mitigation measures would reduce those impacts. In the Mitigation Measures section (2.6.4.7), several mitigation measures are deemed infeasible that would dramatically reduce losses of homes and lives through restricting development in areas with more than a moderate fire hazard or requiring extensive fuel modification around development. Instead, the analysis determines that “one of the primary objectives of the project which is to accommodate a reasonable amount of growth” renders these mitigation measures infeasible. Apart from the fact that this conclusion disregards the remainder of project objectives, it also suggests that it is more valuable to allow growth in high and very high fire hazard areas than to protect those homes and people from the very hazards that the mitigation measures were designed to prevent. The end result of increasing population density on the former FCI lands will be greater losses of lives and property to recurrent wildland fire.

On a related note, the sections that Deal with Emergency Response and Evacuation Plans (2.6.3.6 and 2.6.4.6) conclude that significant impacts will be avoided through regulations, implementation programs, and mitigation measures. Three of the four measures presented, however, do not reflect the reality of the roads that would provide access to many of the FCI lands. These roads generally lack an interconnected road network, multiple ingress and egress routes, and suitability for use as rural roads serving residential subdivisions. The hazards of unsuitable escape routes resulting from these conditions along with the above-mentioned

permission to develop in areas with high to very high fire hazards makes the likelihood even greater that implementation of the Proposed Project would lead to tragic losses of life and property.

Land Use

Given that the FCI lands are by definition in close proximity to the Cleveland National Forest, it is surprising to find no mention of our Land Management Plan in Section 2.8.3.2, which considers “Conflicts with Land Use Plans, Policies, and Regulations.” As described in the beginning of this letter, increasing population density on FCI Lands would lead to numerous environmental and public health and safety issues on the Cleveland National Forest, as described in our 2005 Land Management Plan, and would accelerate problems that our Plan directs us to remedy. As a result, we call into question the determination that project impacts with regard to land use plans, policies, or regulations would be below a level of significance. The conflict of this project with our Land Management Plan should be investigated and disclosed as part of this analysis.

Nowhere is the disconnect between this project and our Land Management Plan greater than where the FCI lands are adjacent to or within designated or recommended wilderness areas. There is no mention of designated or recommended wilderness on the Cleveland National Forest. As such, there is no basis provided for evaluating the potential for the project to impact wilderness areas adjacent to FCI Lands. Potential project impacts on the wilderness resource could be significant and unavoidable, although it is not possible to perform a meaningful comparison of the effects of the different alternatives due to the lack of mention of wilderness in the Draft SEIR.

Section 2(c) of the Wilderness Act of 1964 (Public Law 88-577) defines wilderness: “A wilderness, in contrast with those areas where man and his own works dominate the landscape, is hereby recognized as an area where the earth and its community of life are untrammeled by man, where man himself is a visitor who does not remain. An area of wilderness is further defined to mean in this Act an area of undeveloped Federal land retaining its primeval character and influence, without permanent improvements or human habitation, which is protected and managed so as to preserve its natural conditions and which (1) generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable; (2) has outstanding opportunities for solitude or a primitive and unconfined type of recreation...”

In summary, the key elements of wilderness include its natural state (biological and other natural processes operating unimpaired, uninhibited, and unchanged by humans), opportunities for solitude and primitive recreation opportunities, undeveloped character, and untrammeled (unmanaged) nature.

Increased density and development near or adjacent to designated or recommended wilderness areas would likely adversely affect the wilderness resource in a number of ways. Increased population in the County, particularly in rural areas, may result in increased use of wilderness, therefore impacting opportunities for solitude and primitive recreation opportunities. The visual impact of subdivisions on the wilderness user is also due consideration. Development in the vicinity of wilderness increases the likelihood that non-native, invasive species would be introduced into wilderness, thereby disrupting natural processes within the wilderness. Development upstream within watersheds shared by wilderness increases the likelihood of impaired water quality or decreased stream flows in wilderness due to runoff, impoundments, and/or groundwater use. Similarly, development adjacent to wilderness increases the likelihood that landowners build trespass structures, roads, or trails in wilderness, or use motorized or mechanized equipment in wilderness, thereby impacting its undeveloped character. Finally, increased development and density near wilderness increases the likelihood that fire management activities would impact the wilderness resource during wildfire events, which impacts the natural and untrammeled characteristics of wilderness.

Recreation

While the SEIR presents a very broad analysis of the effects of the project on recreation facilities, it does not contain any discussion or analysis of recreation activities in undeveloped, backcountry areas accessed by trail or cross-country travel. Increased recreation in undeveloped, backcountry areas can have substantial adverse effects on the environment, including litter, graffiti, impaired water quality, erosion, increased risk of wildfire, and various impacts to vegetation, wildlife, and cultural resources.

Increased population in the County would likely lead to an increase in recreation in both developed facilities and undeveloped, backcountry areas. While this increased use could have beneficial recreational impacts, the SEIR should include an analysis of environmental impacts that result from recreation in undeveloped backcountry areas, as it does for developed facilities.

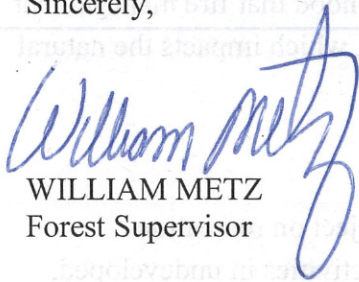
Conclusion

We appreciate the development and consideration of the Modified FCI Condition (Environmentally Superior) Alternative as described in Chapter 4.1. From our perspective, the sacrifice of 28% of the residential dwelling units of the Proposed Project would be worth the resultant protection of resource conditions and reduction of wildfire risk to communities and would best achieve the objectives of the General Plan. Moreover, the areas where the lower densities would be located, as specified in the Modified FCI Condition Alternative, are precisely the areas where resource and wildfire concerns are greatest. As a result, we strongly support the adoption of the Modified FCI Condition Alternative rather than the Proposed Project. In addition, we request provisions that development on private lands will not rely on the Cleveland

National Forest for infrastructure or vegetation management needs and that impacts to the Cleveland National Forest from such development will be avoided, minimized, or mitigated.

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 re-circulated 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

Alpine Community Plan Update

Sept. 18, 2018 SEIR Scoping Meeting - Comment Sheet

as an alpine resident and homeowner since 1991
I am on record requesting to keep alpine's
status as a small town. No more apartments,
Section 8 or high density projects. Keep
Alpine's integrity. Development is inevitable
but it should be done with the best interest
of alpine in mind. Higher End homes only
no less than one acre is preferable. No
postage stamp developments.

Kim DeClair 9/30/18
Kim DeClair
1630 Huey Lane
Alpine CA 91901



County of San Diego

MARK WARDLAW
DIRECTOR

PLANNING & DEVELOPMENT SERVICES
5510 OVERLAND AVENUE, SUITE 310, SAN DIEGO, CA 92123
(858) 694-2962 • Fax (858) 694-2555
www.sdcounty.ca.gov/pds

KATHLEEN A. FLANNERY
ASSISTANT DIRECTOR

ALPINE COMMUNITY PLAN UPDATE SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT

SEPTEMBER 18, 2018 SEIR PUBLIC SCOPING MEETING - COMMENT SHEET

We attended the meeting on 9/18/18 and my husband and I vote for the "No approach". We are under the belief that Alpine should stay rural & quaint. That's what makes this place to live so special and not like the other cities. It's nice to have nature around you w/o adding more people, more traffic & more pollution. Honestly when is enough - enough. How much land do we have to take utilize for ourselves. Why does ever ything else have to pay the price (animals, trees, nature) for our Ego. Here's a quote - Only when the last tree has died, & the last river has been poisoned & the last fish has been caught will we realize we can't eat.

Submit by Mail, Fax or Email. Comments must be received no later than October 1, 2018 at 4:00 p.m.
Greg Kazmer, Environmental Coordinator
County of San Diego
Planning and Development Services
5510 Overland Ave., Suite 310
San Diego, CA 92123

Email: gregory.kazmer@sdcounty.ca.gov

FAX: (858) 694-2555

Phone: (858) 505-6857

Noelle Flores 10/1/18
Noelle Flores
767 Arnold Way
Alpine CA 91901



County of San Diego

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KATHLEEN A. FLANNERY
ASSISTANT DIRECTOR

ALPINE COMMUNITY PLAN UPDATE SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT

SEPTEMBER 18, 2018 SEIR PUBLIC SCOPING MEETING - COMMENT SHEET

Bringing water & Sewage Services to East Willows Rd. is most important. As Vegas relies solely on ground water for the 24 hr casino activities & Hotels the excessive usage of water using wells will eventually sooner if not later put us at risk with our own wells. After 20+ years of working to change the zoning to commercial zoning we succeeded 12/2016. We now need services to complete this and be able to keep up with the growth of Vegas casinos plans.

Submit by Mail, Fax or Email. Comments must be received no later than October 1, 2018 at 4:00 p.m.

Greg Kazmer, Environmental Coordinator
County of San Diego
Planning and Development Services
5510 Overland Ave., Suite 310
San Diego, CA 92123

Email: gregory.kazmer@sdcounty.ca.gov

FAX: (858) 694-2555

Phone: (858) 505-6857

Larry Freeland 10/1/18

Commenter Signature, Date

Larry Freeland

Print Name

5301 Willows Rd

Address

Alpine, CA 91901

City, State, Zip Code



County of San Diego

MARK WARDLAW
DIRECTOR

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KATHLEEN A. FLANNERY
ASSISTANT DIRECTOR

ALPINE COMMUNITY PLAN UPDATE SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT

SEPTEMBER 18, 2018 SEIR PUBLIC SCOPING MEETING - COMMENT SHEET

NO SECTION 8 OR MORE APARTMENTS
IN ALPINE. HIGH \$ HOMES ON 1
ACRE OR 4 ACCEPTIBLE.

Submit by Mail, Fax or Email. Comments must be received no later than October 1, 2018 at 4:00 p.m.

Greg Kazmer, Environmental Coordinator
County of San Diego
Planning and Development Services
5510 Overland Ave., Suite 310
San Diego, CA 92123

Email: gregory.kazmer@sdcounty.ca.gov

FAX: (858) 694-2555

Phone: (858) 505-6857

Ellen L. Haberton 9-29-18
Commenter Signature, Date

ELLEN L. HABERTON

Print Name

2250 WILLIAMS RD.

Address

ALPINE, CA 91901

City, State, Zip Code

From: [Charles Hansen](#)
To: [Kazmer, Gregory](#)
Subject: Notice of Preparation Documentation, dtd 8/28,2018
Date: Thursday, August 30, 2018 7:18:56 PM

Surely you jest!

Please send plain English version of this notice so that the average person like myself can read and understand it. Loading it with acronyms is bad enough. Referencing Project numbers that are untraceable in the county data base is ridiculous.

Show this to your mother. See if she can understand it.

What is the matter with you people?

Hey boss...I sent the letter to the folks. It isn't my problem if they can make head or tails out of it.

Shaking my head in Alpine,

C. E. Hansen
23758 Japatul Valley Road
Alpine, Ca 91901

From: [Cara Lacey](#)
To: [Kazmer, Gregory](#)
Cc: [Trish Smith](#); [Dan Silver](#)
Subject: Alpine Community Plan Update
Date: Wednesday, September 05, 2018 10:29:05 AM
Attachments: [image001.png](#)

Hi Greg,

I hope you are doing well!

Can you please let me know – are you considering Transfer of Development Rights (TDRs) as part of the Alpine Update and Alpine SEIR?

We have written two comment letters on this topic and Dan Silver has also made similar comments.

Before I comment again, I wanted to understand if the SEIR that will be prepared will consider TDRs within the Community Plan, or not.

With our comments on the documents recently, we never received responses.

Please let me know and thank you!

Cara

Please consider the environment before printing this email.

Cara Lacey, AICP, LEED AP
Associate Program Director
Land Networks, California
cara.lacey@tnc.org
(619) 684-7029 (Phone)

The Nature Conservancy
San Diego
402 West Broadway,
Suite 1350
San Diego, CA 92101

nature.org

From: [Lopez, Rosa](#)
To: [Kazmer, Gregory](#)
Subject: COMMENT RE: Alpine Comm. Plan Update Notice - Dated Aug. 28, 2018
Date: Friday, September 14, 2018 9:31:00 AM
Attachments: [Ltr from County of SD \(Aug. 28, 2018\).pdf](#)

Good Morning Mr. Kazmer,

This is in response to the Notice we received (copy attached) regarding the Alpine Community Plan Update. I plan to attend the meeting on Sept. 18th at 6:00 p.m. at the Alpine Branch Library to learn more about this project and what it entails.

Does this plan include resurfacing or overlaying any of the existing streets/road in Alpine – specifically Louise Drive? Louise Drive is horrendous and is in dire need of re-asphalting as the pot holes, sink holes, trenches, and ruts are getting worse and have caused much damage to our vehicles. We have no other access road to our home from Alpine Blvd. We live at 2729 Blueberry Hill (at the top of Louise Drive). I understand that this is an unincorporated area and would like to know if the County has any plans to “fix” Louise Drive. If not, can you please provide information on what mechanism is in place (if any) to get Louise Drive repaired? Are there any grants, or other funding available to the County or property owners for such repairs? Is it possible to have Louise Drive resurfaced in conjunction with an existing project in Alpine? In addition, are there any plans to open South Grade Road to Blueberry Hill? Google maps sends everyone to South Grade Road to get to Blueberry Hill, yet there is no access.

I work for the City of San Diego Maintenance Assessment Districts and we work with property owners in the City on maintenance and repair projects. Sometimes we are able to get community requested projects completed in conjunction with existing current project to minimize the financial burden on property owners. Is this possible in this situation? Are there any other suggestions you may have to help us to make our neighborhood more inhabitable?

Any assistance you can provide as to how we can go about re-asphalting Louise Drive in Alpine will be greatly appreciated.

Thank you,
Rosa & Ed Lopez
2729 Blueberry Hill
Alpine, CA 91901



Manzanita Band of the Kumeyaay Nation

September 25, 2018

Mr. Greg Kazmer, Environmental Coordinator
County of San Diego, Planning & Development Services
5510 Overland Avenue, Suite 110
San Diego, CA 92123-1239
Gregory.Kazmer@sdcounty.ca.gov

RE: Alpine Community Plan Update & General Plan
PDS2016-GPA-16-011
PDS2018-ER-18-00-002

Dear Mr. Kazmer:

The Manzanita Band of the Kumeyaay Nation ("Tribe), also known as the Manzanita Band of Diegueno Mission Indians, is a federally recognized Self-Governance Indian Tribe that operates pursuant to its Constitution and Bylaws adopted on July 12, 1975 pursuant to the Indian Reorganization Act and approved by the Commissioner of Indian Affairs on January 9, 1976, and possesses inherent powers of self-governance with duties, rights, responsibilities, and with power and authority over the lands within the exterior boundaries of the Manzanita Indian Reservation.

The Manzanita Band is one of twelve Bands of the Kumeyaay Nation whose aboriginal territory is from the Pacific Ocean to the desert and approximately 75 miles north and south of the international border and as far as the Colorado River adopted by the State of California through Assembly Joint Resolution No. 60 on the 29th day of August 2002. The Manzanita Band of the Kumeyaay Nation is also traditionally and culturally affiliated with cultural resources now submerged in the Pacific Ocean from 3 to 17 kilometers further westward than today's coastline and as far as we could travel to harvest marine resources. Therefore, the Manzanita Band also strives to protect known and unknown cultural resources within the aboriginal territory.

The Manzanita Band has reviewed the August 30, 2018 Notice of Preparation for Updates to the Alpine Community Plan and CEQA Initial Study – Environmental Checklist. The Manzanita Band is very familiar with the cultural sensitive areas of the Alpine Community Plan and the County of San Diego. Therefore, the Manzanita Band hereby requests formal government-to-government consultation and consultation pursuant to Senate Bill 18 and Assembly Bill 52. The Manzanita Band would like to participate in any collective tribal consultations as well as individual consultation. The Manzanita Band has initiated consultation early in the process to ensure the following items, as well as additional comments, are included in the Alpine Community Plan Update and future General Plan Updates:

How will the County address changes to CEQA Guidelines with the expanded definition to include impacts on Tribal Cultural Resources in both the Alpine General Plan and County General Plan. The previous EIRs did not include analysis of Tribal Cultural Resources?

How will the County update EIR sections on Conservation and Open Space to reflect AB 52 mitigation measures, especially "Permanent conservation easements or other interests in real property, with cultural appropriate management criteria for the purposes of preserving or utilizing the resources or places"?

The Manzanita Band requests examples of any permanent conservation easements (developed or in development) for the protection of cultural resources or other interests in real property and consultation conducted on culturally appropriate management criteria since the adoption of AB 52.

How will the County identify local registers managed and maintained by Kumeyaay Bands?

The County should address and update the Cultural Resource sections of both plans to include a Kumeyaay Perspective written by the Kumeyaay Nation.

The timeline should address not only the prehistoric Kumeyaay Nation geographical territory but also geopolitical timeline of movement into the Kumeyaay Territory by other Native American Nations.

Old Highway 80 and more recent Interstate 8 should be identified not only as historically significant but also as a Tribal Cultural Resource known and posted as the Kumeyaay Highway, a significant regional prehistoric Kumeyaay trail.

What efforts has the County taken to update the County's Guidelines for Determining Significance for Cultural Resources to identify and minimize adverse impacts to historic and archeological resources to include Tribal Cultural Resources?

The Manzanita Band encourages the County of San Diego to extend consultation to all Kumeyaay Bands rather than only a few and to respectfully use the correct names for the Tribal Nations with whom they do engage for consultation for example:

CEQA Initial Study

Janula Indian Village

Sycuan Band of the Juelyaay Nation

Correct Name

Jamul Indian Village

Sycuan Band of the Kumeyaay Nation

The Manzanita Band looks forward to our consultation and clarification of the above referenced concerns as well as others that will most definitely arise as this process moves forward. Should you have any questions, please contact Lisa Haws, Tribal Administrator, 619-766-4030 (office), 619-733-7697 (cell) or email: lisahaws@msn.com. Thank you.

Sincerely,



Angela Elliott Santos, Tribal Chairwoman
Manzanita Band of the Kumeyaay Nation



County of San Diego

MARK WARDLAW
DIRECTOR

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(858) 694-2962 • Fax (858) 694-2555
www.sdcounty.ca.gov/pds

KATHLEEN A. FLANNERY
ASSISTANT DIRECTOR

ALPINE COMMUNITY PLAN UPDATE SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT

SEPTEMBER 18, 2018 SEIR PUBLIC SCOPING MEETING - COMMENT SHEET

PURSUANT to the meeting, please place a hydrology study at the top of things to complete, water is the key for alpine growth. I have 2 wells on my property and if you want to use the wells as a test for a water study please give me a call 619-368-9128.

There was a great deal of effort by the alpine group to meet with ACP residents and to put a plan in place for the growth of alpine which should be reviewed and be part of your next meeting. Thank you Michael Milligan

Submit by Mail, Fax or Email. Comments must be received no later than October 1, 2018 at 4:00 p.m.

Greg Kazmer, Environmental Coordinator
County of San Diego
Planning and Development Services
5510 Overland Ave., Suite 310
San Diego, CA 92123

Email: gregory.kazmer@sdcounty.ca.gov

FAX: (858) 694-2555

Phone: (858) 505-6857

Michael M Milligan 9/20/18

Commenter Signature, Date

Michael M Milligan

Print Name

1665 STAR VALLEY RD

Address

ALPINE CA 91903

City, State, Zip Code

2018 SEIR Public Comment Meeting Comment Sheet

Parcels affected: <https://arcg.is/1mim9q> - Zone surrounding September 18,

Approximately surrounding areas 19184 Japatul Rd. Alpine, Ca.

10/01/18

Intro:

This area is the heart of the historic Lyster Ranch first established 1880's due to the abundance of water and useable. Descendants are still living here. No environmentally sensitive items are known and the region remains heavily used. Two creeks (Peterson and Taylor) cross the property feeding Loveland Reservoir and the water table is as only -6 feet in the summer trapped behind several natural dikes crossing the valley. This area has historically been marked for development by the city with a lot size of 8 acres.

- 1) This area has abundant water supply*
- 2) Perc tests for septic are excellent
- 3) Regions proposed 40 acres one house forgets there is a high density Mobile Home Park existing
- 4) Region proposed density of 1 home 40 acres does not reflect reality for the area- there are approximately 12 brick and mortar homes within this small area already.
- 5) Alpine Planning recommended to the city during FCI planning that the area was Unique and Suitable for Development- 8 acres- no more than 20. This WAS IGNORED BY THE CITY.
- 6) The city has now proposed this area for 40 Acres 1 home- totally out of character with its current density and ability to support a higher density.

Alpine Planning has told us if we don't speak up there is no chance. I have been left very cynical based on the disregard for Alpine Planning's prior recommendations being completely ignored during FCI planning.

*Forestry service fire trucks stage and refill at my ranch- we refill them in 5 min all day long.

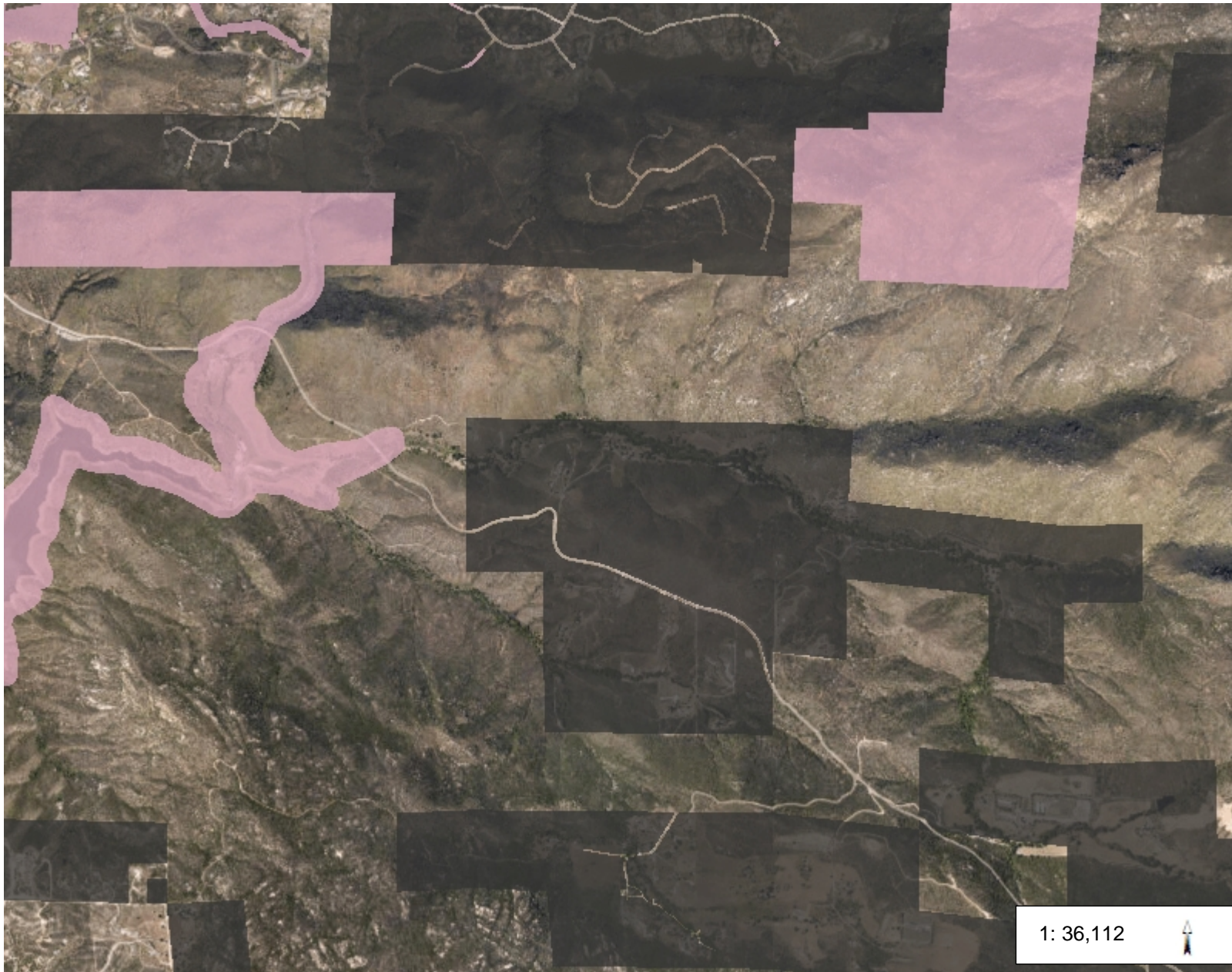
Warner Recabaren
19184 Japatul Rd.
Alpine, Ca. 91901
(619) 683-2637

The screenshot displays the Mapping San Diego web application. At the top, a navigation bar includes buttons for 'Zoom In', 'Zoom Out', 'Pan', 'Previous Extent', 'Next Extent', 'Full Extent', 'Street View', and 'Identify'. Below this bar, the current mouse coordinates are shown: Latitude: 32.799387, Longitude: -116.706768.




The main map area shows an aerial view of a landscape with a grid of land parcels overlaid. A vertical scale bar on the left indicates 500m and 2000ft. An inset map in the bottom right corner shows a larger regional context with a red rectangle highlighting the current map area. The 'innovative MAPPING.COM' logo is visible in the bottom right corner of the map area.

On the right side, there is a sidebar with several sections:

- Map Layers:** A list of layers with checkboxes. 'Parcels' is checked. 'Parks in City of San Diego' is highlighted. Other layers include 'Parks in San Diego County', 'Open Space Easement', 'Developable Land', 'Business Improvement Districts', 'Redevelopment Districts', 'Business Enterprise Zones', 'Historic Districts', 'Agricultural Preserves', 'Land Use', 'Zoning - City of San Diego', 'Zoning - Unincorporated', and 'San Diego Neighborhoods'.
- Planning:** A dropdown menu.
- Streets, Aerial, Topo:** A row of buttons. 'Aerial' is selected and highlighted with a red box.
- ADJUST TRANSPARENCY:** A slider from 0% to 100%.
- Parks in City of San Diego:** A section with a green square icon and the text 'Parks in City of San Diego'. Below it is a 'Show Metadata' button.
- Find Address:** A section with input fields for 'Street:' and 'City: San Diego', and a 'Find Address' button.



Legend

-  Existing Housing Element Inve
-  FCI
-  Environmentally Sensitive Area

1: 36,112



1.1 0 0.57 1.1 Miles

WGS_1984_Web_Mercator_Auxiliary_Sphere
Planning and Development Services

This map is a user generated static output from an Internet mapping site and is for reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable.

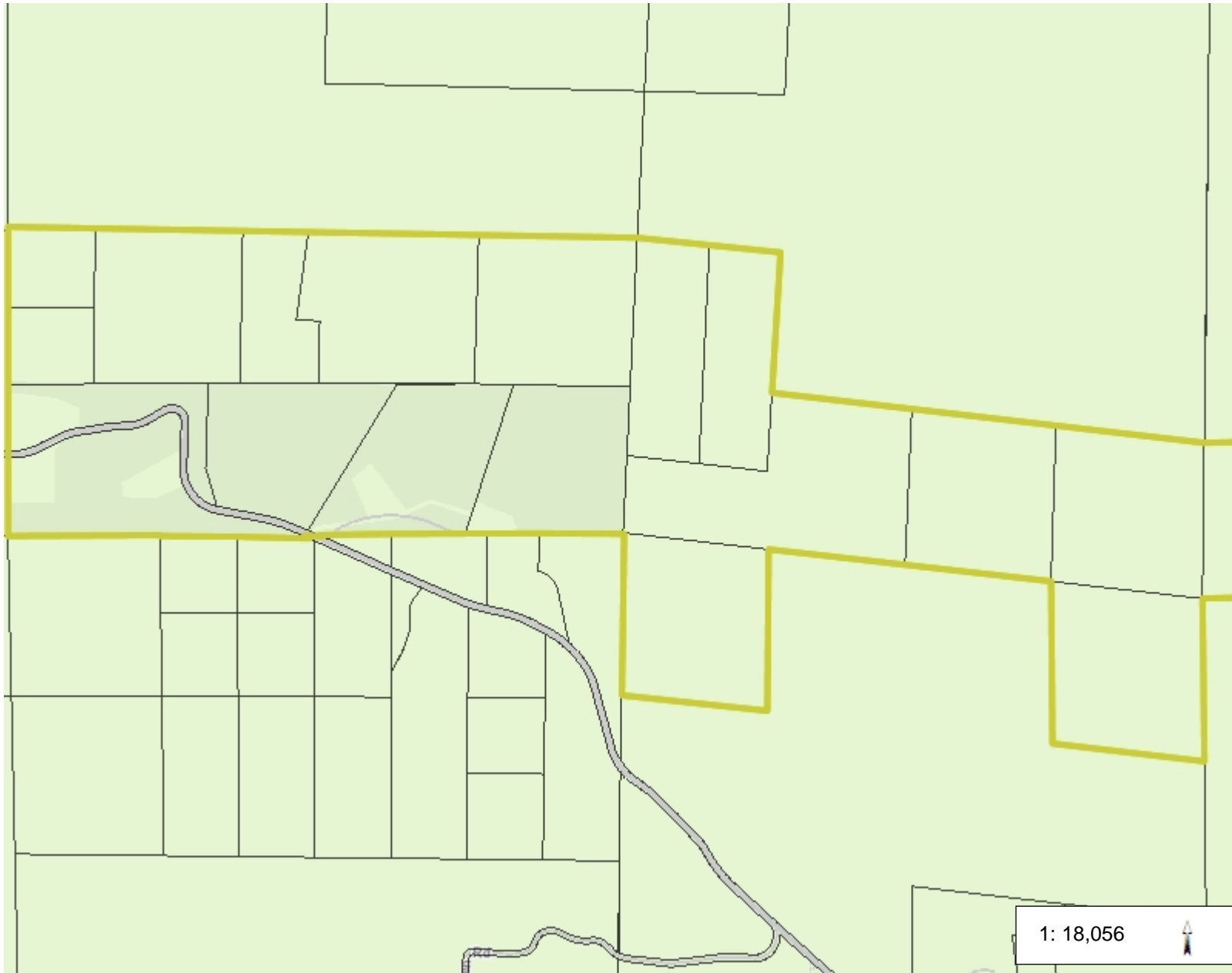
THIS MAP IS NOT TO BE USED FOR NAVIGATION

Notes



Legend

☐ Parcels



0.6 0 0.28 0.6 Miles

WGS_1984_Web_Mercator_Auxiliary_Sphere
Planning and Development Services

This map is a user generated static output from an Internet mapping site and is for reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable.

THIS MAP IS NOT TO BE USED FOR NAVIGATION

Notes

Zoom In Zoom Out Pan Previous Extent Next Extent Full Extent Street View Identify

Current Mouse Coordinates: Latitude: 32.807241 Longitude: -116.727625

Streets Aerial **Topo**

0% ADJUST TRANSPARENCY 100%

Planning

Map Layers

- ☒ Parcels
- ☐ Parks in City of San Diego
- ☐ Parks in San Diego County
- ☐ Open Space Easement
- ☒ Developable Land
- ☐ Business Improvement Districts
- ☐ Redevelopment Districts
- ☐ Business Enterprise Zones
- ☐ Historic Districts
- ☐ Agricultural Preserves
- ☐ Land Use
- ☐ Zoning - City of San Diego
- ☐ Zoning - Unincorporated
- ☐ San Diego Neighborhoods

Developable Land

☒ Developable Land

Show Metadata

Street:

City:

Find Address



County of San Diego

MARK WARDLAW
DIRECTOR

PLANNING & DEVELOPMENT SERVICES
5510 OVERLAND AVENUE, SUITE 310, SAN DIEGO, CA 92123
(858) 694-2962 • Fax (858) 694-2555
www.sdcountry.ca.gov/pds

KATHLEEN A. FLANNERY
ASSISTANT DIRECTOR

ALPINE COMMUNITY PLAN UPDATE SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT

SEPTEMBER 18, 2018 SEIR PUBLIC SCOPING MEETING - COMMENT SHEET

9653 Dunbar lane , Parcel # 402-201-32-00
I would like to see a zoning change &
or a higher density than what the
current plan allows. Due to the Geographic
location & proximity to Los Coches creek
Jr. Hi school, This property offers
a more suitable use for the general
public & residents of Alpine

Submit by Mail, Fax or Email. Comments must be received no later than October 1, 2018 at 4:00 p.m.

Greg Kazmer, Environmental Coordinator
County of San Diego
Planning and Development Services
5510 Overland Ave., Suite 310
San Diego, CA 92123

Email: gregory.kazmer@sdcounty.ca.gov

FAX: (858) 694-2555

Phone: (858) 505-6857

Chuck Salmon

Commenter Signature, Date

Chuck Salmon

Print Name

9653 Dunbar Ln

Address

El Cajon, CA 92021

City, State, Zip Code



401 B Street, Suite 800
San Diego, CA 92101-4231
(619) 699-1900
Fax (619) 699-1905
sandag.org

September 28, 2018

File Number 3300300

Mr. Gregory Kazmer
County of San Diego Planning & Development Services
5510 Overland Avenue, Suite 110
San Diego, CA 92123
Gregory.Kazmer@sdcounty.ca.gov

MEMBER AGENCIES

Cities of
Carlsbad
Chula Vista
Coronado
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Poway
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San Diego County
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Southern California
Tribal Chairmen's Association

Mexico

Dear Mr. Kazmer:

Subject: Alpine Community Plan Update Notice of Preparation

Thank you for the opportunity to comment on the County of San Diego's Alpine Community Plan Update (CPU) Notice of Preparation (NOP). The San Diego Association of Governments (SANDAG) is submitting comments based on the policies included in San Diego Forward: The Regional Plan (2015 Regional Plan). These policies will help provide people with more travel and housing choices, protect the environment, create healthy communities, and stimulate economic growth. SANDAG comments are submitted from a regional perspective, emphasizing the need for better land use and transportation coordination.

Smart Growth

SANDAG supports the goals and objectives in the 2011 County of San Diego General Plan that encourage smart, sustainable growth and reinforce the principles set forth in the 2015 Regional Plan. A key goal of the 2015 Regional Plan is to focus growth in Smart Growth Opportunity Areas (SGOAs). This project overlaps with an SGOA identified on the Smart Growth Concept Map as an Existing/Planned Rural Village (CN-8). The County of San Diego also received a Cycle 4 Smart Growth Incentive Program Planning Grant to enhance implementation and financing tools for the CPU. Development in these areas supports a sustainable and healthy region, a vibrant economy, and an outstanding quality of life for all. Please continue facilitating smart growth with access to planned transit routes and services within the plan area.

Transportation Demand Management

Please consider integrating transportation demand management (TDM) measures into the Alpine CPU and Draft Environmental Impact Report to encourage the use of transportation alternatives. TDM measures could include enhanced bicycle and pedestrian facilities that connect residents to transit and commercial destinations, and bicycle amenities such as secure bicycle parking. Given the community's proximity to Interstate 8, consider encouraging residents to carpool and vanpool to work as a convenient alternative to driving alone. The SANDAG Vanpool Program provides a subsidy of up to

\$400 per month for eligible vans, and SANDAG also offers support for carpooling. More information on these regional TDM programs is available at iCommuteSD.com.

Other Considerations

SANDAG has a number of resources that can be used for additional information or clarification on topics discussed in this letter. These can be found on our website at sandag.org:

- Designing for Smart Growth: Creating Great Places in the San Diego Region
- Planning and Designing for Pedestrians: Model Guidelines for the San Diego Region
- Integrating Transportation Demand Management into the Planning and Development Process
- Parking Strategies for Smart Growth
- Trip Generation for Smart Growth
- SANDAG Regional Parking Management Toolbox
- Riding to 2050: The San Diego Regional Bike Plan

When available, please send any additional environmental documents related to this project to:

Intergovernmental Review
c/o SANDAG
401 B Street, Suite 800
San Diego, CA 92101

We appreciate the opportunity to comment on the Alpine Community Plan Update NOP. If you have any questions, please contact me at (619) 699-1943 or at seth.litchney@sandag.org.

Sincerely,

A handwritten signature in black ink, appearing to read 'Seth Litchney', written over a horizontal line.

SETH LITCHNEY
Senior Regional Planner

SLI/KHE/mmo



San Diego County Archaeological Society, Inc.

Environmental Review Committee

1 October 2018

To: Mr. Greg Kazmer
Department of Planning and Development Services
County of San Diego
5510 Overland Avenue, Suite 310
San Diego, California 92123

Subject: Notice of Preparation of a Draft Environmental Impact Report
Alpine Community Plan Update
Log No. PDS2016-GPA-16-011, PDS2018-ER-18-00-002

Dear Mr. Kazmer :

Thank you for the Notice of Preparation for the subject project, received by this Society last month.

We are pleased to note the inclusion of cultural resources in the list of subject areas to be addressed in the DEIR, and look forward to reviewing it during the upcoming public comment period. To that end, please include us in the distribution of the DEIR, and also provide us with a copy of the cultural resources technical report(s).

SDCAS appreciates being included in the County's environmental review process for this project.

Sincerely,


James W. Royle, Jr., Chairperson
Environmental Review Committee

cc: SDCAS President
File

SOUTHERN INDIAN HEALTH COUNCIL, INC.

4058 Willows Road • Alpine, CA 91901
phone (619) 445-1188 • fax (619) 659-3144
www.SIHC.org

a consortium comprised of seven Federally recognized Tribes

Barona Band of Mission Indians • Campo Band of Mission Indians • Ewiiapaayp Band of Kumeyaay Indians
Jamul Indian Village of California • La Posta Band of Mission Indians
Manzanita Band of the Kumeyaay Nation • Viejas Band of Kumeyaay Indians

September 24, 2018

Via E-mail: Gregory.kazmer@sdcounty.ca.gov

Mr. Greg Kazmer
County of San Diego
Planning & Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

Re: Alpine Community Plan Update; Project No. PDS2016-GPA-16-011;
Env. Review No. PDS2018-ER-18-00-002

Dear Mr. Kazmer:

Representatives from Southern Indian Health Council attended the Alpine Community Plan Update Notice of Preparation hearing on September 18, 2018 at the Alpine Library. The County noticed the meeting as a Scoping meeting pursuant to the California Environmental Quality Act (CEQA), implying that the County had a project defined that it was prepared to move forward with for environmental review. However, this was not the case. County staff, including yourself, conceded at the hearing that there is no project defined for this Community Plan Update and no actual changes to the plan proposed by the County. Multiple questions were asked at the hearing requesting information on what the County was proposing and the County continually stated that they are still working on it and there is no project proposed yet. How can the County begin to do environmental review when there is no project description or project defined?

One of the integral parts of a CEQA process is a cogent, complete and concise project description. Doing a Community Plan Update without defining the activities that you are proposing to undertake is much like presenting a blank piece of property on an application to the County and request environmental review for what you might be doing at some time in the future. This type of vagueness and lack of transparency, illegitimizes the environmental review process and causes confusion among the public. We strongly recommend that rather than begin the environmental process at this point in time, the County wait until a cogent project description and a proposal are developed and provided to the community and then begin scoping the environmental document based on what that activity is proposing. Absent taking this remedial step, the County is precluding the opportunity for the public to be involved in scoping the document in relation to the County's proposal.

Mr. Greg Kazmer
County of San Diego
Planning & Development Services
September 24, 2018
Page 2

Anticipating that the County will not take a step backwards and complete the process in its rightful sequence, we have some additional concerns regarding the scope of environmental review and the scope of analysis for a community plan update in the Alpine area. First and foremost, we request that the County include all members of the public that are affected by the Community Plan Update, not just those within the Community Plan area. By this, I refer to the Southern Indian Health Council leasehold interest off of Willows Road, which is not governed by the Community Plan Update but is certainly affected by the Community Plan Update. Maintaining adequate access and transit facilities and other transportation facilities consistent with the clinic use is an important use within the community which absolutely needs to be included in the Community Plan Update. Moreover, impacts arising from the Community Plan Update that may negatively affect the Southern Indian Health Council clinic also need to be considered in the Community Plan Update. In the review of the initial study and the documentation produced to date, there is no such mention of any potential impacts to the healthcare facilities at Southern Indian Health Council.


Second, the County has gone to great lengths in many locations throughout the County to plan communities and the overall general plan using the region's biological habitat as a backdrop to create some of the structure of the planning activities. However, there are really two different backdrops upon which the County has developed over the past century. One certainly is the biological habitat backdrop, but the other is the indigenous history of the area. The indigenous history of the area, including landscape-based cultural resources, indigenous agricultural areas, and other cultural areas are often only looked at during the last portion of a development, rather than being part of the planning process. We urge the County to reverse this negative trend and ensure that preservation of cultural resources as part of the County's heritage, are part of the initial restructuring of the Community Plan Update. Where cultural resources could not be preserved as part of the process, or are unknown, strict adherence to adequate analysis by the appropriate professional individuals is absolutely key to ensuring that the area's history and heritage are adequately preserved.

Mr. Greg Kazmer
County of San Diego
Planning & Development Services
September 24, 2018
Page 3

Please include our office at the address above on all future notifications regarding the Community Plan Update. Should you have any questions on this matter, please do not hesitate to contact our Executive Director Carolina Manzano at 619-445-1188, ext. 302.

Best regards,

SOUTHERN INDIAN HEALTH COUNCIL, INC.



Gwendolyn Parada
Chairperson

GP/pat

cc: Carolina Manzano, Chief Executive Officer, Southern Indian Health Council, Inc.
Southern Indian Health Council, Inc. Board of Directors
Theodore J. Griswold, Esq., Procopio

From: Allen Stanko
To: [Kazmer, Gregory](#)
Subject: Alpine 2020
Date: Thursday, September 27, 2018 8:16:30 PM

Hello Mr. Kazmer !

I have been an Alpine-area resident for over 30 years. I enjoy the beauty of Alpine as it is. I do NOT want to see much more development. I definitely do NOT want to see any low-income housing and even fewer section 8 housing !! Alpine does not need any more apartments. Alpine is NOT an apartment community. I would not mind million dollar houses on 1 acre or more. Please keep Alpine semi-rural. THANK YOU !

Sincerely,

Allen Stanko



SWEETWATER AUTHORITY

505 GARRETT AVENUE
POST OFFICE BOX 2328
CHULA VISTA, CALIFORNIA 91912-2328
(619) 420-1413
FAX (619) 425-7469
<http://www.sweetwater.org>

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JENNIFER H. SABINE
ASSISTANT GENERAL MANAGER

September 28, 2018

Mr. Gregory Kazmer
Environmental Coordinator
County of San Diego
5510 Overland Avenue, Suite 310
San Diego, CA 92123

Subject: Notice of Preparation, Alpine Community Plan Update
Sweetwater Authority Comments
SWA File: (Gen) Land Use and Environmental

Dear Mr. Kazmer:

Thank you for providing Sweetwater Authority (Authority) with a copy of the Notice of Preparation (NOP) of a Draft Supplemental Environmental Impact Report (SEIR) for the Alpine Community Plan Update (Proposed Project). We understand that the purpose of the NOP is *"to provide interested stakeholders with sufficient information describing the project and the potential environmental effects in order to make a meaningful response as to which environmental issue areas and alternatives to the project should be analyzed within the SEIR."* The Authority has a vested interest in protecting Loveland Reservoir, which is a reservoir located in the Alpine CPA and the upper Sweetwater River watershed that is used as a source for drinking water for approximately 190,000 people. Consequently, the Authority comments on the Proposed Project as a major stakeholder.

The Authority owns and manages Loveland Reservoir and surrounding lands. The Loveland Reservoir property is approximately 3,292 acres, and is located within the boundaries of the Alpine Community Plan Area (CPA) and adjacent to the Cleveland National Forest. Runoff is captured from the 102-square mile upper Sweetwater River watershed, primarily during spring and winter months. When filled to capacity at an elevation of 1,355 feet above mean sea level, the 25,387 acre foot reservoir has a surface area of approximately 450 acres. This runoff is then stored or transferred to Sweetwater Reservoir via the Sweetwater River channel to augment water production for the Authority's service area, which includes National City, western Chula Vista, and the unincorporated community of Bonita. **Forty-five square miles of watershed lands within the Alpine CPA drain into Loveland Reservoir.**

In addition to Loveland Reservoir, the Authority also owns and manages Sweetwater Reservoir. Sweetwater Reservoir is located in the middle Sweetwater River watershed

Mr. Gregory Kazmer

Re: Notice of Preparation, Alpine Community Plan Update – Sweetwater Authority
Comments

September 28, 2018

Page 2 of 6

in Spring Valley, CA. Major facilities located at or adjacent to Sweetwater Reservoir include the Robert A. Perdue Water Treatment Plant (Perdue WTP), Sweetwater Dam, the Sweetwater Reservoir Urban Runoff Diversion System (URDS), and aqueducts owned and operated by the San Diego County Water Authority. While the Sweetwater Reservoir is located downstream of Loveland Reservoir, approximately 4,700 acres of land within the Alpine CPA and the middle Sweetwater River watershed create runoff that, after concentrating in streams, may be discharged and stored at Sweetwater Reservoir.

Both Loveland Reservoir and Sweetwater Reservoir are a vital part of the San Diego region's drinking water supply. The Authority has demonstrated its compromise in protecting the Sweetwater River watershed lands through a series of resolutions and actions. On May 23, 1984, the Authority's Governing Board adopted *Resolution 84-8*, which was later amended on April 27, 1988. In summary, *Resolution 84-8 As Amended* explains how development in the middle Sweetwater River watershed was becoming a threat to water quality in Sweetwater Reservoir. Furthermore, *Resolution 84-8 As Amended* requires that developers and landowners developing lands within a portion of the middle Sweetwater River watershed pay a fee to reimburse a percentage of the cost associated with the construction of the URDS facilities (*the URDS facilities allow for the capture of polluted urban runoff, physical and biological pollutant removal from captured runoff in detention ponds, and full diversion of urban runoff, as needed*). On July 14, 1993, the Authority's Governing Board adopted a second resolution (*Resolution 93-8*) directing Authority staff to pursue means to protect Loveland Reservoir and the middle and upper portions of the Sweetwater River watershed since these watershed lands provide the runoff that is ultimately treated at the Perdue WTP and delivered to thousands of people in the Authority's service area.

ENVIRONMENTAL REVIEW

Authority staff has reviewed the Initial Study / Environmental Checklist (IS), which is posted on the Proposed Project's website. After reviewing the IS, it is clear that the IS was prepared to summarize information presented in the General Plan Update Programmatic EIR and the Forest Conservation Initiative (FCI) SEIR. The IS mentions that many issues are deferred to future technical reports that will inform the SEIR. Similar to the IS, the preliminary draft version of the Alpine Community Plan, dated February 2018 and posted on the County's website, is difficult to review since most of it is strikethrough and has limited language additions (a significant portion of the document is marked "TO BE UPDATED"). Because of this, the Authority will not comment on the adequacy of these documents. Instead, the Authority will focus its comments on issues that the Authority feels need to be addressed during the

Mr. Gregory Kazmer

Re: Notice of Preparation, Alpine Community Plan Update – Sweetwater Authority
Comments

September 28, 2018

Page 3 of 6

preparation of future documents supporting the Proposed Project and the SEIR, and briefly discuss the edits to the preliminary version of the Alpine Community Plan.

INITIAL STUDY

The **Description of the Project** section indicates that the SEIR “will analyze the reasonably foreseeable impacts of the changes to the plan” (e.g. present v. proposed conditions). The Authority believes that a comprehensive Watershed Analysis needs to be prepared that quantifies the environmental impacts resulting from changes in the watershed, mainly those associated with changes in land use, land cover, and pollutant loads. At a minimum, the Watershed Analysis geographic area should encompass the entire Alpine CPA and the watersheds impacted by the Proposed Project, and the drinking water reservoirs downstream of the Alpine CPA, including Loveland Reservoir, Sweetwater Reservoir, and El Capitan Reservoir. The conclusions of the Watershed Analysis could help informed decision makers better understand the magnitude of the impacts that the Proposed Project may have on the San Diego region’s water resources.

The **Description of the Project** section also mentions that a “special development feasibility study is being prepared to analyze several Areas of Consideration.” Furthermore, it states that the feasibility study will include an assessment of infrastructure needs associated with roads, water, sewers, electricity, and fire protection. The Authority requests that future feasibility studies include and prioritize green infrastructure, specifically green stormwater infrastructure. The feasibility study stage is a good opportunity for investigating alternative infrastructure and best available technologies that could minimize impacts to the drinking water reservoirs.

In the **Geology and Soils** discussion, the IS concluded that erosion would not be an issue since projects or activities associated with erosion or loss of topsoil would comply with existing regulations and thus no mitigation measures are warranted. Erosion issues may be less than significant at the project specific level. When multiple projects are occurring in the same watershed, however, substantial erosion can result from human activities, regardless of compliance with existing regulatory requirements. The Authority, as the owner and operator of two reservoirs that are subject to siltation, believes that due to the cumulative nature of the Proposed Project the topic of Geology and Soils should be further analyzed and discussed in the SEIR. The Watershed Analysis referenced above can be used to model and quantify potential changes in erosion and deposition rates that could occur throughout the impacted watersheds. Furthermore, the SEIR should include mitigation measures that would help minimize siltation issues at Loveland Reservoir. The Authority is willing and able to work with the County of San

Mr. Gregory Kazmer

Re: Notice of Preparation, Alpine Community Plan Update – Sweetwater Authority
Comments

September 28, 2018

Page 4 of 6

Diego (County) to assist with the preparation of acceptable mitigation measures addressing this cumulative issue.

In addition to providing valuable habitat for a variety of sensitive species, riparian habitats provide free ecosystem services, including filtration of contaminated runoff. The Sweetwater River and its tributaries are considered an asset to the Authority since they remove pollutants that otherwise would be discharged to its drinking water reservoirs. The Proposed Project, as described in the **Biological Resources** section, could impact approximately 454 acres of riparian habitat. As these riparian habitats are impacted, not only are the habitats lost or deteriorated, but so are the ecosystem services provided by these habitats. Impacts to riparian habitats and wetlands should be carefully analyzed as an impact to both Biological Resources and to **Hydrology/Water Quality** as this impact could ultimately result in substantial degradation of water quality. The Authority is willing and able to work with the County to assist with the preparation of acceptable mitigation measures that could help reduce the water quality impacts due to the impacts to riparian habitats and wetlands and the ecosystem services they provide to local water resources, including Loveland Reservoir and other downstream reservoirs.

Increasing human activity in the Alpine CPA would likely result in an increase of chemical spills, fires, wildfires, and other activities that are detrimental, directly or indirectly, to the water quality of Loveland Reservoir and other reservoirs. The SEIR should discuss impacts resulting from any possible contaminating activities occurring in the Alpine CPA, not only in the context of their potential impacts to near residences and businesses, but also in the context of their potential impacts to water resources and public services, including stored water in reservoirs and the treatment of such water.

Loveland Reservoir and El Capitan Reservoir are the largest water bodies located within the Alpine CPA and are major drinking water supplies for the region. The IS does mention that there are multiple bodies of water listed in the Clean Water Section 303(d) and that further discussion would be required in the SEIR. Water resources in our region are a finite commodity, and any impact to drinking water reservoirs should be properly analyzed and thoughtfully considered. The potential for contamination of these drinking water sources may result in decreased quality of the resource and the cost of treating such water can increase. The Watershed Analysis or a similar analysis could help identify major concerns resulting from the Proposed Project. Furthermore, infrastructure alternatives should also be discussed in the SEIR in order to protect the downstream drinking water reservoirs.

Mr. Gregory Kazmer

Re: Notice of Preparation, Alpine Community Plan Update – Sweetwater Authority
Comments

September 28, 2018

Page 5 of 6

ALPINE COMMUNITY PLAN

The Public Facilities and Services Water Findings section mentions that *“intensification of land uses may have a negative impact on water service and availability”*. This sentence should be revised to *“intensification of land uses has a negative impact on water service and availability to the Alpine community and other communities downstream.”*

The Public Facilities and Services Sewer Findings section could have a recommendation that discourages the use of septic systems and promotes the annexation of existing and new developed areas to a sanitation district.

The Recreation Policy and Recommendation No. 4 mentions coordination *“with water district to maximize recreational activities such as hiking and fishing at El Capitan and Loveland Reservoirs.”* In a similar manner, the Authority, owner and operator of Loveland Reservoir, would like to see language either in the Conservation Section or any other applicable section of the Plan regarding coordination with water districts to maximize pollution prevention in the surface water reservoirs.

Conservation Goal No. 2 includes new language about water quality benefits resulting from tree planting. The Conservation section could also encourage the adoption of green stormwater infrastructure for all new developments, where feasible, to help mitigate impacts to water quality.

The Plan should have a finding recognizing that any approval of new industrial, agricultural, and commercial activity or facility could impact the reservoirs located downstream, which are used by the community for recreational activities such as fishing and hiking, and are also a vital water resource for the San Diego region.

CONCLUSION

The Authority has concerns regarding impacts to water quality that could result from the Proposed Project. In the past, the Authority worked in concert with the County and has been able to mitigate, to an extent, impacts to water quality in Sweetwater Reservoir by constructing the URDS facilities along the north side of the Sweetwater Reservoir. The Authority believes that, before approving the Proposed Project or the SEIR, the County should work together with the impacted water agencies on the issues mentioned above to ensure that impacts to water resources can be minimized. If you have any questions or concerns, please do not hesitate to contact our Environmental Project Manager, Israel Marquez at imarquez@sweetwater.org or (619) 409-6759 or Engineering Manager, Erick Del Bosque at edelbosque@sweetwater.org or (619) 409-6752.

Mr. Gregory Kazmer
Re: Notice of Preparation, Alpine Community Plan Update – Sweetwater Authority
Comments
September 28, 2018
Page 6 of 6

Sincerely,

SWEETWATER AUTHORITY

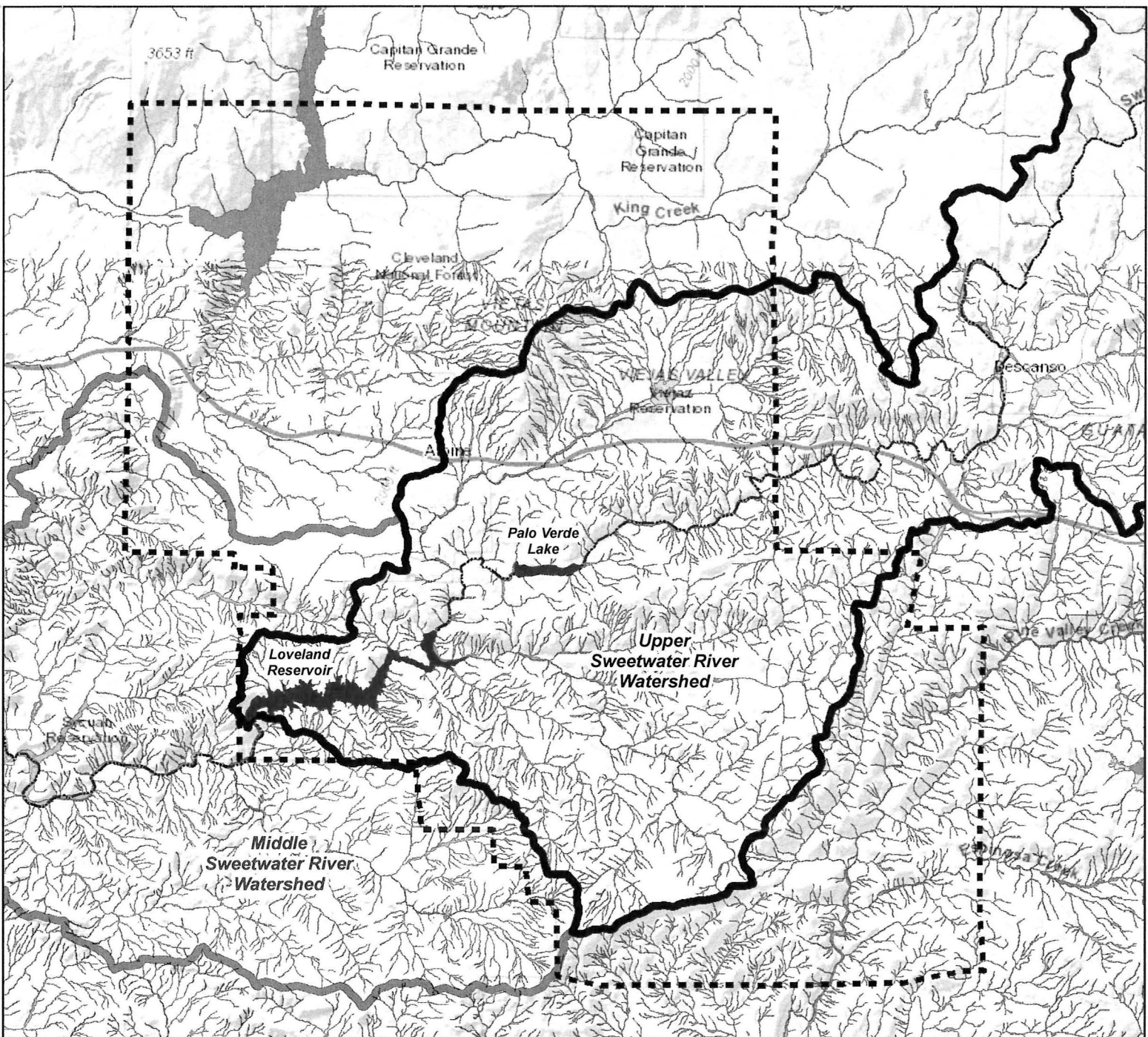


Ron R. Mosher
Director of Engineering

RRM:IM:vn

Enclosures: Exhibit A, Alpine Community Plan Area
Exhibit B, Resolution Establishing Policy Regarding Urban Runoff
Protection
Exhibit C, Resolution Directing Sweetwater Authority Staff to Pursue
Means to Protect Loveland Reservoir and Watershed

cc: Tish Berge, Sweetwater Authority
Jennifer Sabine, Sweetwater Authority
Pete Baranov, Sweetwater Authority
Erick Del Bosque, Sweetwater Authority
Israel Marquez, Sweetwater Authority
Cindy Pino, Sweetwater Authority
Tim Bombardier, San Diego County Water Authority
Lan Wiborg, City of San Diego Public Utilities Department (via email)
Albert C. Lau, Padre Dam Municipal Water District (via email)



Alpine Community Plan Area

-  Alpine Community Plan Area
-  Upper Sweetwater River Watershed Boundary
-  Middle Sweetwater River Watershed Boundary
-  National Wetlands Inventory
-  Sweetwater River
-  Reservoir/Lake

28,924 acres of the Alpine Community Plan Area are within the Upper Sweetwater River Watershed Boundary.

4,689 acres of the Alpine Community Plan Area are within the Middle Sweetwater River Watershed Boundary.

This map was developed by Sweetwater Authority for internal illustration only. It is not designed to provide technical detail, and should not be used for any other purpose without the express written permission of Sweetwater Authority.
Sweetwater Authority - www.sweetwater.org
505 Garrett Avenue
Chula Vista, CA 91910
(619) 420-1413; Fax: (619) 425-7469



This map may contain certain GIS data derived from SanGIS (San Diego Geographic Information Source) and San Diego Association of Governments (SANDAG) regional information system downloadable data. SanGIS/SANDAG disclaims any responsibility for the accuracy or correctness of this data.
SanGIS - www.sangis.org
5510 Overland Avenue, Suite 230
San Diego, CA 92123



RESOLUTION NO. 84-8 AS AMENDED

RESOLUTION OF THE GOVERNING BOARD OF SWEETWATER AUTHORITY
ESTABLISHING ITS POLICY REGARDING URBAN RUNOFF
PROTECTION FOR THE SWEETWATER RESERVOIR

WHEREAS, soon after the South Bay Irrigation District acquired and Sweetwater Authority took over operation of the water system, including the Sweetwater Reservoir, The California Department of Health Services advised the Authority that long-range planning to prevent degradation of water quality in the Sweetwater Reservoir caused by urbanization of the watershed should be implemented immediately; and

WHEREAS, the Authority commenced said planning in 1978 and has obtained as a condition on all subdivision maps, specific plans and certain other projects requiring discretionary or other approvals prior to development within the watershed, a requirement that the applicant satisfy the Authority with respect to protection of the Sweetwater Reservoir from urban runoff to mitigate the impact of its development; and

WHEREAS, the Authority has required one developer to construct a facility to mitigate adverse impacts of its development; and

WHEREAS, pursuant to an agreement with Rancho San Diego, the Authority retained the engineering firm of Luke-Dudek to conduct an Urban Runoff Study to present the alternatives

for runoff facilities to mitigate the adverse affects from the urban development within the watershed and then conduct a Design Study of the alternative selected by the Authority; and

WHEREAS, Luke-Dudek submitted a comprehensive Urban Runoff Study to the Authority which attempted to predict the impact on the Sweetwater Reservoir from urban and other development or land use in its watershed and listed several alternatives for mitigating said impact; and

WHEREAS, the Authority received said study and, after consideration, on October 28, 1981, selected an alternative and authorized Luke-Dudek to proceed with a Preliminary Design Study on said alternative; and

WHEREAS, on September 16, 1982, Luke-Dudek submitted its "Design Study, Urban Runoff Control Facilities, Sweetwater Reservoir" containing its preliminary design plans for the alternative facility selected by the Authority; and

WHEREAS, the Authority has received the report and studied the report but has not yet formalized plans for such a facility; and

WHEREAS, the Authority has diligently analyzed the preliminary plans, the cost of such facility, the methods of financing such a facility, the potential development and land use in the watershed and the ownership of land within the watershed; and

WHEREAS, the Authority continues to study the facility and the methods to finance this facility; and

WHEREAS, the Authority has estimated that the cost of the facility which is currently recommended by the staff is approximately \$9.1 million; and

WHEREAS, the Authority has determined that approximately thirty percent of the area to be developed in the watershed has been developed or is devoted to uses which adversely impact Sweetwater Reservoir; and

WHEREAS, the Authority proposes to pay an amount equal to \$3 million to cover the cost of its proposed urban runoff facility which is an amount equal to the share imposed by existing developments and land uses and to recover the remaining costs from new developments and land uses within the watershed.

NOW, THEREFORE, IT IS HEREBY RESOLVED by the Governing Board of the Sweetwater Authority as follows:

1. The Authority has formally received the Design Study prepared by Luke-Dudek, Civil Engineers, dated September 1, 1982.

2. The Authority has tentatively determined to reduce the scope of the facility contained in said Design Study.

3. The Authority estimates that the cost of the facility including capitalized operation and maintenance will be approximately \$9.1 million.

4. The Authority, in an effort to inform developers and landowners within the watershed of their potential obligations as tentatively determined, estimates that it must obtain \$5.7 million toward the cost of the facility from developments and land uses within the watershed as

described in the Design Study.

5. The Authority estimates that to obtain said funds it will require the payment by developments and land uses in the watershed of approximately \$300 per dwelling unit or equivalent dwelling unit as adjusted for inflation.

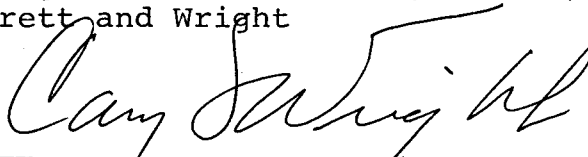
6. The Authority, in accordance with this estimate and in an effort to obtain said funds, will enter into agreements with developers and landowners requiring the payment of \$300 per unit as adjusted for inflation in paragraph 7 below. In the event that any land called for in a development or other land use is to be developed for commercial, industrial or other uses which adversely impact Sweetwater Reservoir, transitory residential uses, including motels and hotels, the fee shall be as follows: one acre of said development or land use including all areas occupied by parking buildings, golf courses, playgrounds, recreation fields, commercial equestrian operations, or other improved open space, landscaping and driveways but not the area of any road or street dedications or irrevocable offers to dedicate shall constitute 2.9 equivalent dwelling units. The developer shall pay \$300 as adjusted in paragraph 7 per equivalent dwelling unit.

7. Each of the cash payments referred to in paragraph 6 above, shall be increased by the same percentage as any increase in the Construction Cost Index for Los Angeles published by the Engineering News Record which occurs between

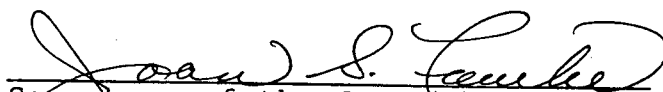
April 1, 1984 and the date of such cash payment agreed to between the developer and the Authority. In the event the aforementioned Index ceases to be published, or is materially modified, the Authority shall select a replacement index with similar construction costs parameters.

PASSED AND ADOPTED at a meeting of the Governing Board of the Sweetwater Authority held April 27, 1988, by the following vote:

AYES:	Directors Pocklington, Waters, Welsh, Steele, Smith,
NOES:	None Jarrett and Wright
ABSENT:	None


Chairman of the Governing Board

ATTEST:


Secretary of the Governing Board

RESOLUTION NO. 93-8**RESOLUTION OF THE GOVERNING BOARD
OF SWEETWATER AUTHORITY
DIRECTING STAFF TO PURSUE MEANS TO PROTECT
LOVELAND RESERVOIR AND THE LOVELAND WATERSHED**

WHEREAS, Sweetwater Authority began its efforts to protect the water quality of Sweetwater Reservoir in 1978, and

WHEREAS, the Board of Supervisors of the County of San Diego, pursuant to its policy A-106 Section II.X, uses its powers to protect quality of local waters, and

WHEREAS, the Board of Supervisors of the County of San Diego has provided for the collection of fees from new developments to be used to mitigate the impacts of development on water quality in a portion of the Sweetwater Reservoir watershed (herein referred to as Middle Sweetwater River), and

WHEREAS, the Governing Board of the Sweetwater Authority has set forth its fees for runoff protection in its Resolutions 84-8 and 88-5, and

WHEREAS, those efforts resulted in the design and construction of a Sweetwater Reservoir Urban Runoff Diversion System, and

WHEREAS, the remaining portion of the Middle Sweetwater River watershed and the watershed of Loveland Reservoir are now undergoing subdivision and development activity which will cumulatively affect the quality of waters tributary to, and stored in, Sweetwater and Loveland Reservoirs, and

WHEREAS, the Governing Board of Sweetwater Authority wishes to minimize the effects of development on water quality in the Loveland Reservoir and watershed,

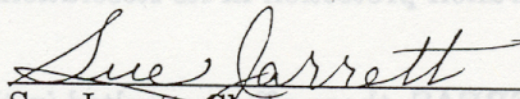
NOW, THEREFORE, BE IT RESOLVED that the Governing Board of Sweetwater Authority hereby directs staff to review development activities in the entire watershed of the Sweetwater River and to comment to agencies which have planning jurisdiction within the watershed with regard to impacts and potential impacts on water quality as a result and to continue to develop the science required to identify those impacts on water quality.

PASSED AND ADOPTED at a regular meeting of the Governing Board of Sweetwater Authority held on the 14th day of July, 1993, by the following vote to wit:

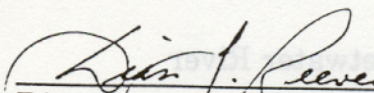
AYES: Directors Jarrett, Pocklington, Steele, Waters, Welsh, Wolniewicz & Wright

NOES: None

ABSENT: None


Sue Jarrett, Chairman

Attest:


Dian J. Reeves, Secretary

From: [Larry Tucker](#)
To: [Kazmer, Gregory](#)
Subject: Alpine Community Plan Update
Date: Tuesday, September 04, 2018 5:27:17 PM
Attachments: [Site Plan 030312 Updated for McDonald"s.pdf](#)

Dear Mr. Kazmer,

Many years ago I processed a site plan for the Albertson's Center in Alpine through the Alpine Community Planning Group, Alpine Design Review Board and the County Planning Commission. Our project was appealed to the County Board where it was also approved, but of course we were sued under CEQA even though the land was general planned and zoned for commercial use (we only needed site plan approval). We won the lawsuit and the project got built in 2008. I still own the Starbucks building and the land under the Wells Fargo Bank. I still operate the common area of the shopping center.

Our zoning for the shopping center requires that 20% of land for the Center had to remain open (it may have been 25%, I can't recall and my files are in storage). The topography of the property was such that it was easiest to put all of the open area in one location - - behind (south of) the Albertson's. The neighbors were happy with the buffer and it was fine with us too. Members of the ACPG wanted to have the land as a park which we were happy to dedicate for free. However, after they worked on the project for a couple of years, the sheriff complained that there was no access to patrol this passive park and the park project was abandoned.

Now the Center has approximately 2.1 acres of open area surrounded by houses and Albertson's. With the fire situation in Alpine, every few years having an open area in that locations doesn't look like it was that great of an idea. The area did not catch fire earlier this summer, but it had to have been close. We would still be willing to dedicate the land to the County for a park, but if the County still does not want that use, we would like to be able to develop the land for housing. So I would like to see the community plan update EIR analyze the open area for a park and for housing. Given that we have not participated in the community plan update to this point, that may well be difficult, but the project description seems to contemplate the possibility of land use designation changes.

I understand Joe Farace is no longer with the County, but I believe Ken Brazell and Ed Sinsay are still there so they can tell you about our adventure in getting the Albertson center built. If the land use of the open area were to be changed, that would also require the land use and zoning to be changed for the center to be changed to no longer require such a large portion of the land to be open area. I am going from memory on this, but I can get the technical details in focus if need be.

I know this is a lot to drop on you, but I would appreciate a call so we can discuss a bit more. As a lawyer turned real estate developer with 11 years' experience on the Newport Beach Planning Commission, I will be able to quickly grasp any issues of which you think I should be made aware. This small of a project is probably not worth fooling with if I can't attach the CEQA aspects (at least at a programmatic level) to a larger endeavor. And I won't bother if most of the neighbors do not see the wisdom of removing native vegetation from next to their houses, even though their fire insurance carriers might be all for the idea!

I look forward to hearing from you.

Very truly yours,

Larry Tucker
(949) 706-3227

From: [Mercedes Wheeler](#)
To: [Kazmer, Gregory](#)
Subject: Alpine Community Plan
Date: Friday, August 31, 2018 11:04:35 AM
Attachments: [image004.png](#)

Would it be possible for you to e-mail me a copy of the Alpine Community Plan.

Thank you.

Mercedes Wheeler



Mercedes Z. Wheeler, Esq.

HORTON, KNOX, CARTER & FOOTE, LLP

195 South 2nd Street

P.O. Box 1439

Brawley, CA 92227

Tel (760) 344-2360

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Email mwheeler@hkcf-law.com

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