

From: [Lila Werland](#)
To: [FGG, Public Comment](#)
Subject: [External] RESOLUTION TO SET ASIDE THE CERTIFICATION OF THE ENVIRONMENTAL IMPACT REPORT AND RESCIND ALL PROJECT APPROVALS FOR THE ALPINE COMMUNITY PARK PROJECT AND RELATED CEQA DETERMINATION
Date: Monday, April 20, 2026 4:51:19 PM

Dear San Diego County Board of Supervisors,

My name is Lila Werland and I am a resident of Alpine, CA. I am writing to formally support the resolution to set aside the certification of the Environmental Impact Report and rescind all project approvals for the Alpine Community Park Project and related CEQA determination. This is pertaining to Agenda Item #8 for the Land Use hearing for the San Diego County Board of Supervisors on April 22, 2026.

As a resident of Alpine, I support setting aside the certification because the Draft EIR does not comply with the California Environmental Quality Act, as it lacks sufficient analysis, relies on vague mitigation, and prevents informed decision-making. As a student studying Environmental Studies with a focus on Policy at the University of Santa Barbara, CA, I am well versed in the process of EIR and compliance under CEQA, NEPA, and the ESA. I read the draft EIR and completely agree with the non-profit and community groups that exposed the report for being legally inadequate, lacking in evidence, and completely disregarding several major issues that could potentially affect the park.

I was raised in a neighborhood across the street from Wright's Field. I have grown up hiking and playing in the field ever since I was a kid. Advocating for areas like Wright's field was what made me want to pursue a degree in Environmental Advocacy in the first place. That being said, this park has been in the works and proposed for well over a decade. Over this decade, community members have been extremely vocal about why this park would not be good for the community. First, there are no walkable or bikeable lanes to and from this park. The park is only accessible through walking beside an extremely unsafe street (on the side of a 40 mph street) or driving. In addition, the parking is not free and will therefore pile up cars in the adjacent neighborhoods like mine. This does not help the whole community. This park will be only accessible to those who can drive there or who have parents that can drive there. That being said, the EIR being so insufficient is yet another example of how this planning committee is failing to listen to the community members and understand or analyze the potential affects.

Ways that the EIR was insufficient:

Sensitive species and habitat:

Alpine Park will result in severe impacts to sensitive species and habitat. The project site contains rare and sensitive biological resources, including the Quino checkerspot butterfly (endangered), Western spadefoot toad, Pallid bat, and many rare native plant communities.

In addition to the existence of rare species, the Quino checkerspot butterfly is on the endangered species list, and the only proposed solution to maintaining this critical habitat in the draft EIR was to move their plants and habitat areas. This is not a sufficient way to maintain critical habitat in compliance with the Endangered Species Act, which is just one of the many examples of the EIR not adequately representing the environmental impacts that this project will have.

Wildfire Risk and Safety Concerns:

This site is near Cleveland National Forest and surrounded by vegetation prone to fire. Alpine itself is an area prone to fire, and in 2021, the Alpine Fire Protection District reported 1800 emergency calls concerning wildland fires, structure fires, vehicle fires, etc. In 2018 a fire burned near and into Wright's field, devastating habitats and homes near it. The draft EIR for the proposed park did not adequately analyze wildfire impacts or mitigation. In fact, the proposed "wildfire safety" was to move the park 20 feet from the road (in addition to another 40 feet of concrete already in the project). Alpine is not a low risk environment, and any EIR that fails to fully analyze wildfire risk is ignoring a well-documented, recurring hazard.

Deficiencies in biological analysis and CEQA compliance

The problems with the Draft EIR were not just raised by outside or community groups, they were serious enough that the County itself had to partially recirculate the document, which is a major issue under CEQA. Under the California Environmental Quality Act, recirculation is required when new significant information is added or when the original analysis is found to be inadequate. This means that the initial Draft EIR failed to provide sufficient detail for meaningful public review.

There were several deficiencies for the EIR in the biological analysis, as the EIR did not establish accurate, up-to-date baseline conditions for sensitive species and habitats. CEQA requires a clear understanding of existing conditions *before* impacts can be evaluated. There were additional concerns for the surveys of rare, threatened, or endangered species, which were limited in scope, not conducted across appropriate seasons, and potentially missing analysis of other species that weren't examined in the EIR. Without the proper surveys, the EIR cannot reliably conclude that the impacts are "less than significant"

Generalized assumptions

The EIR document relied too heavily on generalized assumptions rather than detailed, location specific data about habitat quality, species distribution, and ecological interactions. Many of their proposed solutions to these issues were to simply "move" species. There was also no adequate explanation of how the project would affect biological resources. It is necessary that an EIR analyze the effects of biological resources from habitat fragmentation, edge effects, or human disturbance as much as their potential solutions.

Thank you for considering my comment. I respectfully request that my concerns be entered

into the official record and that the San Diego County Board of Supervisors set aside the certification of the Environmental Impact Report and rescind all project approvals for Alpine Community Park Project.

Sincerely,

Lila Werland



Alpine, CA

Student at the University of California, Santa Barbara