

	Soccer (Fields not used during lacrosse season) <ul style="list-style-type: none"> • One "upper" regulation U12 soccer field. Condition: Poor • One "lower" regulation U10 soccer field. Condition: Fair Softball (Per Alpine Girls Softball website, field is closed) <ul style="list-style-type: none"> • Two softball fields with back stops, dugouts and bleachers. Condition: Poor • Batting cage. Condition: Poor
Other amenities and conditions	<ul style="list-style-type: none"> • Gravel track circling the "lower" field. Condition: Poor
Organization(s) known to use facilities	Alpine Youth Soccer Organization www.alpineayso.org/region295 Alpine Eagles Lacrosse https://www.alpineeagleslax.com

Old Ironsides County Park 3.6 total acres	
Owner	San Diego County Department of Parks and Recreation https://www.sdparcs.org/content/sdparcs/en/park-pages/OldIronsides.html
Google maps	https://www.google.com/maps/place/Old+Ironsides+County+Park,+El+Cajon,+CA+92019/@32.8218489,-116.8298151,601m/data=!3m1!1e3!4m5!3m4!1s0x80d95e38ddb32001:0xc09f8cc6d5fea113!8m2!3d32.8227154!4d-116.8271627
Fields/Courts and conditions	Basketball <ul style="list-style-type: none"> • One half court. Condition: Good
Other amenities and conditions	<ul style="list-style-type: none"> • Two playground areas with multiple play structures, one exercise course, seven picnic tables, horseshoe pit, small gazebo. Condition: Good to Fair, depending on amenity • Community Center, restrooms and large outdoor covered meeting area. Condition: Unknown
Organization(s) known to use facilities	Unknown

Rios Baseball Park 9.88 total acres	
Owner	Appears to be San Diego County Department of Parks and Recreation.
	While Rios Baseball Park is not listed on the County Parks and Rec (DPR) website as a park, a notice posted at the facility states, "The County of San Diego Department of Parks and Recreation is reopening park amenities in sync with public health orders." An additional 3-page form (with a date of completion of 12/4/20 and naming a contact person who, as of July 22, is an employee of DPR) details the Safe Reopening Plans for the facility. https://www.rioscanyonll.com

Google maps	https://www.google.com/maps/place/Rios+Canyon+Little+League+fields/@32.8571424,-116.8604813,323m/data=!3m1!1e3!4m5!3m4!1s0x80d95f6f71a4595b:0x61e89e0844eectf518m2!3d32.857099614d-116.8592226
Fields/Courts and conditions	Baseball <ul style="list-style-type: none"> • Four baseball fields with backstops, dugouts and bleachers. Condition: Good – Fair depending on the amenity • Two additional baseball fields. Condition: Poor
Other amenities and conditions	<ul style="list-style-type: none"> • Snack bar. Condition: Good • Restrooms. Condition: Unknown • Bunting cage. Condition: Good • Picnic tables and playground with play structure. Condition: Good
Organization(s) known to use facilities	Rios Canyon Little League https://www.rioscanyonll.com

Shadow Hills Elementary School/Creekside Early Learning Center	
7.76 total acres (3.94 acres of fields and 0.6 acres of asphalt at SHES, and 2.2 acres of fields and 1.02 acres of asphalt at CELC,)	
Owner	Alpine Union School District https://www.alpineschools.net
Google Maps view	https://www.google.com/maps/place/Creekside+Early+Learning+Center/@32.8326704,-116.8174808,373m/data=!3m1!1e3!4m5!3m4!1s0x80d95e340c6b36fb:0xbddb0006f5c0dc81c!8m2!3d32.833772514d-116.8154235
Note(s)	Alpine American Little League and Alpine American Youth Soccer Organization partnered at the end of 2020 to complete significant upgrades to the grass fields behind both schools, including overhauling irrigation, laser leveling the fields, spreading topsoil with seeds for grass and adding new dirt for baseball infields. They each use the facilities during their respective seasons. Alpine Unified School District contributed by fixing a drainage issue on Creekside fields to help with runoff during the rainy season.
Fields/Courts and conditions	Baseball (Fields not used during soccer season) <ul style="list-style-type: none"> • Two full-size baseball fields with backstops, dugouts and bleachers behind Shadow Hills. Condition: Good • Two smaller baseball fields with backstops, dugouts and bleachers behind Shadow Hills. Condition: Fair for fields, backstops and dugouts; Poor for bleachers. • Two full-size baseball fields with backstops, dugouts, and bleachers behind Creekside. Condition: Good Soccer (Fields not used during baseball season) <ul style="list-style-type: none"> • Two soccer fields (One U12 and one U10) behind Shadow Hills. For practices, several teams use one field. Condition: Good • One U19 soccer field or two - three fields for younger children behind Creekside. Condition: Good Basketball <ul style="list-style-type: none"> • Two basketball courts at Shadow Hills. Condition: Fair • Two slightly smaller basketball courts (one with lower baskets) at Creekside. Condition: Fair
Other amenities and conditions	<ul style="list-style-type: none"> • Snack bar with an announcer's booth. Condition: Fair • Restrooms. Condition: Unknown • Bunting cage. Condition: Good • Playground (behind Creekside). Condition: Good
Organization(s)	Alpine American Little League

known to use facilities	www.alpineamericanlittleleague.com Alpine Youth Soccer Organization www.alpineayso.org/region295
-------------------------	--

<p style="text-align: center;">Van Buskirk Field 1323 Administration Way, Alpine, CA 91901 0.88 total acres</p>	
Owner	Alpine Union School District https://www.alpineschools.net
Google maps	https://www.google.com/maps/place/Administration+Way,+Alpine,+CA+91901/@32.8364246,-116.7748212,186m/data=!3m1!1e3!4m5!3m4!1s0x80d9608d6fd3c775:0xfe226b8b63ec7a24!8m2!3d32.8363688!4d-116.7752698
Fields/Courts and conditions	Softball (Per Alpine Girls Softball website, field is closed) <ul style="list-style-type: none"> One softball field with backstop, dugouts and bleachers used for practice. Condition: Poor
Other amenities	Unknown
Organization(s) known to use facilities	In the past, Alpine Girls Softball (includes girls from all of East County and many games are played in El Cajon and Lakeside) used the field. www.alpinesoftball.com

Exhibit F

Exhibit G



County of San Diego

ERIC GIBSON
DIRECTOR

DEPARTMENT OF PLANNING AND LAND USE

5201 RUFFIN ROAD, SUITE B, SAN DIEGO, CALIFORNIA 92123-1666
INFORMATION (858) 694-2960
TOLL FREE (800) 411-0017

February 20, 2009

Jim Harry
ICF Jones & Stokes
9775 Businesspark Avenue, Suite 200
San Diego, CA 92131

**COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE
GROSSMONT UNION HIGH SCHOOL DISTRICT'S HIGH SCHOOL NO. 12**

The County of San Diego has received and reviewed the Draft Environmental Impact Report (DEIR) dated January 6, 2009 for the Grossmont Union High School District's proposed High School No. 12 in the unincorporated community of Alpine. In response to the DEIR the County, as a responsible agency under CEQA Section 15381, has comments that identify environmental issues that may have an affect on the unincorporated lands of San Diego County. County Department of Planning and Land Use (DPLU), Department of Public Works (DPW) Transportation Division, and Department of Parks and Recreation (DPR) offer the following comments regarding the content of the document:

GENERAL

The document is well written and does a good job of identifying the issues and environmental impacts on the three potential sites for the new high school. We appreciate the thoroughness of the document in analyzing all three locations at the same level of review. Due to the significant and not mitigable impacts to biological resources for Alternative B (Wright's Field) and the direct implications to the County's Multiple Species Conservation Plan, the County cannot recommend that this site be

chosen for such an intensive land use. However, the other two sites appear to be viable options for consideration.

BIOLOGY

1. Study Area B is located within the County's Wright's Field Pre-Approved Mitigation Area (PAMA) and adjacent to Wright's Field Preserve, an integral part of the County of San Diego's South County Multiple Species Conservation Program (MSCP) Subarea Plan. To date, the County, in partnership with the Back Country Land Trust (BCLT), has acquired 252 acres for open space within the Wright's Field Preserve, owned and managed by the BCLT. The County contributed approximately \$1.4 million toward this open space preservation. Loss of this much grassland habitat would impact the overall function and viability of the grassland including the lands that have already been set aside as preserve with significant expense to the County and community. A significant amount of native grassland, such as at Wright's Field, is a very rare habitat in San Diego County and any impacts to it would be considered significant. Since Wright's Field is one of only approximately three remaining areas of significant amounts of intact native grassland in San Diego County, we agree with the significant and not mitigable finding in the DEIR since in-kind mitigation is probably not be feasible.
2. It is agreed that Alternative B would result in a direct and cumulative conflict with the San Diego County MSCP Subarea Plan and would remain significant with implementation of the measures identified in the EIR. Any loss of native grassland habitat will impact the overall function and viability of the grassland including the lands that have already been preserved with significant expense to the County and community. Additionally, indirect effects associated with lighting, noise, invasive plants from landscaping, and ground moisture changes from irrigation runoff and impervious surfaces would also negatively affect the surrounding natural and preserved areas. From a biological and regional planning perspective Alternative B remains the least preferable of the three alternative sites.
3. Executive summary -The acreage of impacts to native grasslands associated with Alternative B is inconsistently stated at Summary of Impacts, Biological Resources (8.23 acres) and Significant Residual Impacts (27 acres) and Table S-1 MM BIO B.1.b (29 acres).
4. Executive summary - Please correct references to the San Diego County MSCP Subarea Plan instead of the MSCP and San Diego County Subarea Plan in the executive summary and elsewhere in the document.

5. The County concurs with impact BIO B.8 that the impacts to the Pre-Approved Mitigation Area (PAMA) are significant and not mitigable.
6. Executive Summary, Significant, Residual Impacts - Please revise as follows: Alternative B would result in a significant, potentially unmitigable loss of approximately 27 acres of native grassland within the ~~MSCP~~ and San Diego County MSCP Subarea Plan through development of a core wildlife area within a PAMA. The impact on native grassland within the PAMA conflicts with the MSCP Subarea Plan and the goals of the General Plan and the Alpine Community Plan related to preservation of natural resources.

CULTURAL RESOURCES

Staff has reviewed the cultural resources portions of the report titled, *"Draft Program Environmental Impact Report for High School Number 12"*, dated January, 2009, prepared by ICF Jones & Stokes. (Note: The Cultural Resources Technical Report, Appendix E, was not provided.) The DIER provides an overview of the potential impacts to cultural resources that were identified at each of the three alternative locations: Alternate B-Wright's Field, Alternate G-Chocolate Summit and Alternate J-Lazy-A Ranch. Each alternative location will impact significant or potentially significant cultural resources.

7. County DPLU concurs with the record search and survey work summarized in the DEIR for this project relating to cultural resources both historic and prehistoric. Staff found the research thorough and well documented and is satisfied that the known important prehistoric sites will be avoided. Sites to be avoided and preserved by easement include CA-SDI-5199 in Alternative B, and sites CA-SDI-8722, CA-SDI-17194, CA-SDI-17195, CA-SDI-17196 and CA-SDI-17197 in Alternate J.
8. Staff does have concerns with the sites that have not been tested and/or evaluated (both historic and prehistoric) that will be impacted in each of the three alternatives. All site testing and evaluation is proposed after project approval and location selection, prior to grading. However, should human remains be uncovered in the prehistoric sites, or the historic structures prove to be significant, there is no opportunity is provided for alternatives to the proposed mitigation. In addition, no opportunity is given for the public to comment on the testing and evaluation of these resources.
9. Staff is concerned that the proposed mitigation for Historical Documentation (HABS/HAER) alone may not be adequate for the destruction of significant historic structures (should site assessment determine significance). In the case

of Architectural Heritage Association v. County of Monterey, 122 Cal.App.4th 1095 (2004), it was found that “archival documentation cannot normally reduce destruction of an historic resource to an insignificant level”. Also in the case of League Protection of Oakland, 52 Cal.App.4th 896 (1997), the Court of Appeal held that the historic resources of the building to be demolished “normally cannot be adequately replaced by reports and commemorative markers”.

10. Should future evaluation of the historic structures determine significance pursuant to CEQA criteria, DPLU recommends that adaptive reuse of the historic structures be considered as an alternative. It is understood that some of the buildings may be in poor condition, and that there is a cost associated with rehabilitation; however, CEQA requires mitigation of significant structures to a level below significance and all mitigation measures should be considered. In addition, rehabilitation can use the California Historical Building Code as adopted by the State Historical Building Safety Board, located in Title 24, Part 8. It is also published in the latest adopted California Building Code as Chapter 34, Existing Buildings, Division II, California Historical Building Code. DPLU recommends that the EIR evaluation of the historic structures include an analysis of what would be required for adaptive reuse of the significant structures.
11. Staff has noted that site of Alternative B, Wright's Field is the same site for the proposed Park Alpine project TM 5433, a 142 acre subdivision for 41 single family residential lots.
12. Additionally, a portion of Alternative J, Lazy-A Ranch, is an open County project: Oak Creek at Lazy A Ranch, project numbers: SP 07-002; GPA 07-010, REZ 07-011, TM 5546, MUP 07-016 for a residential subdivision. The parcels included in the Oak Creek project are: 404-231-05 and 404-042-01.

If you have questions regarding cultural resources, please contact Gail Wright with the Department of Planning and Land Use at (858) 694-3003.

LAND USE

13. Summary Page S-41 – LU B.1 states in the second paragraph that “mitigation measures could be implemented to reduce stadium and PA noise” yet on page S-44, it appears that these are required. LU B.1 does not imply that these measures will be required or pursued. Please clarify.
14. Section 3.8 Land Use - Discussion of the effects of the proposed project on planned land uses should include reference to the County's Community Trails

Master Plan (CTMP), which is the implementing document for the County Trails Program described in the Public Facilities Element of the San Diego General Plan. The CTMP contains adopted individual community trails and pathway plans.

Communities participating in the CTMP are doing so because they have reached a consensus on the importance of recreational trails in their area and have expended considerable time and effort in formulating community trails plans. The Alpine Community Trails and Pathways Plan identifies proposed trail corridors within each of the three proposed school sites. The DEIR should be revised to include an analysis of any potential conflicts with or impacts to these proposed trails and pathways.

If you have any questions regarding trails or pathways locations, trail alignment study, or potential options, please contact Maryanne Vancio, County Trails Program Coordinator, Department of Parks and Recreation at 858-966-1372 or e-mail at: maryanne.vancio@sdcounty.ca.gov.

TRANSPORTATION AND TRAFFIC

Transportation Division staff has reviewed the following documents regarding the proposed Grossmont Union High School District, High School #12 in the Alpine community:

- Traffic Impact Analysis (TIA) prepared by Kimley-Horn and Associates dated December 2008
- Draft Program Environmental Impact Report prepared by ICF Jones & Stokes dated January 2009

TRAFFIC IMPACT ANALYSIS (TIA)

15. The proposed high school project will generate substantial new and redistributed trips onto County Circulation Element roads in the Alpine area. The proposed projects will result in significant cumulative traffic impacts to Circulation Element Road throughout the Alpine area.
16. The proposed project should contribute to the County's Transportation Impact Fee (TIF) Program to mitigate the proposed projects cumulative traffic impacts.
17. An opening year traffic assessment with 1,100 students and the existing road network and horizon year (2030) traffic assessment with 2,200 students and

build-out of the County Circulation Element Roads by others assessment is provided. At this time, there is no proposed condition that would restrict expansion of the school to 2,200 students prior to 2020. The TIA should include an analysis of the school's peak capacity of 2,200 students in the Existing/Opening-Year Scenario. There is also no guarantee that other projects will construct the Circulation Element Roads prior to expansion of the school to 2,200 students. A phased traffic assessment should be provided based upon the anticipated road network at the time the school enrollment is expanded.

18. A near term cumulative traffic assessment, (existing plus project plus near term projects) should be provided. Preparation of the list of near-term / cumulative proposed / pending projects should be coordinated with the Department of Planning and Land Use.
19. On page 6-30 it is noted that fairshare contributions toward the installation of traffic signals should be provided to mitigate direct impacts at several intersections. Fairshare contributions alone will not fully mitigate a direct traffic impact.
20. The TIA should identify what uses are allowed under the existing land use permits for each of the proposed alternatives and compare it to the proposed school trip generation.
21. The TIA should include an assessment of potential impacts at the Marshall Road (El Tinge Drive)/Alpine Boulevard intersection.
22. The TIA should specify the traffic volume on Alpine Boulevard between East Victoria Drive and Marshall Road (El Tinge Drive). The TIA should assess potential traffic impacts at this location.
23. Construction permits from the County of San Diego will be required for access onto the County Circulation Element Roads at the proposed driveways and for any other work within the County right-of-way.
24. The TIA should provide greater detail and analysis of the proposed driveways / access points for each of the alternatives. The need for turn pockets and acceleration lanes should be assessed. Based upon the anticipated traffic volumes turn pockets and other access improvements should be constructed by the proposed project prior to construction of the proposed school.

25. Conceptual plans for access, intersection and other improvements in the County right-of way should be provided. The following are access related items which should be addressed:
 - Corner sight distance adequacy at the project driveways.
 - Lane geometric improvements at each of the project driveways/intersections.
 - Conceptual striping and signing plans should be provided for all proposed road improvements and should identify existing and/or proposed bike lanes. (Both South Grade Road and Alpine Boulevard are part of the County's Bicycle Roadway Network.)
 - The TIA should demonstrate that the throat length at driveways and the bay length of any dedicated turn lanes on County roadways will be sufficiently long enough to minimize traffic queues during peak pick-up/drop-off times.
 - County's Design Standards for minimum driveway/road spacing.
26. Frontage improvements along the proposed school sites should be provided.
27. Dedications and preservation of right-of-way along the ultimate County Circulation Element Road cross sections should be identified and provided.
28. The safe routes to school for each project site should be identified. Identification and assess of the provision of pedestrian facilities along the proposed safe routes to school should be provided for each site.
29. The TIA should identify the proposed school operation times and how those proposed times would impact the peak traffic periods.
30. The Traffic Volume Adjustment exhibits should be included in the main body of the text, not in the Appendix. Also, this section should include an exhibit showing the existing school's traffic volumes on roadway segments. At this time, it is not possible to determine if "Plus Project " scenarios/tables/exhibits are correctly showing the net result between adding the proposed projects' trips and subtracting the existing school's trips.
31. Tables 8-1 and 8-2 should be consistent when arranging the study area columns.
32. For the Study Area B alternative, the TIA recommends the installation of traffic signals as mitigation measures for impacts to several intersections. Traffic signal warrants should be prepared to verify that traffic signal warrants are

satisfied. The installation of traffic signals on County maintained roads would also require approval from the County Board of Supervisors.

33. For Study Area G, an evaluation of the potential for pedestrians crossing the South Grade Road at the intersection of South Grade and Via Viejas should be provided.
34. For the Study J alternative, pedestrian facilities should be provided/verified between the intersection of Alpine Boulevard/East Victoria Drive and the access to the proposed high school.
35. For the Study J alternative, the proposed high school project will result in direct traffic impacts to the Alpine Boulevard/East Victoria Drive intersection, the Alpine Boulevard Willows Drive intersection, the I-8 Eastbound off ramp/Willows Road intersection and the I-8 Westbound onramp/Willows Road intersections. Mitigation measures to address these impacts should be proposed.

DEIR

36. Comments listed above for the proposed project's TIA should also be addressed in the DEIR.

Note to Land Development Project Manager: A copy of the TIA should be submitted to Caltrans for their review and comments.

If you have any questions regarding the above comments, please call Bob Goralka, County Traffic Engineer, with the Department of Public Works at (858) 874-4202.

In conclusion, the County would like to reiterate that Alternatives G and J appear to be viable sites for the intensity of development that a new high school would require. The biological impacts associated with Alternative B, considered a Biological Resource Core Area (BRCA) would have far reaching impacts to the region and jeopardizes the ability of the County to meet the regional conservation goals of the San Diego County MSCP Subarea Plan. The County has made a significant investment in preserving the biology in the area and the development of a high school on the site would impede the connectivity of the wildlife corridors in the area and significantly reduce the sensitive habitats found on-site.

The County of San Diego appreciates the opportunity to participate in the environmental review process for the Grossmont Union High School District's proposed High School No. 12 in Alpine. We look forward to receiving future documents related to this project for review or to provide additional assistance at your request. If you have

any questions regarding these comments, please contact LeAnn Carmichael at (858) 694-3739.

Sincerely,

ERIC GIBSON, Director
Department of Planning and Land Use

cc: Vince Nicoletti, CAO Staff Officer, DCAO, M.S. A-6
Bob Goralka, Transportation Division, Department of Public Works, M.S. O334
Trish Boaz, Department of Parks and Recreation, M.S. O-29
Priscilla Jaskowiak, Administrative Secretary, Department of Planning and Land Use, M.S. O650
LeAnn Carmichael, Department of Planning and Land Use, M.S. O650

Exhibit H

Wright's Field MSCP Preserve Phase IV



Environmental Enhancement and Mitigation Program Application

Submitted by

The Back Country Land Trust
and
The County of San Diego
Department of Parks and Recreation



BACK COUNTRY LAND TRUST
338 W. Lexington Avenue, Suite 204
El Cajon, CA 92020
(619) 590-2258 FAX (619) 590-2248 www.bclt.org

Preserving San Diego's Back Country Since 1991

December 6, 2003

Mr. Dave Brubaker
EEM Program Coordinator
State of California Resources Agency
1416 Ninth Street, Suite 1311
Sacramento, CA 95814

Dear Mr. Brubaker,

It is our pleasure to submit this application to the Environmental Enhancement and Mitigation (EEM) Program on behalf of the Back Country Land Trust and the County of San Diego Department of Parks and Recreation for Phase IV of the Wright's Field Multiple Species Conservation Plan (MSCP) Preserve. Support from the EEM Program has been critical to the success achieved to date in this land acquisition project.

Wright's Field encompasses a large, high quality native grassland in association with coastal sage scrub, Engelmann oak woodland, vernal pool and riparian habitats, and includes a number of endangered and sensitive species. It is a critical component of the County's Multiple Species Conservation Plan and the State's Natural Communities Conservation Program. In the first three phases of this land acquisition project, starting in 1997, the EEM Program has provided \$1,250,000. This has been matched by the County with \$1,445,000, and \$212,000 mitigation from the Alpine School District, to acquire 230 acres in collaboration with The Back Country Land Trust, which manages the preserve.

This land acquisition project has the wholehearted support of the Alpine community while the preserve itself provides an outstanding educational resource for students in the adjacent Joan McQueen Middle School. The County Supervisor for eastern San Diego County, Dianne Jacob, who has been instrumental in establishing the MSCP, enthusiastically supports the creation of an MSCP preserve in Wright's Field.

We seek the continued support of the EEM Program in this highly worthy project.

Yours Sincerely,

C. D. Stout, Ph.D.

Director of Resources
Back Country Land Trust

Page 3

Insert 'EEMP Application' Cover form page (A)

Print separate Word doc, 'EEMP_page_3_5_insert.doc'

Program Application

INSERT FAX FROM
DON POPE

B. RELATED TRANSPORTATION PROJECT

(B.1) Transportation District (B.2) City (B.3) County (B.4) Route Number/Name

(B.5) Location

(B.6) Description of Related Transportation Project

(B.7) Name of Transportation Agency

(B.8) Date Construction Began or Scheduled

(B.9) Name of Approved/Certified Capital Outlay Program for Related transportation Project

I certify that the information contained in this project application form, including required attachments, is accurate and that I have read and understand the Assurances which are a part of this application.

Signed Only YMS needs to sign

Date _____

(Grant Applicant's Authorized Representative, as shown on the Resolution)

RA (9/03)

Page 2 of 3

C. ASSURANCES

Applicant possesses legal authority to apply for the grant and to finance, acquire, and construct the proposed project; and by formal action (i.e., a resolution) the applicant's governing body authorized the filing of the application, including all understandings and assurances contained therein, and authorized the person identified as the official representative of the applicant to act in connection with the application and to provide such additional information as may be required.

Applicant will manage and maintain into the future any property acquired, developed, rehabilitated, or restored with grant funds provided through this program. For property acquisition or conservation easement, applicant will sign, notarize, and record an Agreement Declaring Restrictive Covenant (ADRC) developed by the California Department of Transportation. With the granting agency's prior approval, the applicant or its successors in interest may transfer the management and maintenance responsibilities in the property. If the property is not managed and maintained for the purposes stated in the Agreement, the state shall be reimbursed an amount at least equal to the amount of the grant award or, for real property, the pro rata fair market value of the property, including improvements, at the time of sale, whichever is higher.

Applicant will give the state's authorized representative access to and the right to examine all records, books, papers, or documents related to the grant.

Applicant will cause work on the project to be commenced within a reasonable time after receipt of notification from the state that funds have been approved and that the project will be carried to completion with reasonable diligence. If applicant cannot submit its first invoice for reimbursement to Caltrans by May 31, 2005, applicant will submit a statement of project progress appropriate to the project that provides real assurances that the project will be completed prior to April 30, 2007, including but not limited to: project advertisement or firm advertisement schedule, entry into escrow for acquisitions, date project plans will be completed, anticipated date of receipt of other needed funds from specified entity, etc.

Applicant will comply where applicable with provisions of the California Environmental Quality Act and the California Relocation Assistance Act and any other state, and/or local laws, rules and/or regulations.

Signed _____ Date _____
(Grant Applicant's Authorized Representative)

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3. Environmental Project Summary

A. Project Scope

Phase IV of the Wright's Field project will add the largest remaining and most critical parcel to the preserve. The 142 acre parcel surrounds already acquired Multiple Species Conservation Plan (MSCP) preserve land on three sides. The acquisition will bring the total area to 372 acres, and is critical to the biological and physical integrity of this MSCP preserve. The Phase IV parcel is entirely comprised of native grassland, coastal sage scrub, Engelmann oak woodland, and vernal pool habitats.

The MSCP is a nationwide model for habitat conservation and a key component of the State of California's Natural Communities Conservation Plan (NCCP). In 1998 the County of San Diego designated approximately 400 acres in Alpine in eastern San Diego County, encompassing Wright's Field, as a pre-approved mitigation area within the MSCP. The Department of Fish and Game, and the U.S. Fish and Wildlife Service support this designation. Inclusion of Wright's Field in the MSCP accomplishes significant protection of sensitive species and habitats, and provides wildlife corridors between components of the MSCP to the west and the Cleveland National Forest to the south and east.

The Wright's Field acquisition project has protected 230 acres to date. Phase I added 80 acres under the FY 98/99 EEM cycle (Project #98-34). Phases II and III were combined to add 120 acres under two awards, EEM 2000(068) and EEM 2001(040). An additional 30 acres (Findel Ranch) was acquired directly by the County of San Diego in 2002. Phase IV will add 142 acres. Only 40 acres in the total planned preserve area of ~400 acres remains.



Phases I, II and III are complete. Matching funds for Phase I were \$212,000 in the form of mitigation from the Alpine Union School District, and \$175,000 from the County of San Diego. Matching funds for Phase II and III were \$350,000 and \$450,000, respectively, provided by the County of San Diego, with in-kind services from the County and the Back Country Land Trust. (The initial matching funds of \$250,000 for Phase III were increased by the County to \$450,000 to complete the transaction.) In 2002, the County of San Diego purchased 30 acres of the Findel Ranch for \$470,000 and transferred title of the land to the Back Country Land Trust. This land represents a very important addition to the preserve; its purchase demonstrates the County's very strong commitment to the MSCP, and to the Wright's Field preserve. The Phase IV parcel is currently under option contract between the property owner and the Back Country Land Trust. The balance of the Phase IV acquisition cost will be provided by other habitat and open space protection funds. Management of the MSCP preserve is the obligation of the Back Country Land Trust.

The continuing support of the EEM program, in partnership with the Back Country Land Trust and the County of San Diego, remains essential to the success of this project. Overall the project is preserving high quality natural and historical resources, accomplishing significant mitigation, affecting regional and local planning, and providing an outstanding educational and recreational resource for the community of Alpine, the County of San Diego, and the State of California.

B. Location, Purpose, and Amount of Request

Wright's Field is located within the rural community of Alpine along Interstate 8, 35 miles east of San Diego, in the foothills of the Cuyamaca Mountains in San Diego County.

The Wright's Field project fulfills or exceeds all of the goals of the EEM Program. It combines resource protection and mitigation with a regional planning effort while creating an open space preserve with outstanding educational and recreational opportunities. Recognized for its habitat value, Wright's Field was included in the pre-approved mitigation area of the County of San Diego's Multiple Species Conservation Plan (MSCP). Local area and MSCP habitat maps are included in Exhibit F.

In the first three phases of the Wright's Field MSCP Preserve project, and with the addition of Findel Ranch, 230 acres have been acquired with \$1,250,000 from the EEM Program and \$1,445,000 from the County of San Diego. Mitigation from the Alpine School District provided an equivalent of \$212,000 in matching funds for Phase I. Therefore, \$2,907,000 has been expended to date in establishing the preserve.

This Phase IV proposal by the Back Country Land Trust and the County of San Diego Department of Parks and Recreation, requests an EEMP grant of \$300,000. The County of San Diego has committed \$470,000 as matching funds through purchase of 30 acres of Findel Ranch for the preserve. The Phase IV funds will be used toward purchase of the largest and most critical parcel of 142 acres required to complete the preserve.

Four sensitive habitats present on this parcel are coastal sage scrub, native grassland, Engelmann oak woodland and vernal pools, which occur throughout the Wright's Field area. The biodiversity within the grassland is high, and it is one of the best native grasslands remaining in the state of California. The preserve area has outstanding ecotonal value because the habitats are integrated. The preserve area provides a critical corridor between MSCP lands to the west and the Cleveland National



Native grassland, coastal sage scrub and Engelmann oak woodland are integrated in the Wright's Field MSCP preserve area.

Forest to the east. The purpose of the Wright's Field MSCP preserve project therefore is to add this critical component to the County-wide MSCP preserve.

The Back Country Land Trust and the County of San Diego are working as partners with community organizations to manage the preserve while providing the community with much needed opportunities for passive outdoor recreation. Moreover, Wright's Field provides an outstanding educational resource for students in the adjacent Joan McQueen Middle School, ensuring that future generations will learn about environmental resources and stewardship. These virtues of the project complement the MSCP goals of protecting sensitive habitats and species.

C. Explanation for Expanded Grant Request

In the combined Phase II and Phase III acquisitions, 120 acres were purchased at fair market value for \$1.8M (\$1,000,000 EEM funds and \$800,000 County matching funds). Escrow closed in September 2003. However, the property owner mandated that the original parcel boundaries be redefined, in order for the transaction to occur. Consequently, the remaining but newly defined 142 acre parcel surrounds the land already in the preserve to the west, south and east, while being north of the Findel component of the preserve (parcel map included in Exhibit J). It is essential to purchase this remaining parcel in order to create the MSCP preserve.

The current market value of the 142 acre Phase IV parcel is \$2,124,000. The expanded grant request for \$300,000 is required to complement the ~\$1.8M that the County of San Diego and Back Country Land Trust must secure to acquire this critical component of the preserve.

Wright's Field lies within the rapidly growing community of Alpine and, as such, has great development potential. It has been under repeated threat of development since 1992. However, due to the efforts of local citizens, the strong support of the County under the leadership of Supervisor Dianne Jacob, and the critical support of the EEM program, great progress has been made, and now 230 acres are permanently protected. However, without the remaining 142 acres, the entire preserve would severely diminished in value. The Phase IV land contains large expanses of high quality California native grassland (Exhibits F, G, J). The pre-approved mitigation area for the MSCP preserve encompasses ~400 acres and all of Wright's Field.



An Engelmann oak in Wright's Field. Engelmann oak woodland is the most rare native oak habitat in California.

The landowner remains a willing seller, and an option contract is presently in force. However, this agreement will expire in July 2005, and the land will again be at risk of development. Indeed, the reason for the owner's demand to redefine the parcel boundaries (Exhibit J) was to improve the

development potential of the remaining land, if habitat acquisition funds are not secured. In other words, the property owner is intent on selling the land either for the MSCP or for development. This expanded grant request is key to our efforts to complete this acquisition in a timely manner.

4. Agency Eligibility

A. Authorizing Resolution

The Authorizing Resolution was approved November 10, 1995 by the Back Country Land Trust Board of Directors (Attachment A), the first year that an EEMP application was submitted. This Resolution remains in effect. The IRS letter regarding the tax exempt 501(c)(3) status of the Back Country Land Trust is included as Attachment B.

B. Related Prior Experience

The Back Country Land Trust

The mission of the Back Country Land Trust is to preserve land in eastern San Diego County containing significant natural and cultural resources for the benefit of the public and future generations. This effort entails research and education, promotion of land conservation through donation, easement or purchase, and establishment and maintenance of trails. The land trust has been instrumental in the acquisition of over 3500 acres of resource lands in San Diego's back country since 1990.

The Back Country Land Trust is a non-profit 501(c)(3) organization with a paid Executive Director, established office in El Cajon, California, current annual budget of ~\$60,000, and an active membership of over 400 throughout the County. The land trust five-year strategic plan calls for significant growth in membership, increased community involvement, expansion of the annual operating budget, and significant additions to its endowment fund. The Back Country Land Trust received a \$100,000 gift from an Alpine businessperson in 2000. Land trust education and management programs have received significant grant awards from the San Diego Foundation.

The Back Country Land Trust has ownership and management responsibilities of Wright's Field MSCP preserve. The County of San Diego County Department of Parks and Recreation and the land trust are working together closely to implement a management plan. This on-



A native plant nursery at Joan McQueen Middle School is maintained by the students for vegetation and restoration projects on the school campus and in Wright's Field, and for sales at the annual Back Country Land Trust plant sale in Alpine.

going effort involves the Center for Natural Lands Management, the California Conservation Corps, the San Diego Coalition of Conservancies and local community groups, to obtain expertise and provide manpower. Projects have included the installation of fences, gates and signs, clean-ups, erosion control and exotic plant removal. In collaboration with San Diego State University a grassland restoration project is planned for a 10 acre disturbed area in the Phase I mitigation parcel.

The Back Country Land Trust has an extensive volunteer base. The land trust has operated the Youth for Conservation Program for several years, and works closely with the nearby Joan McQueen Middle School in outdoor education projects. The land trust has an active docent training program concerning natural resources, and docents lead nature walks with local and county-wide organizations (e.g. Alpine Historical Society, Chamber of Commerce, Audubon Society). The land trust hosts community outreach events, including an annual native plant sale and a dinner lecture series, and maintains a native plant demonstration garden in central Alpine.

The County of San Diego Parks and Recreation Department

The mission of the County of San Diego Department of Parks and Recreation is to preserve regionally significant natural and cultural resources and provide opportunities for high quality parks and recreation experiences. The Department has been developing, operating, and maintaining parks since 1913.

The Department has taken a leadership role in the region in the acquisition, development and operation of 90 open space preserves, regional and local parks and facilities, with over 40,000 acres administered. These lands include the acquisitions for the MSCP.

The Department has received well over \$85 million in state, federal and other types of grants for acquisition, development, rehabilitation/restoration and preservation projects.

The Department has received \$2.2 million in EEM grants, which were instrumental in the preservation and restoration of lands in Volcan Mountain, Tijuana River Valley, Guajome Regional County Park, and for the North County MSCP.

The Department and the Back Country Land Trust have collaborated in the preservation of 230 acres of unique biological resources, wildlife corridors, and sensitive habitats in the Wright's Field area of Alpine.

Page 12
Insert Attachment A – 1st page

Page 13
Insert Attachment A – 2nd page

Page 14
Insert Attachment B – 1st page

Page 15
Insert Attachment B – 2nd page

5. Related Transportation Projects

A. Discussion of Required and Additional Mitigation

This EEM project will greatly enhance the mitigation for environmental impacts to 34.6 acres coastal sage scrub habitat due to construction of a new 6-lane segment of Interstate 125 between La Mesa, El Cajon, and Santee in San Diego County. This impact has been mitigated by preservation of 70 acres of coastal sage scrub in Rancho San Diego according to the California Environmental Quality Act (CEQA).

This Phase IV enhanced mitigation project would result in the protection of ~40 additional acres of high quality coastal sage scrub. Hence, the enhanced mitigation raises the mitigation ratio from 2:1 to over 3:1. It also provides enhanced mitigation by being at another location (Alpine), and by contributing to a MSCP preserve. Diegan coastal sage scrub is one of the most threatened habitats in San Diego County, and is a critical habitat within the MSCP.

In addition, this EEM project will protect integrated habitat partners of coastal sage scrub, including ~70 acres of native grassland and ~30 acres of Engelmann oak woodland. The total 142 acre Phase IV area also includes ~10 acres of vernal pool habitat on heavy clay soils (Exhibits G, J). Therefore, the mitigation is enhanced by the presence of associated habitats, which increases the biological value of the coastal sage scrub.

B. Lead Agency Form Letter

The Transportation project lead agency form letter, from Don Pope, Caltrans District 11 representative, is attached.

Page 17
Insert form letter from Don Pope

6. General Criteria

A. Increased Mitigation and Enhancement

The Wright's Field MSCP Preserve Phase IV acquisition project in Alpine, CA significantly enhances the mitigation for the Caltrans new I-125 freeway construction between El Cajon, La Mesa and Santee, CA. While separated by ~20 miles both sites share the Diegan coastal sage scrub habitat indigenous to San Diego County. The Wright's Field project significantly enhances CEQA mandated mitigation already in place for this CalTrans project for five reasons.

First, the mitigation ratio for the impact to coastal sage scrub due to the Caltrans project is increased from 2:1 to greater than 3:1 by addition of ~40 acres in Alpine, CA.

Second, the coastal sage scrub to be protected is intimately associated with three other sensitive habitats, significantly increasing its ecotonal value. Because these habitats have evolved to function interactively, the viability of species within them is increased when they are protected together in an integrated whole.

Third, the Phase IV acquisition is a critical component of the MSCP preserve being assembled in eastern San Diego County. In particular, the coastal sage scrub on Wright's Field belongs to a larger connected complex of endangered habitats and corridors that have been identified as a statewide priority in the NCCP, namely native grasslands, riparian, vernal pool wetlands and oak woodlands. These are "Tier I" habitats under the Biological Mitigation Ordinance of San Diego County and the MSCP.



Coastal sage scrub overlapping with native grassland in Wright's Field. The knoll in this view is entirely within the 142 acre Phase IV parcel, and is covered with coastal sage scrub vegetation.

Fourth, Wright's Field functions as an important wildlife corridor between MSCP lands to the west in Harbison canyon, El Capitan Reservoir and the Oakridge preserve in Crest, and the Cleveland National Forest to the south and east. In particular, two drainages from Wright's Field lead west via Chocolate Creek to El Capitan Reservoir. These streambed corridors are a vital link for wildlife movement between habitats. Wildlife access to these streambeds on Wright's Field will be enhanced by the protection of the 142 acre Phase IV parcel, connecting MSCP preserve lands to the Cleveland National Forest.

Fifth, protection of Wright's Field in the MSCP preserve adds a key component to the County trail system planned for the Alpine area (discussed in Section 6(B)).

The proposed acquisition complements and reinforces federal, state, and local policies to preserve unique biological resources, corridors, and sensitive habitats, as well as

historic resources. It is compatible and will not interfere with the operation or safety of any transportation facility, nor will it limit any improvements to these facilities, and it significantly increases the mitigation for the designated I-125 project beyond that required by CEQA.

B. Statewide Project Goals and Local Cash Contributions

I. Statewide Resource Priorities

Habitat Protection

In January 1994, in an on-going effort to protect at-risk natural communities and wildlife species, the U.S. Fish and Wildlife Service, the California Department of Fish and Game, the Department of Forestry and Fire Protection, and The Nature Conservancy, performed an extensive GAP Analysis for the southwestern California region. This report lists 18 at-risk plant communities. Five of these are found on Wright's Field in significant concentration. Forty-two wildlife species in the Southwestern region were identified as being at-risk. Of these species, 11 are found on Wright's Field. The purpose of the analysis was to target and prioritize candidates for preservation before they became further endangered. This process led to the creation of the Multiple Species Conservation Plan for San Diego County, a habitat conservation plan based on requirements of the Endangered Species Act, and fulfilling goals of the State Natural Communities Conservation Plan.

Wright's Field is comprised primarily of three key habitats targeted for protection under the MSCP, Diegan coastal sage scrub, native grassland, and Engelmann oak woodland (MSCP vegetation communities map, Exhibit F). The U.S. Fish and Wildlife Service and the California Department of Fish and Game stressed their concern that sufficient native grasslands and oak woodlands / oak woodland riparian habitat be included in the MSCP. Subsequently, Wright's Field was included as a pre-approved mitigation area in the MSCP with the support of the Resource Agencies and the County of San Diego in a Board of Supervisors motion passed October 28, 1998.

A number of experts, agencies, and studies support the high habitat value of Wright's Field. Selected references are included as follows.

"The property has been ranked as having very high and high biological value in the Habitat Evaluation Model performed by Ogden Environmental for the Multiple Species Conservation Planning (MSCP) effort. ... The size of the grassland and the presence of numerous sensitive species occurring within this habitat on site provide



Spiny redberry bushes (*Rhamnus crocea*) in Wright's Field. These shrubs are the host plant for the *Hermes* copper butterfly, an example of a rare endemic species found only in San Diego County. The butterflies have been observed in the preserve area on several occasions.

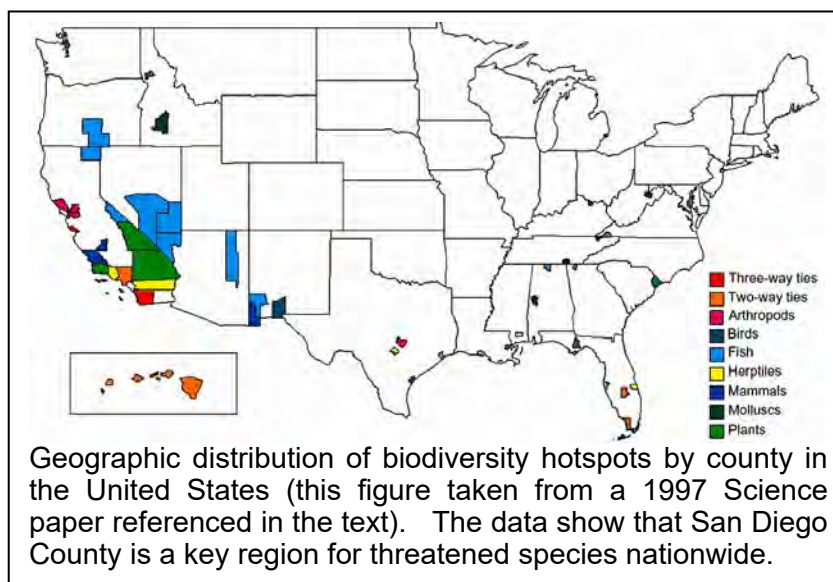
evidence that the site is of regional and cumulative significance." – California Department of Fish and Game.

Representatives from the US Fish and Wildlife Service and the California Department of Fish and Game concur with biologists that the site is "one of the largest and highest quality examples of southern California grassland remaining in San Diego County." - Nancy Gilbert, U.S. Fish & Wildlife Service. "The Wright's Field grasslands are one of the most biologically important valley grassland areas I have seen in the state." - Dr. Jason Hamilton. "Statewide it would certainly rank as one of the significant remaining grasslands." - Dr. Jon Keeley.

In an independent UC Santa Barbara GAP Analysis valley needle grassland was ranked as the second most at-risk plant community, following valley oak woodland. Both occur in the Wright's Field MSCP preserve area. At the same time, Engelmann oak woodlands have the smallest range of any California tree oak habitat and are an "at-risk" plant community according to this GAP Analysis. "Engelmann oak is probably the most imperiled of all tree oaks in California" (Oaks of California, Cachuma Press, p. 23). Engelmann oak woodland habitat is presently restricted to a small range, virtually all of which is in San Diego County.

Dr. Ted Case, a noted conservation biologist at UCSD, who has visited Wright's Field, has commented, "The site is characterized by a large expanse of Engelmann oak woodland, a habitat recognized as rare in California ('Sliding Toward Extinction: The State of California's Natural Heritage', 1987). I encourage you to preserve and protect this habitat and the many valuable biological resources that it harbors."

Data for the geographic distribution of endangered species in the United States were used to locate 'hot spots' of threatened biodiversity (A. P. Dobson *et al.*, *Science*, vol. 275, pp. 550-553, 1997). Hotspots were found where 'anthropogenic activities' coincided with regions possessing large numbers of endemic species. By this criterion, San Diego County is a biodiversity hotspot in the United States. This study concluded that 'conserving endangered plant species maximizes the incidental protection of all other species'.



It is not an exaggeration that the protection of natural resources in Wright's Field through the MSCP is important at the county, regional, state, and national levels.

Wetlands Protection and Acquisition

The predominant soil type on Wright's Field, according to USDA soil survey topographic maps, is heavy Bosanko stony clay, which absorbs and retains moisture for long periods, and does not percolate. As a result, Wright's Field contains vernal pool wetlands habitat. Approximately 10 acres within the Phase IV acquisition area contain mima mounds and depressions associated with vernal pool habitat. Exhibit G includes a picture of the mima mounds, and Exhibit J indicates the vernal pool area with respect to the parcel boundaries. The following wetland associated and indicator species have been observed in Wright's Field, except for the *Quino* checkerspot butterfly, but the host plant for this butterfly occurs extensively.

- *Crassula aquatica*, a vernal pool indicator plant species.
- *Scaphiopus hammondi* (western spadefoot toad), a vernal pool indicator species, which is present by the thousands, observed as tadpoles in the pools, and toads living within cracks in the heavy clay soil.
- *Acanthomintha ilicifolia* (San Diego thornmint), a state and federally listed endangered plant that occurs in three high density populations in the Phase II+III area.
- *Plantago erecta*, the host plant for the *Quino* checkerspot butterfly. These plants occur in dense patches throughout the grassland.



A vernal pool in the Phase IV acquisition area of Wright's Field. All of the native grassland is underlain by heavy clay soil. Large numbers of spadefoot toads are observed in these pools.

- *Euphydryas editha quino* (*Quino* checkerspot butterfly), a recently listed federal endangered species included in the MSCP. While not yet observed in Wright's Field, the extensive occurrence of the host plant, favorable habitat, and proximity to known populations to the east (Campo) and south (Baja), indicate that the butterfly was present historically. Hence, if not actually present, the preserve provides an ideal site for a *Quino* recovery program.

The presence of vernal pool habitat with heavy clay soils, and the availability of water in riparian habitat (included in the Phase II+III area), are vital for wildlife, and augment the value of the preserve as a corridor. Mountain lion, southern mule deer, bobcat, coyote, ringtail cat, gray fox, black-tailed jackrabbit and desert cottontail, have been observed or tracked on Wright's Field (additional species pictures and lists are included in Section 7(A) and Exhibit A).

Recreational Access

Wright's Field lies near the heart of the community of Alpine (Exhibit F). Its central location and relatively flat, open topography make it ideal for passive recreational uses. As is apparent from the aerial photograph (Exhibit J), a number of preexisting trails pass through Wright's Field. These trails are an important asset, allowing hiking, jogging, and horseback riding, and they link different segments of the community. Students of the Joan McQueen Middle School also use them. The Back Country Land Trust, and the County of San Diego Department of Parks and Recreation, are committed to maintaining and improving trails in Wright's Field for passive recreation and interpretive nature hikes.

Alpine is a rapidly growing community of over 15,000 residents. At present there is no publicly accessible trail system within the 108 square mile planning area linking Alpine to the Cleveland National Forest to the east, and to open space and trails to the west in the communities of Blossom Valley, Crest and Lakeside. In an effort to create an integrated trail system throughout the County, and provide an important recreational outlet for the community, the County of San Diego Department of Parks and Recreation is working closely with the Parks and Recreation Committee of the Alpine Planning Group, and in partnership with the Back Country Land Trust, to design and implement a trail system for the Alpine area. Members of the land trust serve on the Committee. This project has the support of the Alpine Chamber of Commerce, the Alpine School District, and the San Diego Trails Council.



Docents on the trail to learn about natural resources in Wright's Field.

The plan envisions Wright's Field as a nexus for the trail system in Alpine. Acquisition of the Phase I, II and III land in Wright's Field represents a significant step toward creation of a permanent trail system, and is already a tremendous asset to the community. However, it is equally clear that for a functioning network of trails to be created that the Phase IV parcel must be acquired.

II. Local Cash Contributions

The fair market value of the 142 acre Phase IV area (Exhibit J) is \$2,124,000 under the current option agreement (Exhibits B, C). As discussed in Sections 3(A) and 3(B), in the three phases of this EEM project to date, \$1,657,000 has been committed as matching funds. These funds have come for the County of San Diego (\$1,445,000), and from the Alpine School District as mitigation for the new Joan McQueen Middle School (\$212,000)

Findel Ranch

In 2002, the County of San Diego purchased 30 acres of the Findel Ranch for \$470,000 through the newly enacted Environmental Subdivision Ordinance, and transferred title of the land to the Back Country Land Trust. These 30 acres represent a very important

addition to the MSCP preserve; they are contiguous, contain high quality native grassland and Engelmann oak woodland, and link the preserve area to additional Engelmann oak woodland to the south (Exhibits F, J). The purchase of Findel Ranch demonstrates the County's commitment to the MSCP. This purchase is a part of the County's total \$1,445,000 commitment to creation of the Wright's Field preserve.

The Wright's Field MSCP preserve project has been in progress since 1998 with the leadership of District 2 County Supervisor Dianne Jacob. The project has entailed a strong partnership between the County of San Diego and the Back Country Land Trust, and has involved the participation of the Alpine School District (in Phase I) and the efforts of the Conservation Fund (in Phase I and Findel Ranch). Over the course of this project, significant contributions and volunteer efforts, directed by the Back Country Land Trust, have facilitated the acquisition process. At the same time, the land trust provides for management of the preserve. These volunteer contributions are difficult to quantify. However, because of the on-going commitment of the land trust to maintain the MSCP preserve in perpetuity, and provide an educational and recreational resource within it, these contributions will continue, and increase over the years.



In this view to the south from within the MSCP preserve, Findel Ranch is beyond the grassland at the base the hill in the distance. The 30 acre Findel Ranch was purchased by the County of San Diego for \$470,000 in 2002. This hillside is covered with Engelmann oak woodland and is protected by an open space easement (Exhibit J).

C. Project Readiness

The Phase IV parcel is currently under option contract for purchase from the property owner by the Back Country Land Trust. The same property owner was involved in the sale of the Phase II+III land to the County and the Back Country Land Trust. The option contract stipulates a two year period from the close of escrow of the Phase II+III purchase, which was in September 2003. The property owner received \$1,800,000 in that transaction for 120 acres, or \$15,000 an acre, based on appraisals and mutual agreement. The estimated cost of the 142 acre Phase IV area (Exhibit J) at this fair market value is \$2,124,000. The County and the Back Country Land Trust are working to secure the balance of the necessary funding within the option period, which ends in July 2005. The requested Phase IV EEMP funding would be expended by that time.

The \$300,000 request in this application is a critical component of the total acquisition cost. The Wright's Field MSCP project would not be possible without the support of the EEMP grants for Phases I, II and III. The Phase IV funds, matched by the County's purchase of Findel Ranch, will allow additional County, State and Federal habitat, wildlife, watershed, and open space protection funds to be secured.

The Back Country Land Trust will hold title to the entire MSCP preserve area (372 acres with inclusion of Phase IV), and manage the preserve lands under the guidelines of the MSCP. The project is consistent with state, regional, and local plans (Exhibit A). The related Caltrans I-125 transportation project has been funded, mitigated, and is complete. The Phase IV acquisition will not require environmental permits, approvals, or clearances as a resource lands acquisition.

7. Project Category Criteria (Resource Lands)

A. Important Resource Values

Biological Resources

One cannot overstate the important resource values associated with the overall project that spans five habitats and 18 sensitive, threatened, and/or endangered species. These resources include high quality California native grassland, Diegan coastal sage scrub, Engelmann oak woodland, as well as vernal pool wetland, riparian and chamise chaparral habitats. The Phase IV parcel consists of approximately ~70 acres of native grassland including ~10 acres of mima mound and vernal pool habitat, ~40 acres of Diegan coastal sage scrub, and ~30 acres of Engelmann oak woodland (Exhibits F, J). These undisturbed habitat areas occur in natural association, providing the entire 142 acre parcel with exceptional ecotonal value.

At the October 1995 Land Trust Alliance Rally, Dr. Reed Noss reported from his GAP analysis that grasslands and oak savannahs rated in the category suffering the second greatest loss of habitat nationally, coastal sage scrub rated in the third most endangered habitat nationally, and California riparian habitat rated in the fourth greatest loss category. All four of these habitats occur in Wright's Field, and three occur in the Phase IV area of the MSCP preserve.

The native grassland on Wright's Field lies at ~2000 ft. in elevation ~30 miles from the coast. This cismontane location is underlain by a lens of heavy, very rocky clay soils. The combination of soils and local climate means that the grasslands are particularly rich in biodiversity. At the same time the nature of the soil has prevented the grassland from ever being plowed or significantly disturbed; hence it is also particularly pristine.



Native bunch grass (*Nassella pulchra*) plants in Wright's Field. The MSCP preserve area includes 160 acres of native grassland where the density of bunch grass coverage is 50% or more (see also Exhibit G)

A research study into the genetic composition and morphological features of *Nassella pulchra* in Wright's Field was conducted by Drs. Kevin Rice and Eric Knapp of UC Davis for the Nature Conservancy using seeds collected from within the MSCP preserve area. In their published report (Dec. 20, 1995; #CARO 050195-PR-K) comparing 13 native

grassland locations throughout California, they found that *Nassella pulchra* plants from Wright's Field are genetically unique in several alleles while also being most similar to the native grasses at the Santa Rosa plateau in Riverside County. In transects conducted by Dr. Jason Hamilton from UC Santa Barbara in 1994 it was found that the size, plant density and basal coverage of bunch grass patches in Wright's Field is comparable to those in well studied native grasslands at Hastings Preserve in Monterey County and Sedgwick Ranch in Santa Barbara County. While these survey data are preliminary, they demonstrate the Statewide significance of the Wright's Field native grassland. A goal of the Back Country Land Trust to promote further scientific study of the grassland.

Wright's Field provides unique value for wildlife as a corridor for larger mammals including the bobcat, ringtail cat, coyote, deer, and mountain lion. Each of these animals have been observed or tracked. The preserve provides foraging habitat for raptors, including the golden eagle, Northern harrier, red-shouldered hawk, Cooper's hawk, white-tailed kite, American kestrel, great horned owl, barn owl, and red-tailed hawk. In addition, it provides nesting habitat for the grasshopper sparrow, burrowing owl, western meadowlark, and other ground nesting species known to occur on site. Wright's Field is a focus area for the San Diego Natural History Museum breeding bird atlas, and 102 species of birds have been documented in 15 focused surveys by expert birder Claude Edwards. Sensitive species of reptiles observed on Wright's Field include the San Diego coast horned lizard and the granite night lizard.

Wright's Field contains large populations of endangered or sensitive grassland associated species including the San Diego thornmint (ESA, CESA listed), Palmer's grapplinghook, chocolate lily, Cleveland shooting stars, blue-eyed grass, hyacinth, mariposa lily and field brodiaea. The presence of *Plantago erecta* and owl's clover indicates that the federally endangered *Quino* checkerspot butterfly may be present. Another rare invertebrate, the *Hermes* copper butterfly, has been observed in Wright's Field repeatedly, and its host plant, the spiny redberry, is present. Species occurring in Wright's Field relative to MSCP criteria are listed in Exhibit A.



Burrowing owls have been observed in Wright's Field on a number of occasions. Breeding pairs of another sensitive, ground nesting bird species, the grasshopper sparrow, also occur on site. (This photograph not taken at Wright's Field.)



Three high density populations of San Diego thornmint (*Acanthomintha ilicifolia*) occur in the Phase II+III parcel of the MSCP preserve area. Acquisition of the Phase IV parcel is critical to protecting the integrity of the entire preserve.

Watershed Resources

The Wright's Field MSCP preserve area lies in the watershed of three major San Diego County reservoirs. The Phase I, II and III parcels lie primarily in the watershed of El Capitan Reservoir, San Diego's largest drinking water reservoir. Most of the Phase IV area drains into Sweetwater Reservoir. A smaller portion lies in the Loveland Reservoir watershed. Consequently, permanent protection of Wright's Field provides a significant long term benefit to water quality in San Diego County.

Historical Resources

The Phase I, II and III areas contain very significant archaeological and historical features that are important to understanding prehistoric and Spanish Colonial uses of the grassland, associated oak woodland, and watercourses. Native American (Kumeyaay) milling sites and artifacts are numerous throughout the preserve, especially in Findel Ranch. An application to place a complex of Spanish rancho features, thought to date from the 1840s, is being prepared for the National Registry of Historic Landmarks, based on extensive research by members of the Back Country Land Trust. The Mission or



Overlapping native grassland and Engelmann oak habitat in Wright's Field. The MSCP preserve area is in the watershed of El Capitan Reservoir, the largest drinking water reservoir in San Diego County.

Spanish era rancho or rancheria features include stone foundations, dams, a cistern, water diversion walls, and an enormous and highly significant stone wall enclosure encompassing 10 acres. Completion of the MSCP preserve will provide essential protection to these unique archaeological and historical resources, and maintain their environmental aspect.

B. Sustainability

Mission

The nature of the MSCP program and the mission of the Back Country Land Trust assure the sustainability of the Wright's Field MSCP preserve. The MSCP is designed to protect habitat lands in perpetuity. The County of San Diego has a strong commitment to the MSCP. The MSCP is a program of the Department of the Planning and Land Use; the Department of Parks and Recreation is working on land acquisition projects for the MSCP. The Back Country Land Trust will hold title, manage, and maintain the preserve area in collaboration with these County Departments. The mission of the Back Country Land Trust is to preserve land in rural areas of San Diego County that contain natural, scenic, and cultural resources for the benefit of the public

and future generations. This commitment entails research, management, and education regarding resources, and the maintenance of trails.

Management

Management of open space lands, especially for habitat value, is a significant commitment in terms of planning, effort, and expense. The Back Country Land Trust is fully prepared to manage MSCP habitat lands in Wright's Field, having participated in land management efforts for over eight years. A comprehensive management plan for Wright's Field incorporates the requirements of the MSCP, and follows guidelines of the Land Trust Alliance and the Center for Natural Lands Management. An endowment fund has recently been established by the land trust with \$10,000. The goals of the endowment are based on an in-depth PAR analysis for maintenance and management costs conducted by the Center for Natural Lands Management. The funding for the PAR analysis was made possible by a grant from Bank of America.

The management plan is revised and implemented as each phase of the acquisition of Wright's Field occurs. An advisory board, consisting of people experienced in the multiple aspects of land management, has been assembled, together with a committee of land trust members and local volunteers, to implement the management plan. The volunteers have formed an association, the Friends of the Mesa del Arroz (Wright's Field) preserve. The Civilian Conservation Corps, Americorps, student members of our Youth for Conservation Program, and the San Diego Trails Council, assist in maintaining the property.

Management experience, funding, and projects and activities have been discussed in Section 4(B). Further examples of activities include: a project by the Civilian Conservation Corps to remove non-native trees at the entrance of the preserve and in the Phase I area; a major clean-up by Alpine citizens in April 2003 (Earth Day) in the Phase II+III property; erection of 4' wire fence with wooden posts along the western and northern edges of the Phase I parcel; erection of gates and signs at two entries to the Phase I parcel; erection of signs to prevent off-road vehicle entry from the Phase IV parcel (a condition of the option contract); on-going compilation of a comprehensive plant list in collaboration with Dr.

Jon Rebman of the San Diego Natural History Museum; on-going compilation of a bird species list based on periodic surveys since 1994 by expert birder Claude Edwards. These types of management activities will enable the Back Country Land Trust to



Civilian Conservation Corps youth working under the supervision of the California Department of Forestry to remove eucalyptus trees at the entrance to the Wright's Field preserve next to Joan McQueen Middle School. School students subsequently planted Engelmann oaks and other native plants here. The Back Country Land Trust organized these projects.

maintain and protect Wright's Field in perpetuity, in accord with area-specific management directives of the MSCP.

C. Other Benefits and Community Participation

This resource lands project provides public benefits at the local, regional, and statewide levels. At the same time the community activities associated with the Wright's Field preserve provide a model for management of other MSCP preserve areas.

Wright's Field is directly adjacent to the new Joan McQueen Middle School (Exhibit J). This creates a unique opportunity to educate future generations about environmental stewardship and community service. The preserve provides an outdoor laboratory where students can study firsthand about biological and historical resources, and participate in learning projects. The Back Country Land Trust is providing curricula based on preserve resources to teachers at the new school, and working with them closely in the development of educational activities. Two member of the land trust Board are members of the Alpine School Board.



A class project with students of Joan McQueen Middle School in Wright's Field to identify native and non-native species. A study of grassland ecology has been incorporated into the biology curriculum. Members of the Back Country Land Trust are teachers at the school.

This EEM project provides public access via trails to promote environmental awareness. A trail network is providing recreational opportunities for walkers, joggers, and horseback riders, as discussed in Section 6(B)(I). As discussed in Section 4(B), docent lead nature walks are conducted with Alpine and regional organizations, and the land trust sponsors public outreach events to promote environmental education and appreciation of the preserve. And as discussed above, management activities directly benefit youth based organizations. Scenic value is maintained in the rural country town of Alpine in accordance with the goals of its Community Plan. Additionally, creation of the MSCP preserve protects cultural resources from degradation.

Citizen involvement and local agency input has occurred throughout the planning and acquisition phases. The Back Country Land Trust has worked closely with the Alpine School District, the Sheriff's Department, the Parks and Recreation Committee of the Alpine Planning Group, and the County Department of Parks and Recreation, in the interest of meeting common educational and recreational needs while protecting resources. Because of this input, the management plan addresses the needs of the community while protecting resources of regional and statewide significance. We will continue to gather input and involve local citizens in the management of the preserve.

8. Exhibits

- A. Statement of Project Consistency with Plans
- B. Project Cost Estimate
- C. Project Budget
- D. Project Completion Schedule
- E. Project Expenditure Plan (N/A)
- F. Project Location Map (MSCP Habitats Map)
- G. Project Site Photos
- H. Project Design (N/A)
- I. Acquisition Schedule
- J. Acquisition Map (Parcels, Acres, and Phases)
- K. Tree Planting Certification (N/A)
- L. Planting Description (N/A)
- M. Supporting documents
- N. Letters of Endorsement



Exhibit A - Statement of Project Consistency with Plans

Multiple Species Conservation Plan

Wright's Field is an essential regional component of the MSCP for species and habitat protection, and as a wildlife corridor. The project is included by the County of San Diego as a Pre-Approved Mitigation Area within the MSCP (Exhibits F, J).

Table 3-5 of the MSCP lists 85 target species for protection under the plan. Of these, at least 12 are known occur in Wright's Field, or have been observed on the site.

- San Diego horned lizard
- Orange-throated whiptail (observed at Findel Ranch)
- Hermes copper butterfly (host plant abundant)
- Northern harrier
- Cooper's hawk
- Golden eagle (nesting sites in the vicinity)
- Burrowing owl (observed on numerous occasions)
- Southwestern willow flycatcher (observed once)
- Western bluebird
- Mountain lion (tracks)
- Southern mule deer (tracks)
- San Diego thornmint (3 high density populations)



San Diego horned lizard in the Wright's Field MSCP preserve.

Two sensitive species observed in the Wright's Field preserve area but not included in the MSCP target list are:

- Spadefoot toad (large numbers in the vernal pools)
- Grasshopper sparrow (breeding pairs documented)

Several species, included in MSCP Table 3-5, could occur due to the presence of their habitats, especially vernal pool habitat, or may not have been recorded due to limited surveys. The presence of suitable habitat for these species suggests the value of Wright's Field for recovery programs.

- o Thread-leaved Brodiaea - other species in the genus present
- o Orcutt's Brodiaea - habitat present
- o Dunn's Mariposa lily - other Calochortus species present
- o Orcutt's spineflower - species in the genus present
- o San Diego button-celery - vernal pool habitat present
- o *Hemizonia floribunda* - other species in the genus present
- o San Diego goldenstar - grassland associated species
- o *Navarretia fossalis* - sp. *hamata* present
- o Calif. Orcutt grass - vernal pool habitat present
- o San Diego mesa mint - vernal pool habitat present
- o Otay mesa mint - vernal pool habitat present
- o Quino checkerspot butterfly - host plant present
- o San Diego fairy shrimp - vernal pool habitat present
- o Riverside fairy shrimp - vernal pool habitat present
- o California gnatcatcher - present in coastal sage scrub several miles to the southwest



The Quino checkerspot butterfly is an endangered species whose habitat and host plant occur in Wright's Field.



Brodiaea jolonensis is abundant throughout the native grassland in Wright's Field.



Calochortus splendens (Mariposa lily) is common in the Wright's Field MSCP preserve area.



Large patches of *Plantago erecta* (small white flower heads), the host plant of the Quino checkerspot butterfly, occur in Wright's Field.

Wright's Field provides an important corridor between designated MSCP areas in Harbison Canyon and El Capitan reservoir to the west and north, and the Cleveland National Forest (CNF) to the east and south. The importance of this linkage has been emphasized by the CDFG and USFWS.

In a 3/11/94 CDFG letter concerning Wright's Field it is stated that the "site may act as a stepping stone of habitat for mammals and birds as they move from the Sweetwater River area towards El Capitan Reservoir and the CNF, or *vice versa*. ... Connectivity to the Loveland Reservoir and public lands to the south may be an important link in the eastern part of the MSCP."

In a 3/7/94 USFWS letter regarding Wright's Field it is stated that the "area maintains a healthy ecological diversity indicated by the presence of large mammalian predators. Connectivity ... from nearby natural areas appears to occur through riparian drainages linking the ... site to El Capitan Reservoir to the northwest and through open land to the south ... that is adjacent to National Forest lands. Maintaining this connectivity between Forest Service land and areas to the north ... may be important to the eastern portion of the MSCP."

The riparian drainages to the west are apparent in MSCP Habitats Map (Exhibit F).

Further, the MSCP plan states on page 4-28 (5/15/97): "Harbison Canyon is a key corridor, and the only location in the vicinity ... where wildlife can cross under 1-8. The Harbison Canyon / Chocolate Canyon drainage is a natural open space connection to the City of San Diego Watershed lands surrounding El Capitan Reservoir to the north." Chocolate Creek is the riparian drainage that connects Wright's Field to the El Capitan Reservoir.

San Diego County General Plan

The EEM project is consistent with the San Diego County General Plan. The Wright's Field area is specifically mentioned as a particular resource on page X-K-1 of Part X, Conservation Element, of the San Diego County General Plan under Resource Conservation Areas for Alpine. '3. Oak-Riparian Woodland in Drainages Between Alpine Boulevard and South Grade -- These woodlands provide seasonal habitat for birds and movement corridors for native mammals, with the area significant also for the presence of *Fritillaria biflora* (chocolate lily), a rare plant, and an oak woodland area.' A large number of chocolate lilies occur in the MSCP preserve area. (The County's General Plan is currently undergoing its 'GP2020' update.)



Animal tracks and paths in Wright's Field, which provides an important wildlife corridor between MSCP lands and the Cleveland National Forest.



Chocolate lilies (*Fritillaria biflora*) and native bunch grasses in Wright's Field.

Alpine Community Plan

This EEM project is also consistent with the Alpine Community Plan because it directly addresses the following elements:

Conservation Element: p. 30 'Encourage the protection and conservation of unique resources in the Alpine Planning Area. Utilize all measures to preserve rare, threatened, or endangered plant life. Protect the rare Engelmann oak wherever possible.' p. 31 'Preserve riparian woodland as an important component of habitat for wildlife, and as a necessary corridor of movement between different ecosystems, essential to the viability of wildlife populations.'

Open Space Element: p. 34 'Encourage the development and preservation of a system of open space for wildlife corridors linking residential areas to permanent open space in the Cleveland National Forest, and nearby lakes and wildlife preservation areas... Encourage preservation of riparian habitat in corridors that connect larger habitats... Provide recreational opportunities through the preservation of open space areas... Explore all funding sources for acquisition, upkeep and protection of open space / recreation preserves.'

Recreational Element: p. 38 'Encourage the acquisition and development of park lands which will protect outstanding scenic and riparian areas, cultural, historical and biological resources.'



The annual Back Country Land Trust native plant sale is very popular in Alpine. This is one of a variety of events that educate people about the value of the Wright's Field preserve.

San Diego County wildfires

Wright's Field did not burn in the catastrophic San Diego County Cedar Fire, October 26-28, 2003, that burned north, east and west of Alpine. The preserve area also did not burn in the 10,000 acre Viejas fire January 4, 2001, that occurred east and south of Alpine. It did, however, burn completely in the 1970 Laguna fire, as seen in aerial photographs. To our knowledge, there has been on average one small fire in the preserve area per year over the past 12 years. These fires are usually 3-10 acres in size and are quickly extinguished by local fire departments and the CDF. All but one, which was started by a lightning strike in the grassland in August, has been started by people's careless behavior. We expect this problem to diminish as management controls become more strictly enforced, especially now that the entire perimeter of the preserve is being posted (new signs around the Phase IV parcel are scheduled to be installed in December, 2003).

We are aware of the complexity the issues relating to fire, habitat, and wild lands. At present, members of the Back Country Land Trust are evaluating these issues, and a geography professor and expert in fire ecology has recently joined the Board. The

MSCP defensible space criteria have been, or are being, implemented in the specific locales where the preserve boundary is directly adjacent to private properties with homes. The land trust is working with the Alpine Fire Department on this issue. An alternative to controlled burns for fuel reduction as well as removal of non-native plant species is steam treatment, as employed by the Soil Erosion and Restoration Group at San Diego State University. A proposal is pending by SERG and the Back Country Land Trust to carry out experimental steam treatment in a 10 acre disturbed portion of the Phase I area. This project would be supplemented by \$8,000 in mitigation funds set aside by the Alpine School District. If successful, this treatment may reduce excess fuel accumulation without the potential danger of conducting controlled burns.

Exhibit B – Project Cost Estimate

Total Project Cost	\$2,124,000
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Exhibit C – Project Budget

Resource Lands Acquisition Cost	
Parcel C ¹ APN 404-170-04	40.00 acres
Parcel B ¹ APN 404-170-05	<u>101.62 acres</u>
Total Project Size	141.62 acres
Price per Acre ²	\$15,000
Total Project Cost ³	\$2,124,000
EEMP Phase IV Request	\$300,000
Matching Funds ⁴	(\$470,000)
Balance ⁵	\$1,824,000

(1) Parcels 'B' and 'C' comprise the total Phase IV area depicted in Exhibit J.

(2) Minimum price set in the option contract between the property owner and the Back Country Land Trust.

(3) Additional expenses in completing the purchase of the Phase IV parcels, such as appraisal, surveys, title reports, title insurance, and escrow fees, will be the obligation of the Back Country Land Trust and/or the County of San Diego.

(4) In 2002 the County of San Diego purchased 30 acres of Findel Ranch for \$470,000 as a valuable addition to the MSCP preserve (Exhibits F, J). Under the Environmental Subdivision Ordinance, title was transferred to the Back Country Land Trust.

(5) The balance of the acquisition cost is being sought by the Back Country Land Trust and the County of San Diego from established State and Federal habitat, wildlife, watershed, and open space protection sources. To date the ~\$2.9M cost of establishing 230 acres of the preserve has been provided by the EEM Program and the County of San Diego, with mitigation by the Alpine School District. The Back Country Land Trust may initiate a pledge campaign for major fund raising for land acquisition. There are many supporters of the land trust and the Wright's Field preserve in Alpine. The land trust could also participate in the possible formation of a local tax assessment district that would fund active parks and open space protection.

Exhibit D – Project Completion Schedule

Creation of the Wright's Field MSCP preserve has been on-going since 1998, and Phases I, II and III are complete (Exhibit J; Section 3(A)). The option contract between the Phase IV property owner and the Back Country Land Trust extends until ~7/1/05. Following Phase IV, the remaining parcels to be acquired are ~40 acres in the northeast portion of the MSCP pre-approved mitigation area (Exhibits F, J). This area contains a steep ridge, numerous boulder outcrops, and Engelmann oak woodland, and the threat of possible development is not as imminent as for the grassland area of the preserve.

Exhibit E – Project Expenditure Plan

N/A

Exhibit F – Project Location Map (MSCP Habitats Map)

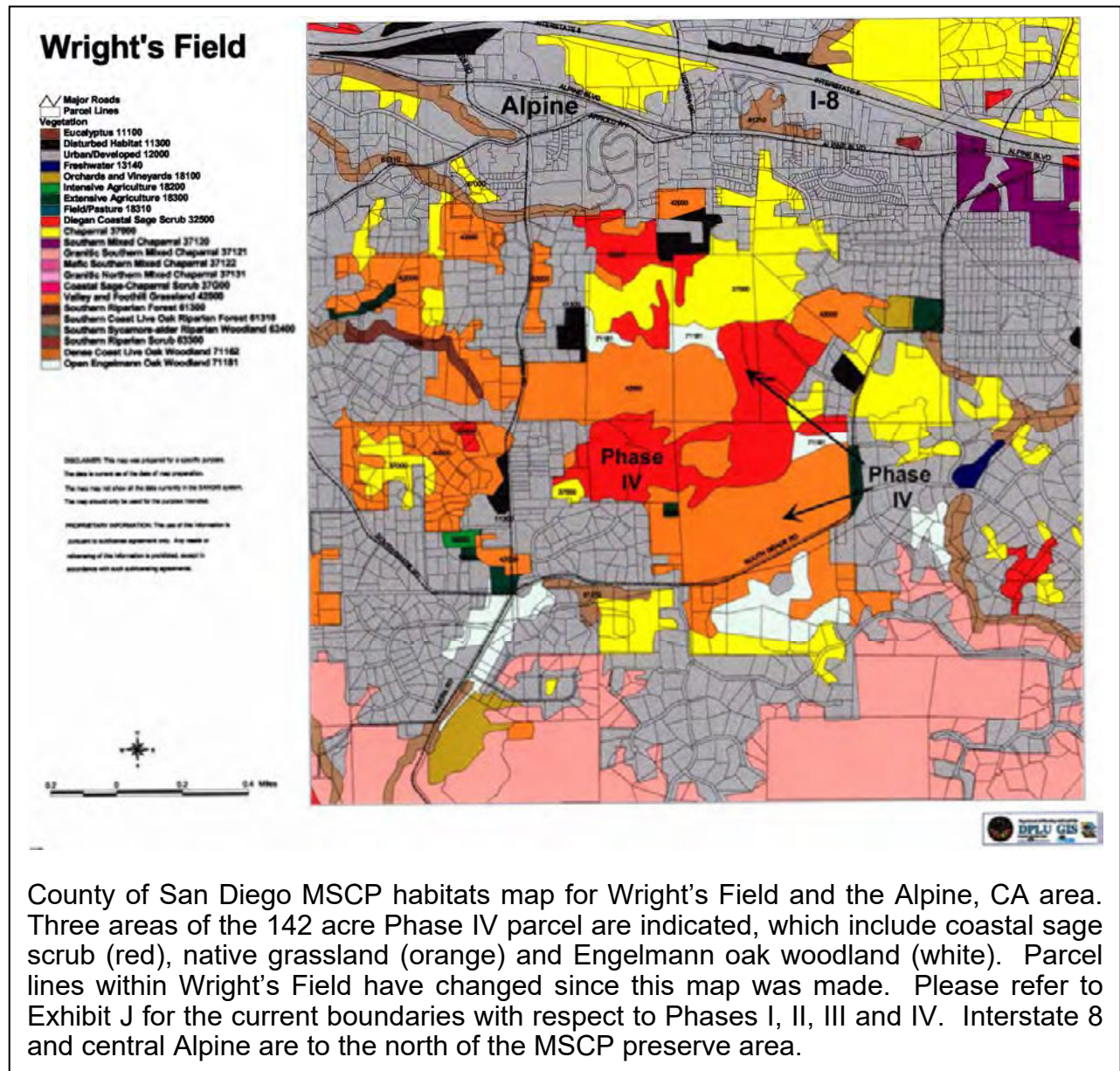


Exhibit G – Project Site Photos

Additional photographs of habitat lands in the Wright's Field MSCP Preserve area.



Coastal sage scrub in the Phase IV parcel.



The Wright's Field MSCP preserve area contains 160 acres of native grassland where the coverage of *Nassella pulchra* is ~50% or greater, as seen in this view in the Phase I parcel.



Mima mounds indicative of vernal pool habitat within the Wright's Field MSCP preserve area. All of the native grassland is underlain by heavy clay soil (Bosanko stony clay). This view to the west includes land in the Phase IV parcel and land recently acquired for the preserve.

Exhibit H – Project Design

N/A

Exhibit I - Acquisition Schedule

The option contract between the Phase IV property owner and the Back Country Land Trust extends until ~7/1/05. A request for EEM funds will follow CTC guidelines. Board of Supervisors approvals of matching funds, and funding from other sources, will depend on identification of those sources.

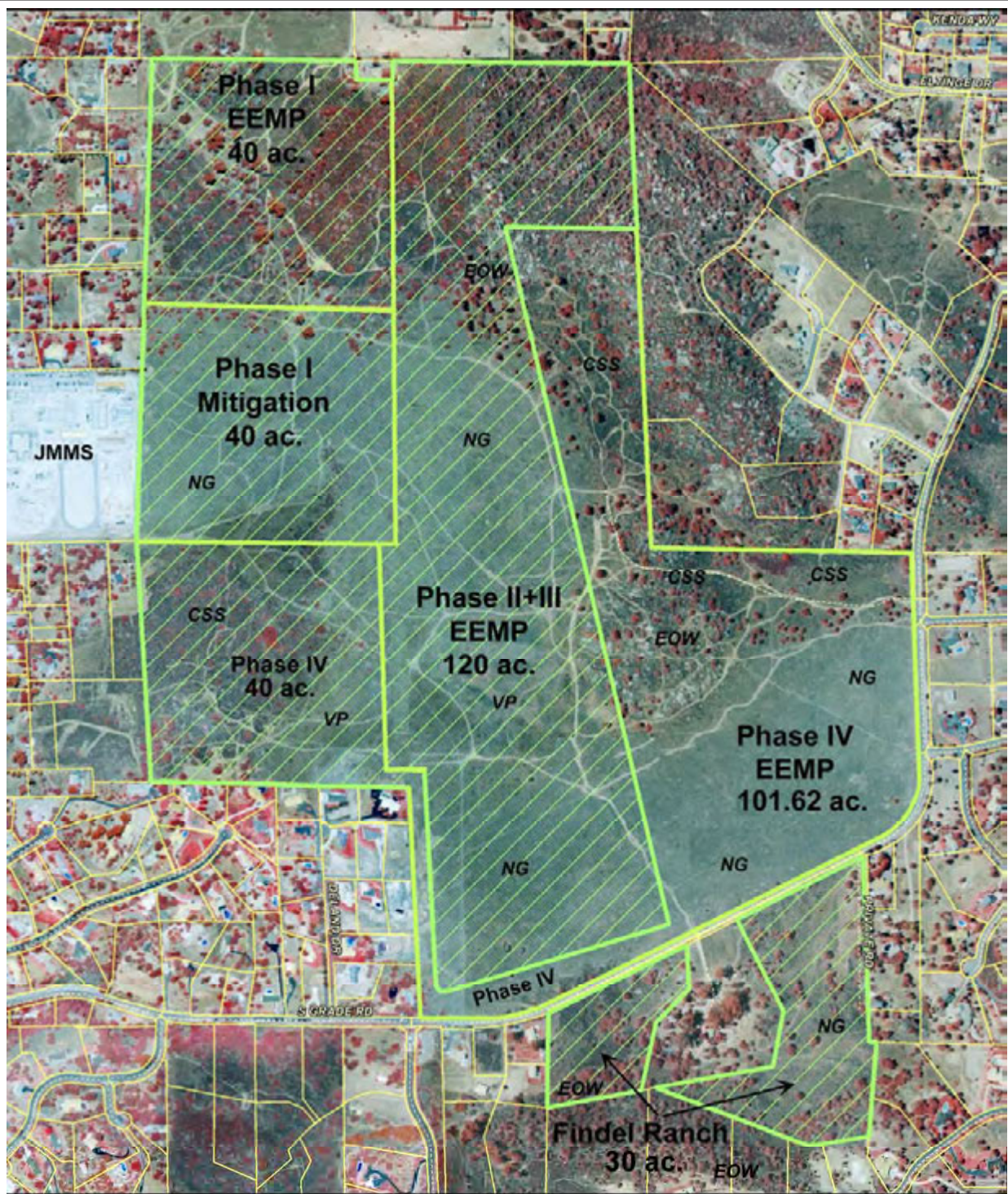
Exhibit J – Acquisition Map (Parcels, Acres, and Phases)

Acquisition Map description

Parcels, acreages, and phases in the Wright's Field MSCP preserve project are superposed on the aerial photograph on the next page. Yellow lines indicate parcels. The 230 acres of Phase I, II and III parcels, and Findel Ranch, are owned and managed by the Back Country Land Trust in partnership with the County of San Diego Department of Parks and Recreation. The Phase IV parcel surrounds the already acquired portions of the preserve to the east, south and west. The unusual shape of this parcel is the result of a condition by the property owner at the time of the sale of the 120 acres in the Phase II + III purchase.

The preserve lands include the integration of native grassland ('NG', uniform green), coastal sage scrub ('CSS', darker green), and Engelmann oak woodland ('EOW', green and mottled red). Vernal pool habitat occurs near the center of the Phase II+III parcel, and within the Phase IV parcel to the west, indicated by 'VP'. Habitats are depicted in the MSCP habitat and location map (Exhibit F). Future additions to the preserve in the pre-approved mitigation area of the MSCP include ~40 acres of smaller parcels to the north and east of the Phase IV area. About 20 acres of Engelmann oak woodland is protected in an open space easement south of Findel Ranch.

The square-shaped western portion of the Phase IV area is Parcel 'C' (APN 404-170-04; 40.00 acres). The larger eastern portion of the Phase IV area is Parcel 'B' (APN 404-170-05; 101.62 acres). The new Joan McQueen Middle School is directly west of the Phase I mitigation parcel. This Dept. of Public Works photograph was taken in the summer of 2000.



City of San Diego
Department of Public Works
Geographic Information Services



Wright's Field MSCP Preserve Alpine, CA



1 inch equals 720 feet

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Exhibit J

Exhibit K – Tree Planting Certification

N/A

Exhibit L – Planting Description

N/A

Exhibit M – Supporting Documents

Board of Supervisor resolutions, Agreements to Disclose Restrictive Covenants, and Conservation Easements, involving the CTC, County of San Deigo Department of Parks and Recreation, Alpine School District, and Back Country Land Trust, are on file for Phases I, II and III, and Findel Ranch. An ADRC for the Phase IV property will be submitted at the time of acquisition.

Exhibit N – Letters of Endorsement

1. Letter from San Diego County District 2 Supervisor, Dianne Jacob
2. Letter from US Fish and Wildlife Service

Exhibit I

STATEMENT OF PROCEEDINGS
COUNTY OF SAN DIEGO BOARD OF SUPERVISORS
REGULAR MEETING
MEETING AGENDA
WEDNESDAY, JANUARY 13, 2021, 9:00 AM
BOARD OF SUPERVISORS NORTH CHAMBER
1600 PACIFIC HIGHWAY, SAN DIEGO, CALIFORNIA

Order of Business

- A. REGULAR SESSION: Meeting was called to order at 9:00 a.m.

PRESENT: Supervisors Nathan Fletcher, Chair; Nora Vargas, Vice-Chair; Joel Anderson; Terra Lawson-Remer; Jim Desmond; also, Andrew Potter, Clerk of the Board of Supervisors.

(Please note, California Governor Gavin Newsom issued Executive Order N-29-20 on March 17, 2020, relating to the convening of public meetings in response to the COVID-19 pandemic. Pursuant to the Executive Order, and to maintain the orderly conduct of the meeting, all members of the Board of Supervisors attended the meeting via teleconference and participated in the meeting to the same extent as if they were present.)

- B. Closed Session Report
- C. Non-Agenda Public Communication: Opportunity for members of the public to speak to the Board on any subject matter within the Board's jurisdiction but not an item on today's agenda.
- D. Approval of the Statement of Proceedings/Minutes for the meeting of December 9, 2020.

ACTION:

ON MOTION of Supervisor Fletcher, seconded by Supervisor Lawson-Remer, the Board of Supervisors approved the Statement of Proceedings/Minutes for the meeting of December 9, 2020.

AYES: Vargas, Anderson, Lawson-Remer, Fletcher, Desmond

- E. Formation of Consent Calendar
- F. Discussion Items

NOTICE: THE BOARD OF SUPERVISORS MAY TAKE ANY ACTION WITH RESPECT TO THE ITEMS INCLUDED ON THIS AGENDA. RECOMMENDATIONS MADE BY COUNTY STAFF DO NOT LIMIT ACTIONS THAT THE BOARD OF SUPERVISORS MAY TAKE. MEMBERS OF THE PUBLIC SHOULD NOT RELY UPON THE RECOMMENDATIONS IN THE BOARD LETTER AS DETERMINATIVE OF THE ACTION THE BOARD OF SUPERVISORS MAY TAKE ON A PARTICULAR MATTER.

Board of Supervisors' Agenda Items

- | Agenda # | Subject |
|-----------------|--|
| 1. | NOTICED PUBLIC HEARING:
EL MONTE RIVER VALLEY - APPROVE ACQUISITION OF
APPROXIMATELY 98 ACRES OF LAND IN LAKESIDE FROM
HELIX WATER DISTRICT FOR ACTIVE RECREATION AND TRAIL
CONNECTIVITY
[FUNDING SOURCES: AVAILABLE PRIOR YEAR GENERAL FUND
FUND BALANCE AND DISTRICT TWO NEIGHBORHOOD
REINVESTMENT PROGRAM FUNDS] |
| 2. | TRAFFIC ADVISORY COMMITTEE (01/13/2021 - ADOPT
RECOMMENDATIONS; 01/27/2021 - SECOND READING OF
ORDINANCE) |
| 3. | ADOPT A RESOLUTION TO APPLY FOR AND ACCEPT GRANT
FUNDS FROM THE CALIFORNIA NATURAL RESOURCES
AGENCY URBAN GREENING GRANT PROGRAM
[FUNDING SOURCE: DEPARTMENT OF PARKS AND
RECREATION GENERAL PURPOSE REVENUE] |
| 4. | ADOPT A RESOLUTION TO APPLY FOR AND ACCEPT GRANT
FUNDS FROM THE STATEWIDE PARK PROGRAM GRANT
PROGRAM
[FUNDING SOURCE: DEPARTMENT OF PARKS AND
RECREATION GENERAL PURPOSE REVENUE] |
| 5. | FRAMEWORK FOR OUR FUTURE: ACTIONS TO ACHIEVE BOLD
CLIMATE ACTION AT THE COUNTY OF SAN DIEGO |
| 6. | NON-AGENDA PUBLIC COMMUNICATION |

BUSINESS IMPACT STATEMENT

N/A

ACTION:

ON MOTION of Supervisor Desmond, seconded by Supervisor Vargas, the Board of Supervisors took action as recommended, adopting Resolution No. 21-009 entitled: RESOLUTION OF THE BOARD OF SUPERVISORS OF THE COUNTY OF SAN DIEGO APPROVING THE APPLICATION FOR STATEWIDE PARK DEVELOPMENT AND COMMUNITY REVITALIZATION PROGRAM GRANT FUNDS.

AYES: Vargas, Anderson, Lawson-Remer, Fletcher, Desmond

5.

SUBJECT: FRAMEWORK FOR OUR FUTURE: ACTIONS TO ACHIEVE BOLD CLIMATE ACTION AT THE COUNTY OF SAN DIEGO (DISTRICTS: ALL)

OVERVIEW

We need to take bold steps to address climate change in San Diego County. Climate change is already impacting our communities, and disproportionately affects those who have contributed the least to our collective problem, furthering climate injustice.

San Diego County needs to do our part. The 2011 General Plan included the development of a Climate Action Plan as mitigation for greenhouse gas (GHG) emissions associated with the build-out of the General Plan. Now, almost a decade later, the County still lacks a Climate Action Plan and other regional strategies to address climate justice, climate resilience, mitigation, and adaptation. County staff have begun the environmental review to create a new Climate Action Plan, but this board letter serves to identify and prioritize those climate action objectives we expect.

To achieve bold climate action, we are asking the Chief Administrative Officer to develop a Climate Action Plan that meets and exceeds state mandates and guides our region toward Zero Carbon. The Climate Action Plan will be comprehensive and legally enforceable, use updated data and modeling, and will not rely on the purchase of carbon offsets to meet emission reduction targets. It will be shaped by community input and center environmental justice.

This will just be the first of many actions that support a Framework for Our Future to tackle climate change in San Diego County.

RECOMMENDATION(S)

CHAIR NATHAN FLETCHER & SUPERVISOR TERRA LAWSON-REMER

Direct the Chief Administrative Officer to:

1. Develop a Climate Action Plan for the County of San Diego that is comprehensive and legally enforceable, does not rely on the purchase of carbon offsets to meet emission reduction targets, uses updated data and modeling, emphasizing environmental justice and equity, is shaped by community input, and will achieve at a minimum Senate Bill 32 greenhouse gas emissions reductions of 40% below the 1990 level by 2030 and establish actions to meet a goal of net zero carbon emissions by 2045 (in line with Executive Order B-55-18).

2. Conduct stakeholder engagement, hold public hearings, and undertake environmental review.
3. Report back to the Board bi-monthly with progress.

FISCAL IMPACT

There is no fiscal impact associated with these recommendations.

BUSINESS IMPACT STATEMENT

N/A

ACTION:

ON MOTION of Supervisor Fletcher, seconded by Supervisor Vargas, the Board of Supervisors took action as recommended, directing the Chief Administrative Officer to:

1. Develop a Climate Action Plan for the County of San Diego that is comprehensive and legally enforceable, does not rely on the purchase of carbon offsets to meet emission reduction targets, uses updated data and modeling, sets clear goals and measurable metrics that shows how we are ensuring environmental justice and equity, is shaped by community input, and will meet and exceed Senate Bill 32 greenhouse gas emissions reductions of 40% below the 1990 level by 2030 and establish actions to meet a goal of net zero carbon emissions by 2035-2045 (in line with Executive Order B-55-18).
2. Conduct stakeholder engagement, hold public hearings, and undertake environmental review.
3. Report back to the Board bi-monthly with progress.

AYES: Vargas, Anderson, Lawson-Remer, Fletcher, Desmond

6. SUBJECT: NON-AGENDA PUBLIC COMMUNICATION (DISTRICTS: ALL)

OVERVIEW

Kathleen Lippitt provided comments to the Board regarding smoke free housing.

Jadon James provided comments to the Board regarding racism.

ACTION:

Heard, Referred to the Chief Administrative Officer.

Exhibit J

Alpine Revitalization Steering Committee –January 24, 2019

COMMITTEE: Parks and Recreation

Activity Level	Item #	Project	Action	Lead Staff	Funding Source	Status
A	108	Creation of Parks and Recreation Master Plan for Alpine	Community members to draft "Parks Master Plan for Alpine" to identify current inventory of parks and prioritize future development needs and desires. Once drafted, Parks Master Plan will be heavily circulated for input of various sectors of community.	George Barnett (619) 659-0349 Work would be intended as joint effort with the ACPG Parks Subcommittee.	N/A	Work not yet started as efforts focused on finding suitable land for active sports.
	108a	30-acre park	1) Find & secure a parkland site. 2) Canvass stakeholders as to active park facilities wishes. 3) Work with County on design concepts. Awaiting contact from County Parks.	George Barnett, Chair (619) 659-0345 County Staff: Bill Saunier; Judy Tjiong-Pietrzak	Land donations. Fund raising & grant applications. Facilities donations. (professional sports franchises) Prop H bond funds & State matching funds, if joint development with GUHSD, County &/or Alpine.	No large sites in Alpine have been identified through over a decade of searching. Recommend removing this item from the matrix. Refer to item #103 above. The County has identified approximately 98 acres of vacant land available for purchase in Alpine. The property will be acquired to develop a portion as an active park and to conserve a substantial portion of the property as open space. Second hearing is set for February 13, 2019.

Alpine Revitalization Steering Committee –January 24, 2019

COMMITTEE: Parks and Recreation

Activity Level	Item #	Project	Action	Lead Staff	Funding Source	Status
	108c	Improve Joan MacQueen Middle School sports facilities.	Action completed.	George Barnett, Chair (619) 659-0345	Alpine PLDO funds, Neighborhood Reinvestment Program grant application, and multiple donation sources.	Alpine Education Foundation and the ACPG Parks & Recs Subcommittee jointly developed a comprehensive master plan to upgrade the dirt playing fields to mostly artificial turf. The plan was endorsed by the ACPG. Alpine Union School District has assumed a lead agency role in executing this project. PRD's view of this project is unknown as meetings have apparently been held in the community without ACPG or Revitalization participation. Recommend removing this item from the matrix to the list of completed projects.
	108d	Conversion of 3.24-acre property formerly donated to the County for a Sheriff's substation. Add to the area of interest Tom Dyke's adjoining ~7-acre industrial parcel.	No action foreseen for the near term.	George Barnett, Chair (619) 659-0345		PRD advise that a letter of interest has now been sent to the property owner, but there has been no reply. The property owner first offered an interest to negotiate over a decade ago and had not been contacted until about a month or so ago. Unofficial information is that the property remains under long term lease for the ongoing 5-year SDGE "wood to steel" project and that potential industrial buyers have expressed a purchase interest. Recommend removing this item since DPR has identified another property for purchase.

Alpine Revitalization Steering Committee –January 24, 2019

COMMITTEE: Parks and Recreation

Activity Level	Item #	Project	Action	Lead Staff	Funding Source	Status
A	109	Parks and Trail -Increase active and passive parks and ensures protection of Wright's Field. Establish a trail system between parks and neighborhoods to encourage pedestrian and alternative modes of transportation.	1) APG and Parks Sub-committee continue to work with the County on park site.	The effort would be partnered with ACPG Parks. Trails and Conservation Subcommittee Chair, Travis Lyon & Jim Easterling.	Community Development Block Grants Developer Fees	See # 103 Action deferred as all resources directed at finding an active sports site of decent size.
	109a	Trails – staging area	Need further consultation with APG Trails, APG Parks and Parks & Recreation (Passive) Committees to determine requirements and responsibilities for this project.		To be Determined.	Plan staging areas or trail markings at select locations in Alpine. No action on this item. See item 109 above.



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Attorney
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May 18, 2022

Via Electronic Mail Only

Ms. Anna Prowant
Land Use/Environmental Planner III
San Diego County
Department of Parks and Recreation
5500 Overland Avenue, Suite 410
San Diego, CA 92123
E-Mail: CountyParksCEQA@sdcounty.ca.gov

Re: Comments re Environmental Impact Report for the Alpine Park Project
(SCH No. 2021030196)

Dear Ms. Prowant:

On behalf of the Cleveland National Forest Foundation ("CNFF") we submit these comments on the proposed Alpine Park Project ("Project") and the associated Environmental Impact Report ("EIR"). For the reasons set forth below, the County has failed to demonstrate a need for the Project. The Project is oversized, incompatible with the rural character of Alpine, would substantially increase overall vehicle miles travelled ("VMT"), and would convert open space in an area with substantial sensitive biological resources to an active recreational facility.

The project proposes construction of a sports complex immediately adjacent to Wrights Field, a 230-acre nature reserve. The Project, which would develop 25 acres of various recreational uses, would include parking spaces for up to 275 vehicles. A sports complex of this size in a rural setting would not only serve Alpine area residents, but would attract people from distant areas as well, resulting in increased VMT and corresponding increases in greenhouse gas emissions.

Importantly, the Project is fundamentally inconsistent with SANDAG's Regional Plan and Sustainable Communities Strategy ("SCS"), which includes among its strategies to "focus housing and job growth in the urbanized areas where there is existing and planned transportation" and to "protect the environment and help ensure the success of smart growth land

use policies by *preserving sensitive habitat, open space, cultural resources, and farmland.*”¹ The preeminent goal and performance target of SANDAG’s Regional Plan, as mandated by SB 375, is to reduce per-capita CO2 emissions from cars and light-duty trucks to meet the California Air Resources Board’s 2020 and 2035 reduction targets for the region. Id.

In addition, the July 2020 Regional House Needs Allocation (“RHNA”) Plan reduced the housing allocation for the 2021-2029 planning cycle in the County’s unincorporated areas by 15,000 units compared to the allocation in the previous cycle. The units were transferred from the rural unincorporated areas to already urbanized areas that have established infrastructure, transit corridors, and jobs for the express reasons of making housing and transportation more affordable and to reduce VMT and greenhouse gas emissions. This means that compliance with SANDAG’s Regional Plan and the RHNA would limit development in rural lands in and adjacent to forest lands, such as Alpine.

The Alpine Park Project was purportedly planned to accommodate population growth and demographic changes anticipated in the area. However, the most recent Regional Plan, indicates otherwise. SANDAG adopted the 2021 Regional Plan² and certified the associated EIR,³ both of which incorporate the Series 14 Regional Growth Forecast which SANDAG adopted in October 2019.⁴ The Regional Plan shows a drastic reduction in the projected growth in the County’s unincorporated areas.

Specifically, whereas SANDAG’s Series 13 housing forecast calculated an increase of 51,123 housing units in the unincorporated county between 2012 and 2050,⁵ SANDAG’s current Series 14 housing forecast *reduces* this projected growth to an increase of just 7,419 *housing units* in all unincorporated areas countywide during a similar timeframe (2021 Regional Plan, Appendix F at p. F-13). This reduction in population growth in the county’s unincorporated areas consequently means the Project is not necessary to accommodate growth, because the projected growth rate for the Alpine area is now substantially reduced.

¹ SANDAG 2015 Regional Plan at 26 (emphasis added), available at https://sdforward.com/pdfs/Final_PDFs/Chapter2_A_Strategy_for_Sustainability.pdf (last accessed January 14, 2022).

² Available at <https://sdforward.com/mobility-planning/2021-regional-plan>, last visited January 12, 2022.

³ Available at <https://sdforward.com/mobility-planning/eir/>, last visited January 12, 2022.

⁴ Available at https://sdforward.com/docs/default-source/final-2021-regional-plan/appendix-f---regional-growth-forecast-and-scs-land-use-pattern.pdf?sfvrsn=8fc1fd65_2, last visited January 12, 2022.

⁵ SANDAG Series 13 Regional Growth Forecast at p. 8, available at https://www.sdforward.com/pdfs/Final_PDFs/AppendixJ.pdf, last visited January 12, 2022.

Ms. Anna Prowant
May 18, 2022
Page 3

In brief, in order to be consistent with SANDAG's 2021 Regional Plan and Series 14 forecast and RHNA, the County will have to *reduce* Alpine's housing allocation from the current General Plan, which will result in significantly less population growth in the Alpine area. Based on the foregoing, there no reasonable argument supporting the need for a park project of the proposed size.

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP

A handwritten signature in dark ink, appearing to read "JPetta", is written over a light blue circular stamp.

Joseph "Seph" Petta

1508249.1



Comments on the Draft Recirculated Environmental Impact Report will now be accepted through February 28th, 2023 until 5:00 P.M. Comments on this Draft Recirculated Environmental Impact Report must be sent to CountyParksCEQA@sdcounty.ca.gov

County of San Diego
Department of Parks and Recreation
5500 Overland Avenue, Suite 410
San Diego, CA 92123
CountyParksCEQA@sdcounty.ca.gov

February 28, 2023

Re: Draft Recirculated Environmental Impact Report for The Alpine Park Project

Dear Anna Prowant,

O11-1

Thank you for the opportunity to comment on the Draft Recirculated Environmental Impact Report for The Alpine Park Project (DREIR). The San Diego Audubon Society (SDAS) is a 3,000+ member non-profit organization with a mission to foster the protection and appreciation of birds, other wildlife, and their habitats, through education and study, and to advocate for a cleaner, healthier environment. We have been involved in conserving, restoring, managing, and advocating for wildlife and their habitat in the San Diego region since 1948. We provide the following comments that address significant impacts from the trail design to sensitive plants and wildlife.

O11-2

The trail system design for the project hasn't changed from the first circulated EIR, therefore it still causes significant impacts to special status plants with mitigation measures either absent or ineffective. The term "Trail System" is used seven times in the Biological Section with no explanation what the trail system is designed to accomplish. A few sentences on page 4.4-46 are at odds with a design that directs an increased number of park trail users, with 250 new parking spaces, into Wright's Field. The below will point out the following identifiable impacts: equestrian manure and invasive plant introduction, increased public presence into Wrights Field, special status plant impacts, QCO host plant impacts, CAGN vegetation impacts, and lack of an Invasive Plant Management Plan.

O11-3

Section Operation, Page 4.4-29, describes a Manure Management Plan (MMP) **would be prepared** for the project to control disease vectors and pests. It then states that **it is anticipated** that long-term impacts would be reduced compared to baseline conditions. The issue is the MMP is not described in this EIR, nor what baseline conditions are to be used for comparison. The expectation provided is a volunteer and two park rangers will eliminate all expected significant impacts for the project description of a 25-acre active park and 70 acres of open space/preserve. This is an unreasonable conclusion. **Can the MMP and baseline conditions for comparison be provided in the DREIR for vetting to control disease vectors and pests?**

O11-4

Section Operation, Page 4.4.46, states, "Although anthropogenic presence **is likely to increase** through construction of Alpine Park, measures have been sought to reduce impacts on the sensitive natural



- O11-4 cont. communities in the adjacent open space/preserve.” The anthropogenic presence **will absolutely increase** and the measures to reduce impacts are not described in this section or directed to where they could be found. It is also unclear how the permanent live-in volunteer will further reduce indirect impacts on sensitive habitats by their mere presence. **Can this section of the DREIR be updated to properly describe increased anthropogenic impacts by the project and what detailed measures will be used to reduce indirect impacts and what authority the volunteer will use to protect sensitive natural communities in the adjacent open space/preserve?**
- O11-5 The following section, Impacts on Wright’s Field, describes increased trail usage would have the potential to increase impacts on special-status plants and wildlife. The reasoning that these impacts will be less than significant are due to the distance from Alpine Park, that ballplayers/skateboarders won’t traverse, and a different entrance way into Wright’s Field are not well founded. The poorly designed trail system directs all Alpine Park trail users, including horses, into Wright’s Field increasing potential impacts to special status plants and wildlife habitat. **Can the Project trail system be redesigned to direct users away from sensitive habitats and entering into Wright’s Field?**
- O11-6 This section further describes impacts to special status plants by the increase of invasive plant propagules from the increased use of the project trail system. It fails to include this scenario from the horse’s hoofs from the equestrian staging area. This section, including Figure 4.4-2, also describes impacts to special status plants, “have the potential to be trampled from unauthorized users within the proposed Alpine Preserve, which could result in plant decline or mortality.” The presence of proposed additional signage, a live-in volunteer and park rangers to monitor are not end all viable solutions. Lack of proper mitigation strategies allows the project to be in conflict with LU-6.1 Environmental Sustainability, COS-2.1 Protection, Restoration and Enhancement, Conservation Goal Policy/Recommendation 6 and Policy/Recommendation 11. **Can these significant impacts to sensitive plant species be identified and mitigation measures such as trail redesign be provided for in the DREIR?**
- O11-7 Figure 4.4-3, Special Status Wildlife, shows the project trail system directs an increased amount of park users into Wright Field Preserve in direct contact of QCB host plants. Impacts are described on page 4.4-31,” QCB may be restricted from accessing these host plants, reducing the potential reproductive success of individuals.”, but are summarily dismissed. This expectation falls under County of San Diego Guidelines for Determining Significance, **4.D. The project would cause indirect impacts to levels that would likely harm sensitive habitats over the long term.** The trail design should direct park users away from QCP host plants. APM-BIO-1, MM-BIO-3 and MM-BIO-9 do not address project trail impacts to QCB host plants adjacent to the project site. **Can the DREIR be updated to identify impacts to QCB host plants by increased park users and provide a trail redesign to mitigate these significant impacts?**
- O11-8 Beyond trail use, impacts to special status plants are further identified on page 4.4-29, specifically “two Delicate clarkia individuals” and “fewer than 100 individual Palmer’s grapplinghook individuals were noted in 2019” It is stated that, “potential impacts would be less than significant because of the widespread nature of both species (San Diego Natural History Museum 2021). This conclusion does not match up with Section 4.4.4.2 Thresholds of Significance County of San Diego Guidelines for Determining Significance. It is in direct conflict with **Part 3.A The project would impact one or more individuals of a**



O11-8
cont.

species listed as federally or state endangered or threatened. Can the DREIR be updated to provide mitigation measures to significant impacts to Delicate clarkia and Palmer's grapplinghook individuals on a project level and not on a regional level?

O11-9

Section 4.4.4 Project Impact Analysis describes a Native Habitat Avoidance Area (NHAA). However, evidence provided in this EIR hardly describes such avoidance. This area is described as adjacent to the proposed equestrian staging area and designated as Permanent Impact in **Table 4.4-2, Summary of Project Components and Associated Impacts**. Threshold 5 on page 4.4-51 describes the new volunteer parking pad extends into the NHAA (Impact BIO-15). Measure APM-BIO-1 states Compensatory Mitigation, but this is not Habitat Avoidance with expected increased human/horse activities and volunteer parking pad. APM-BIO-1 is not sufficient mitigation to lessen the NHAA impacts too less than significant. **Can the DREIR be updated to provide achievable protections for identified special status plants in the NHAA?**

O11-10

The phrase "Invasive Plant Management" (IPM) is used once in the Special-Status Plant Species section, page 4.4-30 and "Invasive Plants" mentioned only twice more. This section conclusively states that long-term resource management by the county will mitigate significant impacts to special status plants. The absence of details in the IPM leads to a deferred mitigation strategy. Furthermore, additional foot and horse traffic, and equipment will bring large amounts of invasive plant seeds into the habitat area, especially but not exclusively near trails. Those seeds will then be spread by wind, water, and wildlife into other habitat areas including Wright's Field. A significant amount of seasonal weeding will be required each year to offset that additional impact to protect the wildlife resource value. Please specify what entity will perform that removal, manage, fund it, and establish the performance criteria. Additionally, what agency will monitor it, what authority will be able to make sure that it is adequately completed each year, and what protocols will be established to protect the natural areas. **Will the Project prepare a conclusive Invasive Plant Management Plan to address all project significant impacts to special status plants described in this letter?**

O11-11

In Section 1.4.12.3, Birds, the DEIR states unconvincingly a case for Coastal California Gnatcatcher (*Poliioptila californica californica*), (**CAGN**) non-presence at the project site by using phrases, "far eastern extent of the known range of CAGN", "possibly just east of the known current range for this species", and "elevation and related weather extremes of the site may preclude occupation". In Appendix D, the Biological Resources Report, **CAGN** Protocol Surveys states that only three surveys were performed in July of 2019 for 9 hours and 45 minutes (Table 3). A limited survey and conjecture statements are not a reasonable conclusion to have stated in Section 4.4.2.4, "...determined to have low potential to occur; therefore, impacts on these species are not evaluated in this EIR." The project BSA exists in a HCP, NCCP and the San Diego County MSCP. The CDFW- CNDDDB has **CAGN** records in the Alpine quadrant, as shown below. Moreover, Table 4.4-1 lists over 12 acres of Diegan Coastal Sage Scrub, **CAGN** habitat, in the BSA. Mitigation for an endangered species in protected habitat is required in the County of San Diego Guidelines for Determining Significance, **7.D. The project would not minimize and/or mitigate coastal sage scrub habitat loss in accordance with Section 4.3 of the NCCP Guidelines. Will the RDEIR be**

Fostering the protection and appreciation



of birds, other wildlife, and their habitats...

updated to identify impacts to **CAGN** and Diegan Coastal Sage Scrub vegetation to provide protection for an endangered species in protected habitat?

O11-11
cont.

CNDDB Species for Quad (99 records)											
Element_Type	Scientific_Name	Common_Name	Element_Code	Federal_Status	State_Status	CDFW_Status	CA_Rare_Plant_Rank	Quad_Code	Quad_Name	Data_Status	Taxonomic_Sort
12 Animals - Birds	Poliophtila californica	coastal California gnatcatcher	ASPB00001	Threatened	None	SSC	-	3211677	ALPINE	Mapped and Unprocessed	Animals - Birds - Poliophtila californica

In Section Mitigation Measures, MM-BIO-5, states mitigation for potentially significant impacts on sensitive nesting birds and raptors, “the County DPR shall avoid ground-disturbing activities during the bird breeding season in compliance with state and federal regulations regarding nesting birds.” Then in the very next paragraph, it states if this cannot be followed, a 72-hour nesting bird survey will take place instead of avoidance during breeding season. The mitigation measure has no validity if it can simply be ignored as this section suggests. **Can MM-BIO-5 be revised to state that ground-disturbing activities will not take place during breeding season and remove the alternative 72-hour nesting bird survey option?**

O11-12

O11-13

Thank you for the opportunity to comment on the Draft Recirculated Environmental Impact Report for The Alpine Park Project.

Sincerely,

James Peugh

Conservation Chair, San Diego Audubon

John Riedel

Conservation Committee, San Diego Audubon Society

From: [Frank Landis](#)
To: [CEQA CountyParks](#)
Subject: [External] Coalition comments on Alpine Park Project (SCH No. 2021030196)
Date: Tuesday, February 28, 2023 2:31:13 PM
Attachments: [Coalition comments on Alpine County Park RDEIR 20230228.pdf](#)
[Coalition comments on Alpine County Park DEIR 20211115.pdf](#)

Dear Ms. Prowant,

Please find attached comments on Alpine County Park project from CNPSSD, Sierra Club, and Environmental Center of San Diego. The two files are comments on the recirculated portions of the DEIR and 2021 comments on the DEIR as a whole, which you should already have.

O12-1

Please let me know that you received this email and can open the attachments.

Thank you for taking these comments. Please keep us informed about the project at conservation@cnpsd.org, franklandis03@yahoo.com, Ron.Askeland@gmail.com, and pjheatherington@gmail.com. Feel free to contact us with any questions or comments.

Sincerely,

Frank Landis,
Conservation Chair, CNPSSD



CALIFORNIA
NATIVE PLANT SOCIETY



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February 28, 2023

Anna Prowant
Biologist and Land Use/Environmental Planner III
Resource Management Division
County of San Diego, Parks and Recreation
5500 Overland Avenue, Suite 410, San Diego, CA 92123
By email to: CountyParksCEQA@sdcounty.ca.gov

RE: Recirculated Sections Alpine Park Project DEIR (SCH No. 2021030196)

Dear Ms. Prowant,

O12-2

Thank you for the opportunity to comment on the Alpine Park Project's ("Project") recirculated sections ("RDEIR") of the Draft Environmental Impact Report ("DEIR"). The San Diego Chapter of California Native Plant Society ("CNPS"), Sierra Club San Diego Chapter, and Environmental Center of San Diego are united in this commentary on the Alpine Park DEIR. Collectively we have over 15,000 members in San Diego County.

While we appreciate the additional analysis and the long-delayed inclusion of the community-requested Alternative Five, we still find the DEIR to be a sorely inadequate project description, leaving both the public and the County Board of Supervisors guessing the near-and long-term outcomes of numerous project impacts. Our detailed comments are given below, after our general critique.

O12-3

Critically, the RDEIR fails to include any design revisions on the preferred alternative, although two redesigns (volunteer pad and equestrian staging area) are mentioned in the text. Therefore, all the critiques of the inadequacies of the preferred design in our 2021 letter (attached) remain relevant.

O12-4

Equally critically, there is no Resource Management Plan ("RMP"), there is no Habitat Restoration and Enhancement Plan ("HREP") there is no Invasive Species Management Plan ("ISMP"), nor is there a Manure Management Plan ("MMP"). All of these are required to make the mitigations work. **Why have they not been written in the year since the DEIR first came out? Deferring essential mitigations is inappropriate, as discussed in the 2021 letter.**

O12-5

This Project has suffered from trying to be both a regional and community park. The preferred alternative is regional, with public input solicited from all over San Diego County, with facilities designed for regional needs. However, the Project's stated objectives have been to provide benefits only to Alpine. The objectives appear based on unsupported claims that Alpine residents lack access to parks, which they do not; that Alpine lacks park facilities, when in fact Alpine has multiple, underused facilities for these amenities; and that the community wants the preferred alternative, when 60 percent of Alpine residents polled said they wanted something like Alternative 5 (see previous letter, attached, for discussion of all these claims).

O12-6	<p>The problem with cramming a regional park's worth of maintenance and funding needs into a community park should be obvious. Why should a community park require two dedicated rangers and an onsite volunteer? Why does it need millions of dollars in excavation and separate projects for water, sewage, and sidewalk construction? Why does it need so much mitigation for the impacts it causes? These are not just rhetorical questions. The County will inevitably face recessions and budget shortfalls in the years to come, and park staffing and maintenance is among the first things to be cut. As designed, the Project requires a generous operating budget, multiple full time employees, water regardless of regional drought issues, and substantial maintenance to serve its functions. Otherwise, it will become another pit of deferred maintenance, waiting in perpetuity for whenever resources become available. Since the Project is, from its objectives, a community-level park, why should anyone expect it to always receive the resources of a larger park, even if it needs them?</p>
O12-7	<p>Yes, other people in the County do not have access to parks like the one proposed. But they need parks built closer to them, not in Alpine. Park investment should go where there are no recreation opportunities, not to places like Alpine that have underutilized facilities.</p> <p>What to do in Alpine County Park instead?</p>
O12-8	<ul style="list-style-type: none"> Why not re-engineer the curb on South Grade Road where the existing ad hoc parking lot is, to make a simple driveway accessible to regular cars, and to encourage people to park in a single area? How about moving some boulders to keep the informal parking lot from growing further and to prevent people driving onto the grassland? Why not scrape the unpaved lot after rainy years to minimize erosion and encourage people to park only there? This provides stable access for Wright's Field, which is needed. It can remain dirt, which will appropriately keep people out of the park when the soil is wet.
O12-9	<ul style="list-style-type: none"> Why not leave the to-be-developed native grassland in its current state and wait 15 years? If Alpine has grown to the point that it needs more local park space, reconsider developing the site using technology that is genuinely carbon neutral. Regardless, in 15 years, revisit the decision to keep the site as it is or build a park that meets the needs of Alpine and the County at that time, because it's superfluous now. Why not consider that the site as it exists may be more useful to the County as a Tier I mitigation bank and/or a carbon sequestration area, and not destroy those sorely needed functions?
O12-10	<ul style="list-style-type: none"> Why not write a Resource Management Plan for the entire Park? Why not include an Invasive Species Management Plan? Would a Manure Management Plan or a Habitat Restoration and Enhancement Plan be necessary in a less developed park? If so, why not write them? If the space is minimally developed, most of the mitigations proposed in the DEIR and the RDEIR will be unnecessary, and these plans will be comparatively easy to write.
O12-11	<ul style="list-style-type: none"> In other words, why not follow Alternative Five? In a time of rapid change and reorganization, we do not need another heavily engineered, big lawn park to maintain. If the proposed park is built, either it will become a regional destination, in which case Alpine residents will be crowded out, or it will not be used much more than the site already is, in which case it will be a white elephant with a maintenance backlog due to the expansive soils and climate change. Or both sequentially. By the time Alpine grows enough to generate 500 trips per day as a local park, the Preferred Project will be dilapidated and need massive rebuilding to meet new, carbon-neutral land use codes. Why not skip the white elephant stage and wait to see what the actual, long-term need is?

- O12-12 • **If the County has millions to spend on parks, why not prioritize those funds to support environmental justice needs in less developed communities?** Residents of Alpine seem to agree with this idea. **Why not let them be generous?**
 . Our specific comments on the recirculated project are given below.

Native Plant and Vegetation Issues (RDEIR section 4.4)

Mapping of Engelmann Oak Woodland

- O12-13 There are three levels of issues here. First, especially within the Project boundary, the mapping of Engelmann oak vegetation seems to be limited to the area around the oaks (*Quercus engelmannii*) themselves, with even a few feet between trees mapped as buckwheat scrub. This is problematic for two reasons. First, vegetation units are of minimum size, and for trees blocs of 20 meters square or more are appropriate units. Single trees are not. Also, open Engelmann oak woodlands have <50% cover by Engelmann oaks, which is not what is mapped with these polka dots. Every area where there is 30-50% oak canopy should be mapped as open Engelmann oak woodland.

- O12-14 Second, from the *Manual of California Vegetation, Second Edition*, Engelmann oak vegetation can have an understory of grass, coastal sage scrub, chaparral, or a mix. Comparing Figure 4.4-1 with Google Earth, it appears possible that there are a number of Engelmann oaks within the “coastal sage scrub-chaparral transition.” If that is the case, some parts of that may need to be mapped as open Engelmann oak woodland.

- O12-15 Third, Englemann oak woodland is a Tier I vegetation type, while buckwheat scrub is a Tier II vegetation type. It is therefore troubling that the oaks in the Project area are mapped as not vegetation, because everything else around them is mapped as buckwheat scrub and subject to less mitigation. **Please map vegetation consistently. This may well mean that the Project has unmitigated impacts to Engelmann oak woodland.**

Impacts to Wright’s Field

- O12-16 The conclusion that operational impacts from the Alpine Park would not have a significant impact on Wright's Field because it's 600 feet away is a poor argument. The RDEIR states (p. 4.4-29). "However, the proposed Alpine Park would be approximately 600 to 800 feet away from the eastern edge of Wright’s Field. At that distance, impacts from operation of the active park and formalization of the trails would dissipate considerably and be considered less than significant..." Given that most of the trails connect to Wright’s Field and even small children can walk that 600 feet (from on-site observation), this is ludicrous. It is even more ludicrous because the shortest and safest way for children to get from Joan McQueen Middle School or Boulder Oaks Elementary is across Wright’s Field. Indeed, Back Country Land Trust has discussed modifying trails in Wright’s Field to deal with increased foot and bike traffic from the west, where the schools are.

- O12-17 **The Project’s indirect impacts to Wright’s Field have to be analyzed and mitigated.** At a time when the County is trying to cut Vehicle Miles Travelled and people of all ages traverse Wright’s Field as a matter of course, why assume that people using the developed park will only drive there? This is not a future the County is planning for.

Tier I Mitigation

O12-18

First, MM-BIO-10 prescribes roughly 30 acres of Tier I mitigation for the roughly 15 acres of impacts to native grassland. This measures states (p. 4.4-47) "Success criteria established in that HREP will include achieving at least a 5 percent absolute cover of purple needlegrass within restoration areas while retaining cover and species composition similar to that of the native forbs currently present within non-native grassland areas on-site." Although sources vary on the minimum percentage of native grass cover for mapping native grassland, the DEIR references the Draft Vegetation Communities of San Diego County (Oberbauer et al 2008) which states that "The percentage cover of native species at any one time may be quite low, but is considered native grassland if 20% aerial cover of native species is present." **Therefore, the MM-BIO-10 success criteria should be raised from a goal of 5 percent native grass cover to 20 percent.**

O12-19

Second, Tier I habitat mitigation includes restoring 7.41 acres of habitat on Wright's Field. No additional detail is provided about what type of habitat will be created, where within Wright's Field it will be added, the feasibility of this, or a restoration plan with monitoring, management, and success criteria. **Will the RMP address this offsite restoration and long-term management? We don't know because there is no RMP. The DEIR needs to include a detailed off-site restoration plan as well as a RMP**

Trail System Issues

O12-20

The trail system design for the project has not changed from the DEIR. The trails left open cause significant and unmitigated impacts to special status plants, as shown below. The term "Trail System" is used seven times in the Biological Section with no explanation what the trail system is designed to accomplish. The language on RDEIR page 4.4-46 is problematic in multiple ways:


- How will trails be closed? Some of them cross annual grassland, and most have no suitable brush nearby for brushing them closed. Is signage presumed to be sufficient?
- The "formalized" trail system forces walkers, dog-walkers, families, parents with strollers or small children, bikers, and equestrians onto trails that in some cases are currently only two feet wide. What are the biological impacts of increased, two-way traffic and the likely widening of these trails? What are the safety impacts of forcing so many users to share these trails with two-way traffic?
- How will enforcement work? Will County employees and volunteers be given eBikes to chase down scofflaws riding on closed trails? Will they issue citations or confiscate bikes? Is there a point at which chasing down scofflaws might cause more harm than good?
- What is the point of the trail system? It does little to steer people away from sensitive plants and animal habitat. It loops into Wright's Field, but crucially ignores some major established connections between the properties, thereby tempting people to continue to use informal trails visible on Google Earth in 1990s imagery. And as noted above, if followed, it forces more people onto narrower trails. **What is this effort supposed to improve about the Project? How will this improvement be quantified? Will the improvements outweigh the impacts, especially from trail widening?**

O12-21

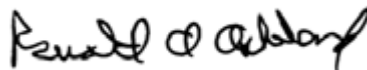
Lack of proper mitigation strategies allows the project to be in conflict with LU-6.1 Environmental Sustainability, COS-2.1 Protection, Restoration and Enhancement, Conservation

- O12-21 cont. Goal Policy/Recommendation 6 and Policy/Recommendation 11. Can these significant impacts to sensitive plant species be identified and mitigation measures be provided for in this EIR?
- O12-22 Second, Figure 4.4-3 and others show the project trail system directs an increased amount of park users into Wright Field Preserve in direct contact with sensitive plants and Quino Checkerspot Butterfly (QCB, *Euphydryas editha quino*) host plants. Impacts are described on page 4.4-31,” QCB may be restricted from accessing these host plants, reducing the potential reproductive success of individuals.”, but are summarily dismissed. This expectation falls under County of San Diego Guidelines for Determining Significance, **4.D. The project would cause indirect impacts to levels that would likely harm sensitive habitats over the long term.** The trail design should direct park users away from QCB host plants. APM-BIO-1, MM-BIO-3 and MM-BIO-9 need to be modified to address project trail impacts to QCB host plants adjacent to the project site.
- O12-23 Beyond trail use, impacts to special status plants are further identified on page 4.4-29, specifically “two Delicate clarkia [*Clarkia delicata*, CRPR list 1B] individuals” and “fewer than 100 individual Palmer’s grapplinghook [*Harpagonella palmeri*, CRPR List 4] individuals were noted in 2019” It is stated that, “potential impacts would be less than significant because of the widespread nature of both species (San Diego Natural History Museum 2021). This conclusion does not match up with Section 4.4.4.2 Thresholds of Significance County of San Diego Guidelines for Determining Significance. **Since delicate clarkia is a list 1B species, impacts to it need to be mitigated within the Project, and impacts to all sensitive species must be properly mitigated.**
- O12-24 Thank you for taking these comments. Please keep us informed about the project at conservation@cnpssd.org, franklandis03@yahoo.com, Ron.Askeland@gmail.com, and pjheatherington@gmail.com. Feel free to contact us with any questions or comments, or to set up a meeting.

Stay safe,



Frank Landis, PhD
Conservation Chair, California Native Plant
Society, San Diego Chapter



Ron Askeland
Conservation Committee Chair
Sierra Club San Diego



Pamela Heatherington
Board of Directors, Environmental Center of San
Diego



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November 15, 2021

Anna Prowant
Biologist and Land Use/Environmental Planner III
Resource Management Division
County of San Diego, Parks and Recreation
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By email to: CountyParksCEQA@sdcounty.ca.gov

RE: Alpine Park Project (SCH No. 2021030196)

Dear Ms. Prowant,

Thank you for the opportunity to comment on the Alpine Park Project's ("Project") Draft Environmental Impact Report ("DEIR"). The San Diego Chapter of California Native Plant Society ("CNPS"), Sierra Club San Diego Chapter, and Environmental Center of San Diego are united in this commentary on the Alpine Park DEIR. Collectively we have over 15,000 members in San Diego County. We find the DEIR to be a sorely inadequate project description, leaving both the public and the County Board of Supervisors guessing the near-and long-term outcomes of numerous project impacts.

While some type of park on this site might be good, the material in the DEIR does not yet rise to the level of a finished design. It fails to meet its own (arbitrary) objectives, and the No Park Alternative better fulfills those same objectives. It is missing necessary analysis, and the DEIR fails to meet County goals to decarbonize, end extinction, and keep people safe from fire. Most importantly, it fails to include potential compromises that would garner broad-based community support while simultaneously meeting the objectives set for it. This is a work in process, not a finished product. It needs a massive rewrite, quite possibly with recirculation, before it goes forward in the CEQA process.

The Questionable Need for the Park

Per the DEIR, page 4.16-2 "According the County of San Diego Parks Master Plan (PMP), the County's minimum level of service standard for local parks is 3 acres per 1,000 residents, and 10 acres per 1,000 residents for regional parks (County of San Diego 2016). However, the goal identified in the 2011 San Diego County General Plan is 10 acres per 1,000 residents for local parks and 15 acres per 1,000 residents for regional parks (County of San Diego 2011a). The PMP minimum standard is an analytical tool for County DPR to determine where parks and recreational resources are needed, whereas the 2011 general plan establishes a goal for long-term park and recreational development. As of 2019, the Alpine Community Plan Area (CPA) has approximately 1.44 acres of local parkland per 1,000 residents, and no regional parkland. These totals do not include parks that are not owned by the County or for which there is no JEPA because, although they may meet some of the recreational needs of particular communities, access and use may be restricted."

Per worldview.com, Alpine's 2020 population is 14,878, so it needs 148 acres of local parkland and 222 acres of regional parkland. Per the DEIR, table 4.16-1 (p. 4.16-1, below), Alpine residents have access to 202 acres of unencumbered local parkland at Wright's Field and 28,020 acres of regional parkland in the adjacent Cleveland National Forest (CNF). **Why was County ownership assumed as a precondition? Where in the PMP does it specify that what entity owns the parks matters?** Wright's Field Preserve operates under agreement with County DPR through the MSCP, and US National Forests are open to the public. **Why does the DEIR fail to analyze the contribution the Cleveland National Forest makes to Alpine.**

Figure 1 Table 4.16-1. Parks and Recreational Facilities within the Project Area

Park/Facility Name	Park Type	Existing Acreage
Boulder Oaks Neighborhood Park	Local	2
Joan MacQueen Middle School	JEPA ¹	12
Shadow Hill Elementary School	JEPA ¹	12
Wright's Field		202
Cleveland National Forest	Regional Park	28,020
Regional Park 28,020		
Total		28,248

¹Indicates that the park is in a Joint Exercise of Powers Agreement (JEPA), which means that the owner of the facility agrees to allow limited use of the facility by another entity, in this case the County of San Diego and its residents.

Based on the numbers, Alpine is not park-poor but a park-rich. This is borne out by evidence from Wright's Field. If Alpine is truly underserved for parkland, then anyone would expect that existing facilities would be heavily visited and seriously overused. Certainly anyone used to, say, the heavily visited Los Peñasquitos Canyon Preserve in the City of San Diego, would expect dozens to hundreds of the approximately 14,800 people in Alpine to be using Wright's Field, in line with the project proposing to accommodate 500 visitors per day.

I (Landis) went to Wright's Field on Sunday, November 7, 2021 at 1100-1315. The day was clear, partially overcast, in the low 70s, and perfect hiking weather. We saw a total of seven cars parked along South Grade Road (not all at once), and fewer than 20 people, a third of whom were a single family with children. For most of our visit, no other humans were in sight. This is not an overused park. Figure 1 (next page) shows the empty parking lot and three cars across the street at 1:15 pm, when we left. Figures 2 and 3 (next page) show the kind of damage expected in an overused park, these from Los Peñasquitos, where I volunteer weekly.

The logic that parkland only counts if it is owned by the County is specious. By that logic I, a resident of Rancho Peñasquitos, live in a park-poor area, because the only county park nearby is a small part of Los Peñasquitos Canyon Preserve. The square miles of city parkland, Torrey Pines State Preserve, the beaches, and the land trust lands do not count. **Why should it matter whether a public park is controlled by federal, county, municipal authorities, or for that matter a land trust with an open access policy?**



Figure 1. Alpine County park parking lot area, empty, with 3 cars (including mine) parked on South Grade Road. This is not excessive use.



Figure 2. Concrete fence vandalized by two teenage boys at Del Mar Mesa. This is excessive use.



Figure 3. Wood fence vandalized at Del Mar Mesa, using a sawzall on the posts and beams, and a razor to deface the keep-out sign (white). This is also excessive use.



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Source: County of San Diego DPR, 2019



Figure 3.2
Proposed Active Park Concept Plan
Alpine Park Project

Second, why include the general plan goal COS-21.4 Regional Parks (p. 4.4-6), which requires “new regional parks to allow for a broad range of recreational activities and preserve special or unique natural or cultural features when present.” **Why is this regional park goal given as a justification for a local park?** Alpine has almost 100 times more regional parkland than it needs per the PMP. **Does this section even belong in the DEIR?**

The need for recreation at this site needs to be rethought. Two possible alternatives are given at the end. As for the project objectives, they are covered at the end as well.

Issues with the Proposed Design

The project design (DEIR Figure 3.2, previous page) conflicts with the geometry of the site and at least two parts of the DEIR, in that the project cannot not be built as shown if the Project is to implement its mitigation measures to deal with the site. Therefore, the Project Description (Chapter 3, especially Figure 3.2) needs to be revised to reflect the reality of the project.

First, the project site slopes, with approximately 50 feet of elevation between top in the north and bottom in the south. The highest point is very approximately at the community garden in Figure 3.2, and the site slopes at around a 3% grade both north and south from that ridge. The topographic lines in Figure 3.2 appear to show the slope in 1' increments. **Why are these not more obvious?**

The existing slope is proposed to be flattened out in several places, which is good, because a baseball diamond (#23) that slopes 6' across the field will be suboptimal for play, while the horse trailers being forced to load on a 3% slope (#19) will be awkward at best and lead to trouble if the horses are not trained for it.¹

However, the massive excavations necessary to flatten out the site are not shown in Figure 3.2, and that is a worse problem. **The site is proposed to be laced with cut and fill slopes, but where are they on Figure 3.2?** While ADA access is not a CNPS issue, one wonders how any wheeled seat, be it a wheelchair or a stroller, will handle the slopes. **Where will the access ramps be?**

CNPS is concerned about native plants, and the massive amount of grading is incompatible with the health and continued existence of the Engelmann oaks (*Quercus engelmannii*) and other existing trees on site. While the fill may avoid their trunks, damaging root systems will simply substitute a slow death for a quick one. Furthermore, the DEIR itself (p. 4.7-14) proposes, as mitigation for soil conditions: “[s]ite preparation should begin with the removal of existing improvements, vegetation, utility lines, asphalt, concrete, and other deleterious debris from areas to be graded. Tree stumps and roots should be removed to such a depth that organic material is generally not present. Clearing and grubbing should extend to the outside of the proposed excavation and fill areas. The debris and unsuitable material generated during clearing and grubbing should be removed from areas to be graded and disposed of at a legal dumpsite away from the project area, unless noted otherwise in [the report].” Since existing improvements, utility lines, asphalt, and concrete are largely absent from the site, this is obviously boilerplate, and its lack of customization shows a complete lack of care by whoever assembled the document. **How would the (p. 3-5) “21.75 acres of grading...with approximately 47,200 cubic yards of soil excavated, and approximately 5,750 cubic yards of**

¹ As an aside, a ranch-owning friend commented that most equestrians prefer to tie their horses to one side of the trailer while handling them, which requires an additional 6-8' of clearance. This is not shown in Figure 3-2, and halve the usable number of spaces in the equestrian staging area.

soil imported to the project” be reconfigured to retain existing trees, as required elsewhere in the DEIR?

Second, as discussed in the fire section below, the County fails to follow its own regulations concerning landscaping in a very high fire hazard zone. Therefore, along with the lack of cut and fill noted on the map, the placement of trees throughout the project certainly appears to be too dense and a fire hazard in an extreme wind driven wildfire. **What would a fire-resistant tree planting and landscape plan look like, in place of Figure 3.2?**

Third, the project site sits on what soil scientists call a vertisol, the unusual (for San Diego) Lusardi Formation with contains “unweathered granitic rock corestones ... and boulders” capped with at least three feet of heavy clay. (p. 4.7-2). “Vertisols are clayey soils [described as “expandable” in the DEIR], which have deep, wide cracks on some occasions during the year ... They shrink when dry and swell when moistened... Irrigation also presents special problems due to their low saturated hydraulic conductivity. Bypass flow in open cracks is the common situation. Because of their low permeability, irrigation of these soils may result in waterlogging and a buildup of salinity unless adequate artificial drainage is provided.”² In laymen’s terms, these soils crack when dry and pull off shoes when wet. If irrigated improperly they pond, ruining lawns and killing trees. If inadequately drained they build up salts, and if improperly engineered, they crack, cracking pavement and foundations, and creating water outflow channels that manifest as perched water tables in cut and fill slopes and berms.

The vertisol extends across Wright’s Field, which is why vernal pools and clay specialists like San Diego Thornmint (*Acanthomintha ilicifolia*) occur there. In design terms, dealing with the impermeable clay requires a massive system of drains that need to be visible in the plans. Compressing this clay for building purposes will make it impermeable, so water will flow laterally, effectively making perched water tables that will leak out of cut slopes and berms if not properly channeled. **Does this affect the park design? If so, what changes need to be made? Will water flowing along impermeable clay surfaces or subterranean cracks cause issues on Wright’s Field, on South Grade Road, or to neighbors north of the project? What will be done to prevent salt buildup? How will drainage issues be fixed? Will the soils significantly impact the County by creating an unending maintenance burden and continuous, if minor, property damage on-site? How much will this impact cost annually?**

In a related issue, the plan shows septic systems in this impermeable soil. **Where will the sewage go? How will it affect nearby plants and nearby people?**

Finally, the trails plan for the rest of the parcel ignores existing unauthorized trails, which can be seen under the map. While the DEIR states that one mile of trail will be retained and approximately 3,300 feet of unauthorized trail will be closed, even a two hour stroll made it obvious that there is more than 3,300 feet of unauthorized trail onsite already. Some of it is visible in Figure 3-2 above. **How much unauthorized trail is actually present onsite?**

All the mitigations and impacts need to be summarized in Figure 3-2, not hidden. What would the proposal actually look like with all required mitigation measures in place?

Procedural Issues with the CEQA process

Unfortunately, the DEIR presents serious procedural flaws. The area impacted by the proposed project is far bigger than area analyzed. It defers mitigation by failing to include a Resource Management Plan for the preserved part of the park, even though this is a basic objective of the Project. It also fails to analyze multiple other projects that either it proposes or

² <https://www.sciencedirect.com/topics/earth-and-planetary-sciences/vertisol>

are being proposed to meet the needs of the proposed project. Whether this is piecemealing of a bigger project or failure to analyze cumulative impacts is unclear. Finally, the County posted a video presentation of the project and claimed this action constituted a scoping meeting.

The first issue is that the Project is obviously designed to feed more people into the adjacent Wright's Field Preserve, but the direct, indirect, and cumulative impacts to Wright's Field are not analyzed or mitigated. The very design of the project is absurd without access to Wright's Field. Are dozens of equestrians and mountain bikers expected to show up to use a mile of already-existing trail? Of course not. Furthermore, the site is already an informal, and small, parking lot for Wright's Field. And the project assumes that neighbors will use trails in Wright's Field to access the project. Therefore, the Project's direct, indirect, and cumulative impacts on Wright's Field Preserve have to be analyzed and mitigated. **What are they?**

Second, the project fails to include a Resource Management Plan (RMP). Per P. 4.4-25, "Long-term management of the open space/preserve will also occur as part of the County's commitment to species conservation as a signatory to the Multiple Species Conservation Program (MSCP) and as outlined in a resource management plan that will be prepared for the project." To quote CEQA³:

"Where several measures are available to mitigate an impact, each should be discussed and the basis for selecting a particular measure should be identified. **Formulation of mitigation measures shall not be deferred until some future time** [emphasis added]. The specific details of a mitigation measure, however, may be developed after project approval when it is impractical or infeasible to include those details during the project's environmental review provided that the agency (1) commits itself to the mitigation, (2) adopts specific performance standards the mitigation will achieve, and (3) identifies the type(s) of potential action(s) that can feasibly achieve that performance standard and that will be considered, analyzed, and potentially incorporated in the mitigation measure."

Where are the specific performance standards for the RMP, and what potential actions can feasibly achieve those performance standards? The lack of an RMP is deferred mitigation. The RMP needs to be written, and it needs to also mitigate impacts from the Project to Wright's Field.

Although these provision of water and sewer services are CNPS issues only for the greenhouse gas emissions they emit, these also might be considered as deferred mitigation. Alternatively, the provision of water and sewer services are separate projects with separate CEQA analysis, in which case they were improperly excluded from the cumulative impacts analysis. **Are these part of the Project or not? Where and in what form will their impacts be analyzed? Is also deferred mitigation?**

At least two other projects were apparently omitted from the analysis of cumulative impacts. It is not clear whether these projects constitute piecemealing or unanalyzed cumulative impacts. Regardless, they only exist because of the current proposed project, so their cumulative impacts must be analyzed and mitigated. The first is that Back Country Land Trust ("BCLT") is reportedly working with SANDAG to come up with a plan to widen the trails on Wright's Field that feed into the Project site. The other project has been proposed by the Alpine Community Planning Group, to create a sidewalk along the north/west side of South Grade Road from Tavern Road, so that people can use it to walk to the project. Considering that the Project proposes to install tall berms along the edge of Tavern Road, the cumulative impacts of creating tall berms immediately beside a sidewalk along such a known dangerous stretch of road must be

³ CEQA 15126.4(a)(1)(B)

considered. **With berms, can pedestrians avoid out-of-control cars? Are other projects known to be in process in the area?**

Finally, the County chose to not hold a scoping meeting on this project. Instead, a video was posted on a website, and comments were solicited. **Is a posted video a meeting? If not, what can be done to remedy this clumsy kickoff for the Project?**

Issues with Plants

As mentioned in the previous section, the DEIR fails to include a Resource Management Plan. **Without an analysis of the trails onsite in an RMP, how can any trails plan be even proposed. This has a number of bases:**

- **What native plants are adjacent to which trails? How will trail closure affect the plants? Will they be cut down to brush trails closed? Will they be trampled by people going around closures?**
- **Which trails have invasive non-native plant species next to them? Will trail closure stop weeding from occurring, or will it prevent their further spread?**
- Mule deer, which are covered by the MSCP, use trails. **Are any trails used by mule deer?** If so, they cannot be closed, for humans (including mountain bikers) can readily follow deer trails, and efforts to close trails necessarily exclude deer.
- **What other wildlife uses with trails? Which will be affected by trail closure?**
- **Which trails are regularly used by people, and which are less used? Have trail users been interviewed about their views on which trails to close?**
- **Are any trails incorporated into first response plans by law enforcement or fire?** If so, they cannot be closed for public safety reasons.

The above questions all should have been asked, but weren't, in the messy failed trail closures on Del Mar Mesa, in which I (Landis) was intimately involved for a decade, as a trail volunteer who worked largely on attempting to close trails and protect rare plants and wildlife. Up until 2020, efforts to close trails caused far more damage to the plants and wildlife than the trails themselves did. In 2020, widespread illegal clearing along trails caused even more damage, but staff and volunteers were unavailable to stop it. There are six lessons from this ongoing mess:

- Illegal trails have a community, and trail closure is therefore more a process in influencing the community than one of building barriers.
- There is a fundamental asymmetry: Signs, fences and barriers are expensive, require contracts and budgets, and take time to install. Wire cutters cost around \$30, portable powered saws are less than \$100, and knives and razor blades for vandalizing signs are cheap. Some people (figure 2) use freely available rocks. It is cheaper to vandalize than to rebuild, and this asymmetry always favors the vandals.
- Vandalism and trespassing are not capital offenses. Most of the structures that would completely exclude people (especially mountain bikers wearing protective gear) could injure or kill them, as well as injuring or killing wildlife. This asymmetry always favors the trespassers, since they cannot legally be excluded by harmless barricades or other devices.
- Attempts by park departments to stop vandalism generally cause more harm than good, and often cause more resource damage than the illegal activity they seek to prevent.
- Prolonged law enforcement action (chasing down and fining trespassers) does decrease traffic, but it is expensive.

- Informal agreements among unauthorized users to limit activity so as to limit the damage caused by official backlash can work, so long as those agreements are honored. Sporadic enforcement normally leads to people lashing out and causing more vandalism elsewhere in the park as a protest.

Therefore: what data will the project proponents collect on the trail locations and conditions in the project area? How will trails be evaluated for closure or retention? What are the impacts of closure techniques? Who will maintain structures and closures? Will there be any law enforcement activity? Will there be informal social activity to rein in vandals? Will the onsite park volunteer be expected to carry out enforcement duties? If not, who? Are unauthorized trails proliferating in the area? Stable? Decreasing? How will adding 500 people/day change the rate of trail proliferation?

This is what need needs to feed into a Resource Management Plan, one that contains applied recreation ecology. **Why weren't these studies completed, and a RMP written for the DEIR? Until the RMP is written, biological impacts remain unknown and unmitigated.**

Second, the invasive plant management is problematic. On page 4.4-19, it states "Invasive plant management along the edges of the trails will be a management focus for the County during the long-term resource management associated with the open space preserve. As a result, these activities would not present a significant impact on the regional long-term survival of special-status plants present on site." The goal can only be accomplished if action items and performance standards are specified and measured. A "management focus" will just be ignored unless there are specific requirements. **What are those requirements? What cover of non-natives can be maintained? Will Cal-IPC listed plants be targeted for elimination? How will additional weeds be added to the target list? Without actionable details, this impact cannot be mitigated.**

Third, table 4.4-4 notes 11.73 acres of offsite mitigation through the purchase of credits or land acquisition. **Where and how will this offsite mitigation occur? Is this also deferred mitigation?** Offsite mitigation options need to be presented to demonstrate this mitigation is feasible and sufficient. Language needs to be added stating that offsite credit purchase or land acquisition must be finalized prior to project approval.

Among other commenters, CDFW commented on the NOP that they want to see "[a] discussion 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 an NCCP)." Table 1-2 (summary of NOP comments) suggests that this item is addressed in Section 4.4. **Where is it discussed?** We could not find a discussion of the indirect impacts from increased access through Wright's Field as a result of the project.

Finally, CNPS has been concerned for years about the spread of water-molds (*Phytophthora* species, pronounced *Fi-toff-thor-a*) through infected nursery stock being planted out in restoration and revegetation projects. This has been a particular problem for oaks, as Sudden oak Death is caused by *Phytophthora ramorum*. The problem is not limited to oaks, as there are upwards of 100 pathogenic water molds known from nurseries and outplantings, and virtually any plant can be infected by some water mold. **We strongly recommend, as part of mitigation MM-BIO-3, that all plants, especially all native species used for restoration plantings in native vegetation, be tested and certified to be *Phytophthora* free.** CNPS has put together a web-page (<https://sites.google.com/site/cnpsphytophthoraresources/>) on the issue in conjunction with native plant nurseries throughout the state. Local nurseries should be aware of

the issue and be willing to cooperate in this request. Planting clean plants will keep costs down, as replanting gets expensive and controlling a spreading water mold infestation is extremely expensive.

Wildfire Issues

The analysis of fire risk under hazards is problematic in two unfortunately common ways. First, it asserts without substantial evidence that following fire codes mitigate the risk below level of significance, and second, it fails to follow the County's own regulations for fire-safe landscaping. Finally, proposes to vastly increase the number of people on the parcel and using South Grade Road, while asserting without evidence that this will not be a problem. Substantial evidence is needed to back up these assertions. **Where is that evidence?**

First, the question of concern is asked in DEIR section 4.9 CEQA Appendix G, Question IX (e): "IX. Hazards and hazardous materials. Would the project... g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?" Since structures are proposed on the site, the project is proposed to bring in 500 people/day to the site, and the site is in the CalFire Very High Fire Hazard Zone, the answer is that yes, there is a serious potential impact. The question then becomes whether it can be mitigated. The DEIR asserted that preventing campfires and constructing buildings to "fire resistive" code was sufficient to mitigate the impacts below significance. If only this were sufficient. Too many extreme, wind-driven wildfires have shown the problems clearly.

First, it is worth pointing out that building anything to code is "fire resistive" not "fireproof." Any number of homes built to code burned in the Thomas, Woolsey, and Paradise fires. Part of the reason for that is inherent in the building code, which reads as follows: "2019 California Fire Code, Title 24, Part 9, Section 4901.2 Purpose: 'The purpose of this code is to provide minimum standards to increase the ability of a building to resist the intrusion of a flame or burning embers being projected by a vegetation fire and contributes to a systematic reduction in conflagration losses through the use of performance and prescriptive requirements.' Note these are **minimum standards**. While necessary, they are not sufficient to mitigate risk to life and structures, as we find in every extreme, wind-driven fire. **Will buildings on site be built to code, or exceeding code? If built to code, what is the remaining risk that needs to be mitigated? Or is the County expected to periodically rebuild? If built exceeding code, what additional features will be added, and how will they reduce risk below significance? What will be done to guarantee that the onsite volunteer living onsite (in a personal trailer?) will be safe from fire?**

Second, the County on October 20, 2021 passed an update to County regulations section 68.404. Among other things, these prohibit plants taller than 6" within 5' of buildings, prohibit groundcover taller than 6 to 18 inches within 50 feet buildings, require at least 10' between tree crowns within 50' of buildings, and require vegetation density to be "sparse" 0-5' from buildings "moderate" 5-50' out from buildings, and "No more than 50% of square footage" 50-100' from buildings. To put it very bluntly, this is not what is shown in Figure 3.2. There, trees overlap buildings and there is grass (not sparse plantings) right up to the proposed shade sail, baseball field buildings, and volunteer pad.

Worse, the project proposes to clear fuel modification zones into the land preserved under the MSCP, rather than accommodating fuel management onsite (p. 4.9-22). This is less than every single developer is required to do, especially adjacent to MSCP land. As noted in the previous paragraph, the park does not follow fire safe landscaping rules inside its boundary

either. **How can the park be redesigned to have both fire safe landscaping within its footprint and to accommodate Brush Management Zones within its footprint, as the County routinely requires developers to do in Very High Fire Hazard Zones and when building adjacent to preserved lands?**

Also, (p. 4.9-22) “Facility Fire-Safe Design. County DPR shall design elements of the project to reduce risk to users and to the area, including fire-resistive approved landscaping, areas that can serve as Temporary Safe Refuge Areas, safe ingress and egress, and a fire-resistive equestrian facility.” **How are temporary refuge areas and safe ingress and egress associated with a parking lot that is entirely lined with trees on all sides? How are people expected to get in or out if the trees catch fire?**

Third, can the evacuation plan for South Grade Road handle cars containing hundreds more people and horse trailers rapidly trying to leave the project site? Given that fire evacuation routes are normally bumper-to-bumper, how can cars and especially horse trailers squeeze onto South Grade Road? If the trees on the park berms catch fire, will they affect South Grade Road as an evacuation route? What can be done to mitigate these risks?

Unfortunately, these are not trivial issues. CNPS is or has been involved in three lawsuits against the County where fire was an issue, and other groups have won others. Even the California Attorney General is intervening on fire issues. To quote California Attorney General Bonta, on the win over the County on Adara, ““The land use decisions we make now will have consequences for years and decades to come. Today’s ruling by the Superior Court affirms a critical fact: Local governments have a responsibility to address wildfire risks associated with development projects at the front end. Doing so will save dollars – and lives – down the line.”⁴

This is not a threat to litigate, but rather a critical point: with respect to wildfires, especially the extreme, wind-driven fires that cause over 90% of all property and life loss, business as usual is radically insufficient. The park design, as shown in Figure 3.2, does not match the measures discussed in section 4.9 to minimize fire. Worse, the mitigation measures in sections 4.9 and 4.20 are insufficient to mitigate the impacts from fire. Worst of all, the County is not demanding of itself the same measures it routinely requires from developers to mitigate fire impacts, including in neighborhood parks. And the mitigations put forward by developers are failing in court. **What can be done to bring the Park design into compliance with current fire threats, the County’s own regulations, and AG Bonta’s hope that the County will save lives and dollars through completely addressing fire risks in the CEQA process?**

Issues with Greenhouse Gases

It is grimly amusing that the DEIR cites Executive Order B-55-18 (carbon neutral by 2045 or earlier and net negative emissions thereafter (p. 4.8-10) and then blithely talks about amortizing carbon emissions until 2052 seven pages later to make emissions less than significant. **This was meant ironically? If emissions from 2022 are to be carried on the books until 2052, does this not mean that the Project fails to comply with all programs directed at reducing societal emissions to zero before 2045? Is this not a significant, unmitigated impact?**

If it hopes to meet its goals and save itself, San Diego County will be working under a decreasing emissions cap and prioritizing emissions going forward, forcing as many groups as

⁴ <https://oag.ca.gov/news/press-releases/attorney-general-bonta-secures-victory-lawsuit-challenging-approval-san-diego>

possible to decarbonize, and allowing emissions only from critical projects, like public transit, affordable housing, and supplying water, food, power, and sewer service. Therefore, one of the key steps in claiming any special privilege to emit GHGs requires that a project specify, in detail, why it needs to be allowed to emit GHGs while others are not. **What is the reason that the proposed park should be allowed to emit greenhouse gases while most of Alpine will decarbonize? If the Park is to benefit Alpine residents now and into the future, should it not be constructed and maintained with minimal or no GHG emissions? Is there a configuration in which it could sequester enough GHGs to have net negative emissions?**

Second, not all GHG emissions from the Project were counted. Per P. 4.7-14 “Tree stumps and roots should be removed to such a depth that organic material is generally not present... and disposed of at a legal dumpsite away from the project area.” Normally, greenwaste rots and produces greenhouse gases. **How much carbon is stored in the project soil as organic matter? What type and amount of GHGs will be produced by its destruction?**

Third, per CEQA section 15064.4(b): ‘A lead agency should consider the following factors, among others, when determining the significance of impacts from greenhouse gas emissions on the environment: (1) The extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting.’

As noted in the draft San Diego Regional Decarbonization Framework⁵, Chapter 4 (citing other sources), grasslands only sequester up to half the carbon as forests. However, adding trees to non-forested landscapes is problematic as the trees may require care that makes them carbon emitters, and they offer fewer cobenefits to wildlife. The report further notes (again citing multiple sources) that converting grasslands to settlements generally turns carbon sequestering lands into carbon emitting lands. That is certainly the case here. **Isn’t this a significant impact?**

Can climate change impacts be properly determined without knowing how water and sewer will be supplied to the Project? How were the emissions numbers for water and sewer in the chapter determined, given that elsewhere in the DEIR these structures remain to be determined?

What is the carbon budget of the built park? Are lawns net GHG emitters or a net sequestration, given their shallow roots? Are trees, with the necessity for pruning, watering, fertilizing, net GHG emitters or net sequestration? Given that the trees will be growing in shallow imported soil, how long are they expected to survive, and what are the emissions costs of replacement?

Finally, why didn’t the DEIR use the current SANDAG Series 14 growth forecast, instead of Series 13? What happens when Series 14 is used instead?

Issues with the Alternatives Analysis

How does the preferred project alternative meet its objectives?

The alternatives (DEIR Chapter 6) are analyzed against the purpose of the project. Unfortunately, the preferred design is not analyzed against these objectives. Here is our take on how the preferred design meets the project objectives (P. 3-1):

- “Create a place where all Alpine residents can gather and connect as a community.” **Only one small shade sail shelter appears designed for communal activity, although the baseball field should lead to increased factionalism among the families of the teams**

⁵ <https://www.sandiegocounty.gov/content/sdc/sustainability/regional-decarbonization.html>

competing. Everything else is designed for individual activity, which does not connect people in community.

- **“Anticipate, accommodate, and manage a variety of active and passive recreational uses and open space preserve that benefit all members of the Alpine community both now and in the future.” The proposed design fails to incorporate lessons learned from the construction of Joan MacQueen Middle School, which went over time and budget due to dealing with the same clay and boulder soils under the project. The park fails to justify GHG emissions both during construction and operation, despite the County’s increasing commitment to decarbonize by 2035. The project fails to incorporate lessons learned on fire safety, despite the fact that the County has lost multiple lawsuits on this issue and the California Attorney General is now intervening to try to make hazardous projects more safe. Where is the substantial evidence that there is anything forward-looking in the current design, or that it can accommodate a hotter, drier, all-electric, less-lawn future?**
- **“Provide for long-term natural and cultural resource management consistent with the goals and objectives of the Multiple Species Conservation Program (MSCP) for the preserve portion of the property.” How is this goal met, when creation of a resource management plan for the preserve is deferred?**
- **“Design a community park that integrates and, where feasible, preserves natural features into the park design.” What is natural about lawns, a skate park, a baseball field, and 275 parking spaces? Why were commenters’ attempts to request feasible alternatives that preserved more natural features summarily rebuffed and not analyzed in the DEIR?**
- **Enhance the quality of life in Alpine by providing exceptional park and recreation opportunities that improve health and wellness, while preserving significant natural and cultural resources. What is exceptional about ripping up a rare native grassland and planting turf and trees? Nothing could be more 20th Century. What is exceptional about designating one official mile of trail on a site where more than half the existing trails will be closed? What is useful about adding a mountain bike course when bikers can ride miles of trails in the adjacent National Forest? How can a site be preserved if the goal is to increase human usage by an order of magnitude and to radically reengineer it down to the bedrock?**
- **Protect public health and safety by incorporating Crime Prevention Through Environmental Design and other safety measures into park design. Where is Crime Prevention Through Environmental Design mentioned in the EIR, except in lists of objectives? Surely if this is a goal, it wouldn’t it be described and analyzed in its own section?**
- **Manage Alpine County Park consistent with County DPR's missions, policies, directives, and applicable laws and regulations. How does this help the County meet its goals for reducing carbon emissions, reducing fire risk, preserving Tier I vegetation communities, and managing recreational impacts to sensitive species?**
- **Reflect Alpine community's heritage through inclusion of architectural elements that reflect the rural nature of Alpine. When over 60% of local respondents asked for more natural space and were told that was impossible, they were getting an active use park whether they wanted it or not, how does this park reflect the character of the community? The community told DPR quite clearly what they wanted. Why aren’t their concerns being met?**

In summary, the proposed project fails to meet most of its stated objectives. Some (Crime Prevention Through Environmental Design, a Resource Management Plan for the preserved portion) are not even part of the DEIR.

Other Alternatives

A No Project Alternative performs at least as well as the proposed project. It is forward looking, in that it preserves a landscape that is sequestering carbon (a critical County need for the foreseeable future), and preserves Tier I perennial grassland (habitat preservation is a critical need for the foreseeable future, and potentially a mitigation bank). It is already traversed by a fairly small number of people, in groups and families, so it arguably provides active recreation to the local community. It meets the majority of the community's desire for a rural area with nature (not a naturalistic playground), and it saves the County from unending maintenance costs and carbon emissions to keep acres of lawn green. **Why does the No Project Alternative not score higher than the preferred project?**

CNPS requested, in our comment letter to the NOP: "Please include a project alternative with a smaller, nature-focused, minimally developed park that has no impacts to the biological, cultural, and other resources of the project site, Wright's Field Ecological Preserve, and neighboring properties. Given voiced community concerns about the lack of maintenance on existing Alpine parks, please focus on making park upkeep and maintenance financially sustainable for the community and County. Also make its construction, maintenance, and rebuilding carbon neutral and environmentally sustainable, to meet federal, state, and county goals. Please also analyze each and every project alternative equally, as unequal analysis has been contentious on past county projects." None of this was done. **Why not?**

The proposed equestrian staging area without even a Resource Management Plan utterly fails to meet what the community and CNPS requested. We recognized that a parking site on the east side of Wright's Field would be very useful and increase safety. A Resource Management Plan for the site is necessary, and the existing perennial grassland may be more valuable to the County than more lawns. With minimal development, there is less to vandalize, and a dirt parking lot would at least have the advantage of automatically excluding vehicles during rains, when people would cause the most damage to the park and Wright's Field. This arguably meets the project objectives better than the proposed project does. **Why not consider it?**

Alpine has no need for more park area, as it is abundantly supplied by the adjacent Cleveland National Forest and by existing local parks. **When there is a boulder-covered hill with trails on it next to the park, why should any child be confined to a "naturalistic play area?" With 13 mountain biking trails within the adjacent Cleveland National Forest and Wright's Field open to mountain biking for years, why is closing the existing unauthorized trail system down to a single mile of trail worth adding hundreds of parking spots?**

Furthermore, Alpine is getting upgrades to its existing parks. The County Supervisors this week (11/17/2021) considering another amendment to the JEPA with Joan MacQueen Middle School. Its purpose is **"to rehabilitate an existing underutilized decomposed granite (DG) multi-use sports field [emphasis added]** at Joan MacQueen Middle School. Once completed, improvements will be open to the public during non-school hours and include an artificial turf multi-use sports field and Americans with Disabilities Act (ADA) improvements to increase field access." Within a mile of the proposed project, there is an underused active recreation field, and the County is ready to spend money to upgrade it. Meanwhile, the proposed

Project probably needs to comply with the ADA, as explained above. **What does this JEPA amendment say about the need for this Project within a mile of it?**

What to do to fix all this?

Write a resource management plan for the part that's part of the MSCP Preserve.

Re-engineer the curb on the site where the existing parking lot is, to make it more accessible to regular cars. Possibly clear the existing dirt parking lot and move boulders to keep unauthorized expansions from growing the parking lot or people driving onto the grassland. This provides stable access for Wright's Field, which is needed. It can remain dirt, which will appropriately keep people out of the park when the soil is wet.

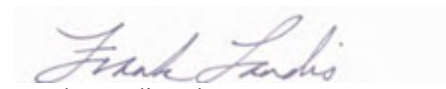
Leave the grassland in its current state. Wait 15 years. If Alpine has grown to the point that it needs more local park space, reconsider developing it using technology that is genuinely carbon neutral. Regardless, in 15 years, create a park that meets the needs of Alpine and the County. Consider that the site as it exists may be more useful to the County as a Tier I mitigation bank and/or a carbon sequestration area, and leave these options open.

In a time of rapid change and reorganization, we do not need another heavily engineered, big lawn park to maintain. If the proposed park is built, either it will become a regional destination, in which case Alpine residents will be crowded out, or it will not be used more than the site already is, in which case it will be a white elephant needing continual upkeep and rebuilding due to the expansive soils and climate change. Or both sequentially. By the time Alpine grows enough to generate 500 trips per day as a local park, it will be dilapidated and need massive rebuilding to meet new, carbon-neutral land use codes. **Why not skip the white elephant stage and wait to see what the actual, long-term need is?**

And if the County has millions to spend on parks, why not prioritize those funds to support environmental justice needs in less advantaged communities? Residents of Alpine seem to agree with this idea. **Why not let them be generous?**

Thank you for taking these comments. Please keep us informed about the project at conservation@cnpssd.org, franklandis03@yahoo.com, gcourser@hotmail.com, and pjheatherington@gmail.com. Feel free to contact us with any questions or comments, or to set up a meeting.


Stay safe,



Frank Landis, PhD
Conservation Chair, California Native Plant
Society, San Diego Chapter

/S/

George Courser
Conservation Committee Chair
Sierra Club San Diego



Pamela Heatherington
Board of Directors, Environmental Center of San
Diego



February 1, 2023

County of San Diego
Parks and Recreation
% Anna Prowant
5500 Overland Ave. Suite 410
San Diego, CA 92123
Via email: CountyParksCEQA@sdcounty.ca.gov

Dear Ms. Prowant:

O13-1

I am pleased to write this letter on behalf of the San Diego Mountain Biking Association (SDMBA) to submit our comments on the updated Draft EIR for the plan for the Alpine County Park. SDMBA supports the original proposed park plan and rejects any of the offered alternatives in the DRAFT EIR.

The community of Alpine deserves a park that has been planned with extensive input from the community over the past 4 years. We continue to stand in full support of the bike park and all-wheel park amenities which we know will be embraced by the community and riders of all ages.

O13-2

The San Diego Mountain Biking Association (SDMBA), founded in 1994, is the leading trail advocacy organization in the County. Our mission is to improve trail access for mountain biking in San Diego County. Our goals include creating and enhancing connected trail systems in both urban and rural settings that allow for recreational opportunities and alternative transportation options balanced with the conservation needs of our unique environment.

SDMBA and our 1800 members support the County of San Diego in their planning and design of this park. We thank the County of San Diego Department of Parks and Recreation for their vision of providing connected trails and quality parks for the people of San Diego County.

Sincerely,

A handwritten signature in black ink that reads "Susie Murphy".

Susie Murphy
Executive Director
executivedirector@sdmba.com

PO Box 881491
San Diego, CA 92168
SDMBA.com - 501(c) 3 #20-1701837

12/22/2022

Murphy, Susie (Voicemail)

O13a-1

Hey Anna, this is Susie Murphy with the San Diego Mountain Biking Association. I was just going through the draft EIR for the Alpine Park and ya wow, just wanted to chat about the alternatives. I skimmed it at this point and it seems that Alternative 3 retains the plans for the bike park and the all-wheel park. So anyway I just wanted to get your insights and we are definitely planning on submitting comments before the February deadline, but just wanted to see other insights and thoughts if we were on the right track on that Alternative 3. Anyway, no rush on this if you are already off for the holiday. Please feel free to get in touch with me in early January or whenever. Okay, bye.



County of San Diego

Brian Albright
DIRECTOR
PHONE (858) 966-1301

Department of Parks and Recreation
5500 OVERLAND AVENUE, SUITE 410, SAN DIEGO, CA 92123
www.sdcounty.ca.gov/dpr

FINAL ENVIRONMENTAL IMPACT REPORT for the Alpine County Park Project

State Clearinghouse (SCH) #2021030196

Volume 2

Recirculated Sections of the Draft Environmental Impact Report

Lead Agency:

**County of San Diego
Department of Parks and Recreation
5500 Overland Avenue, Suite 410
San Diego, CA 92123**

Contact: Jessica Montgomery, (619) 323-8672

October 2023



County of San Diego

Brian Albright
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RECIRCULATED SECTIONS OF DRAFT ENVIRONMENTAL IMPACT REPORT for the Alpine Park Project

State Clearinghouse (SCH) #2021030196

**Draft EIR RecCirculated: (December 16, 2022 through February 14 February
28, 2023)**

Lead Agency:

**County of San Diego
Department of Parks and Recreation
5500 Overland Avenue, Suite 410
San Diego, CA 92123**

Contact: Anna Prowant, CountyParksCEQA@sdcounty.ca.gov

**~~December 2022~~
January 2023**

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Preface

Introduction

This chapter describes why portions of the Draft Environmental Impact Report (EIR) for the Alpine Park Project (project) are being revised and recirculated under the California Environmental Quality Act (CEQA), provides an overview of the content and scope of the Recirculated Sections of the Draft EIR (Recirculated Sections), and summarizes the public comment period after the Recirculated Sections have been made available for public and agency review.

Summary

In September 2021, the County of San Diego (County) Department of Parks and Recreation (DPR) prepared the Draft EIR for the project to analyze the potential significant environmental impacts resulting from construction and operation of the proposed project. Upon review of comments received on the Draft EIR, the County DPR determined that certain portions of the Draft EIR were deficient and needed to be corrected. The Recirculated Sections have been prepared to correct the deficiencies or provide additional information.

Pursuant to CEQA, if revisions to the EIR are limited to chapters or portions of the EIR, the lead agency need only recirculate the chapters or portions that have been modified (CEQA Guidelines, Section 15088.5[c]). Therefore, the Recirculated Sections include changes to the Executive Summary, Section 4.4, *Biological Resources*; Section 4.9, *Hazards and Hazardous Materials*; Section 4.20, *Wildfire*; Chapter 6, *Alternatives*; and associated technical appendices. The Table of Contents is not provided in strikeout/underline because it has been replaced in its entirety. Section 4.4, *Biological Resources* and the appendices are not provided in strikeout/underline because they are new or have been replaced in their entirety. The 2021 circulated versions of Section 4.4, *Biological Resources* and the appendices are at www.sdparks.org/publicreview.

Those portions of the Draft EIR that were not found deficient will not be recirculated. Pursuant to the CEQA Guidelines, Section 15088.5(f)(2), County DPR will not seek or entertain any further comments on those portions of the Draft EIR. County DPR will prepare written responses to comments received on both the Draft EIR and Recirculated Sections. Thereafter, the County will complete the Final EIR, consisting of the portions of the Draft EIR that were not subject to substantive revision, the Recirculated Sections, public comments, and written responses to comments on the Draft EIR and Recirculated Sections. The County Board of Supervisors will then review the Final EIR, consider the information presented therein prior to acting on the proposed project, and determine if the Final EIR is adequate, complete, in compliance with CEQA, and reflective of the Board of Supervisor's independent judgment and analysis.

Table P1 provides a brief overview of the Recirculated Sections and the rationale for their inclusion in the recirculation.

Table P1. Revised and New Sections of the Draft EIR Included in Recirculation

New Sections and Revised Sections of the Draft EIR	Rationale for Inclusion in Recirculation
<i>Preface</i>	This <i>Preface</i> is included in the recirculation to provide the public with information concerning modifications to the Recirculated Draft EIR. The <i>Preface</i> is a new section that has not been previously released for public review. <u>The <i>Preface</i> has been updated for the extension of the Public Review Period for the Recirculated Draft EIR and to address the minor typographical errors.</u>
<i>Executive Summary</i>	The <i>Executive Summary</i> has been revised to include Alternative 5 – Passive Park Alternative. Table ES-1 has also been updated to reflect revisions made to the impacts and mitigation measures in Section 4.4, <i>Biological Resources</i> . <u>The <i>Executive Summary</i> has been updated for the extension of the Public Review Period for the Recirculated Draft EIR and to address the minor typographical errors.</u>
Section 4.4, <i>Biological Resources</i>	The <i>Biological Resources</i> section has been replaced in its entirety and revised to address impacts on the western spadefoot, further refine the impact analysis and mitigation proposed for special-status bat species and burrowing owl and include analysis for additional special-status species as requested by the wildlife agencies and public commentors. The revised section also includes a discussion of impacts on biological resources associated with wildfire fuel modification zones, further expanded on potential impacts on the Wright’s Field Preserve and wildlife corridors and modified the proposed mitigation for impacts on native grasslands. Western spadefoot surveys and special-status bat surveys were conducted in 2022 to support this additional analysis. Vegetation mapping also was updated in the summer of 2022 to match current conditions.
Section 4.9, <i>Hazards and Hazardous Materials</i>	The <i>Hazards and Hazardous Materials</i> section has been revised to address the wildfire hazards and prevention measures incorporated into the project design in compliance with the County fire and building codes. A Site-Specific Wildfire Evacuation Plan analysis was prepared by CR Associates and incorporated into this Recirculated Section. <u>The <i>Hazards and Hazardous Materials</i> section has been updated for the extension of the Public Review Period for the Recirculated Draft EIR and to address the minor typographical errors.</u>
Section 4.20, <i>Wildfire</i>	The <i>Wildfire</i> section has been revised to identify site-specific wildfire and ignition risks associated with the project site. It incorporates fire prevention measures as part of the project design in compliance with the County fire and building codes. A Site-Specific Wildfire Evacuation Plan analysis was prepared by CR Associates and incorporated into this Recirculated Section. <u>The <i>Wildfire</i> section has been updated for the extension of the Public</u>

New Sections and Revised Sections of the Draft EIR	Rationale for Inclusion in Recirculation
	<u>Review Period for the Recirculated Draft EIR and to address the minor typographical errors.</u>
Chapter 6, <i>Alternatives</i>	Chapter 6, <i>Alternatives</i> , has been revised to include Alternative 5 – Passive Park Alternative. <u>The <i>Alternatives</i> section has been updated for the extension of the Public Review Period for the Recirculated Draft EIR and to address the minor typographical errors.</u>
Appendix D, <i>Biological Resources Report for the Alpine County Park Project</i>	Appendix D has been replaced in its entirety and revised to include additional information and analysis related to impacts on the western spadefoot, further refine the impact analysis and mitigation proposed for special-status bat species and burrowing owl and include analysis for additional special-status species as requested by the wildlife agencies and public commentors. The revised report also includes a discussion of impacts on biological resources associated with wildfire fuel modification zones, further expanded on potential impacts on wildlife corridors and modified the proposed mitigation for impacts on native grasslands. Western spadefoot surveys and special-status bat surveys were conducted in 2022 to support this additional analysis. Vegetation mapping also was updated in the summer of 2022 to match current conditions.
Appendix D1, <i>Multiple Species Conservation Program Conformance Statement</i>	Appendix D1 is a new appendix that assesses the project's conformance with the Multiple Species Conservation Program.
Appendix J, <i>Fire & Emergency Operational Assessment</i>	Appendix J is a new appendix prepared by Rohde and Associates to identify wildfire risks at the project site.
Appendix K, <i>Alpine Park Fire Evacuation Plan Analysis</i>	Appendix K is a new appendix prepared by CR Associates to assess the time required for emergency evacuation from the project site under several scenarios.
Appendix L, <i>Defensible Space Requirements Letter</i>	Appendix L is a new appendix prepared by the Alpine Fire Protection District to identify defensible space requirements and fuel reductions at the project site.

The Recirculated Sections have been prepared to address the deficiencies identified in the public comments and provide additional information, as summarized below.

Executive Summary (Entire Section Recirculated)

The *Executive Summary* has been updated to include Alternative 5 – Passive Park Alternative. Table ES-1 has also been updated to reflect revisions made to the impacts and mitigation measures in Section 4.4, *Biological Resources*. The *Executive Summary* has been updated for the extension of the Public Review Period for the Recirculated Draft EIR and to address the minor typographical errors.

Section 4.4, *Biological Resources* (Entire Section Recirculated)

Section 4.4, *Biological Resources*, and the accompanying Biological Resources Report (Appendix D) have been updated to incorporate additional language regarding potential impacts on the western

spadefoot, further refine the impact analysis and mitigation proposed for special-status bat species and burrowing owl and include analysis for additional special-status species as requested by the wildlife agencies and public commentors. Section 4.4, *Biological Resources*, and the accompanying Biological Resources Report also include a discussion of impacts on biological resources associated with wildfire fuel modification zones, further expanded on potential impacts on wildlife corridors and modified the proposed mitigation for impacts on native grasslands. Western spadefoot surveys and special-status bat surveys were conducted in 2022 to support this additional analysis. Vegetation mapping also was updated in the summer of 2022 to match current conditions.

Section 4.9, *Hazards and Hazardous Materials* (Entire Section Recirculated)

The County revised Section 4.9, *Hazards and Hazardous Materials*, to address the wildfire hazards and prevention measures incorporated into the project design in compliance with the County fire and building codes. The County incorporated fire prevention protocols recommended in the Rohde and Associates assessment as project design features, including the facility's fire-safe design, landscaping consistent with the County-approved fire-resistant plant palette, and fuel modification treatments and fire buffers. A Site-Specific Fire Evacuation Plan analysis was prepared by CR Associates and incorporated into this Recirculated Section (Appendix K). The *Hazards and Hazardous Materials* section has been updated for the extension of the Public Review Period for the Recirculated Draft EIR and to address the minor typographical errors.

Section 4.20, *Wildfire* (Entire Section Recirculated)

The County revised Section 4.20, *Wildfire*, to identify site-specific wildfire and ignition risks associated with the project site. It incorporate fire prevention measures as part of the project design in compliance with the County fire and building codes. The County incorporated the fire prevention protocols recommended in the Rohde and Associates assessment as project design features, including the facility's fire-safe design, landscaping consistent with the County-approved fire-resistant plant palette, and fuel modification treatments and fire buffers. A Site-Specific Fire Evacuation Plan analysis was prepared by CR Associates and incorporated into this Recirculated Section. The *Wildfire* section has been updated for the extension of the Public Review Period for the Recirculated Draft EIR and to address the minor typographical errors.

Chapter 6, *Alternatives* (Entire Section Recirculated)

The County revised Chapter 6, *Alternatives*, to include Alternative 5 – Passive Park Alternative. Under this alternative, the project site would be developed with a 0.23-acre passive park that would include a formalized parking area with access to existing trails. It would establish the existing 1.1 miles of multi-use trails for public use.

Only the above-outlined revised information is contained in the Recirculated Sections. All other sections of the Draft EIR and technical studies remain valid and are *not* being recirculated for public comment. The *Alternatives* section has been updated for the extension of the Public Review Period for the Recirculated Draft EIR and to address the minor typographical errors.

Public Review of Recirculated Sections of Recirculated Draft EIR

The Recirculated Sections are available for public review and comment. The County requests that reviewers limit all public comments to the recirculated documents described in Table P-1. The ~~4560~~-day public review period is from December 16, 2022 to February 14, 2023.

On January 30th, 2023 a Notice of Extended Comment Period was issued for the Draft Recirculated Environmental Impact Report for the proposed Alpine Park Project that extended the end of the public comment period to February 28th, 2023. The County extended the public comment period for the Draft Recirculated Environmental Impact Report by 14 days from the date of January 30th, 2023, for a total of 74 days. The County has replaced the *Preface, Executive Summary, Hazards and Hazardous Materials, Wildfire, and Alternatives* sections to correct minor typographical errors, including those with the ~~strikeout/underline~~ changes in the document, to provide clarity for the reader. No new information is presented in these replaced documents.

All comments received on the Recirculated Sections will be responded to and incorporated into a Response to Comments document, which will be considered by the County prior to a public hearing to consider certification of the Recirculated Sections, along with other Final EIR sections. The Recirculated Sections will be available to review electronically on the County's website at www.sdparks.org/publicreview ~~http://www.sdparks.org/content/sdparks/en/AboutUs/Plans/public-review-documents.html~~ during the ~~4574~~-day public comment period.

Upon request, the Recirculated Sections will be available for review during regular business hours for the duration of the ~~6074~~-day public review period at the following locations:

County of San Diego, Department of Parks and Recreation
5550 Overland Avenue, Suite 410
San Diego, California 92123

Alpine County Library
1752 Alpine Boulevard
Alpine, California 91901

Written and electronic comments concerning the Recirculated Sections can be mailed or emailed to the following:

County of San Diego, Department of Parks and Recreation
Attn: Alpine Park Environmental Review
5550 Overland Avenue, Suite 410
San Diego, California 92123

CountyParksCEQA@sdcounty.ca.gov

Executive Summary

Introduction

This chapter provides a summary of the Draft Environmental Impact Report (EIR) prepared for the Alpine Park Project (project), ~~prepared~~ in compliance with the California Environmental Quality Act (CEQA). The County of San Diego (County) Department of Parks and Recreation (DPR) is the CEQA Lead Agency for the EIR and, as such, has the primary responsibility for evaluating the environmental effects of the proposed project and considering whether to approve or disapprove the proposed project in light of these effects.

As required by CEQA, this Draft EIR does the following: (1) describes the proposed project, including its location, objectives, and features; (2) describes the existing conditions at the project site and nearby environs; (3) analyzes the direct, indirect, and cumulative adverse physical effects that would occur ~~on the~~ with respect to existing conditions should the proposed project be implemented; (4) ~~identifies~~ identifies feasible means of avoiding or substantially lessening the significant adverse effects; (5) ~~provides~~ provides a determination of significance for each impact after mitigation is incorporated; and (6) ~~evaluates~~ evaluates a reasonable range of feasible alternatives to the proposed project that would meet the basic project objectives and reduce a project-related significant impact.

This Executive Summary covers the following topics: (1) Project Description; (2) Areas of Controversy/Issues Raised by Agencies and the Public; and (3) Issues to Be Resolved, including significant environmental effects and ~~the consideration of~~ alternatives to the proposed project.

Project Description

Overview

The County DPR is proposing ~~the~~ development of an approximately 25-acre active park within approximately 96.6 acres of undeveloped land in the unincorporated community of Alpine in east San Diego County. The County DPR proposes ~~to conserve~~ conserving the remainder of the property as open space/preserve.

land. The project would develop the active park with amenities such as multi-use turf areas, a baseball field, an all-wheel area, a bike skills area, recreational courts (~~i.e., for~~ for basketball, pickleball, ~~game table plaza~~), fitness stations, a leash-free dog area, restroom facilities, an administrative facility/ranger station, equestrian staging area with a corral, a nature play area, a community garden, a volunteer pad, picnic areas with shade structures and picnic tables, a game table plaza, and trails. The project would also include a parking area ~~capable of accommodating that would accommodate~~ would accommodate approximately 250 ~~to 275 spaces for single vehicle spaces~~ to 275 spaces for single vehicles; 10 Americans with Disabilities Act ~~(ADA)~~ (ADA) ~~compliant~~ compliant spaces would be available near the primary entrance and administrative building; and in the eastern portion of the site, along South Grade Road. Volunteer pad parking spaces, an equestrian staging area (vehicle parking), and corrals would be located in the northern portion of the project site. For utilities, the project proposes ~~to connect~~ connecting to the existing sewer system or include ~~ing~~ ing a septic system to serve the restroom

facilities, administration facility/ranger station, and volunteer pad. Stormwater retention basins ~~will~~would be located throughout the park.

The project would be open to the public from sunrise to sunset. Dogs on leashes would be allowed within all areas of the park, and ~~dogs-off-leash dogs~~ would be permitted within the designated leash-free dog area. “No Parking” signs would be installed along the shoulder of South Grade Road, as deemed necessary by the Department of Public Works (DPW), Traffic Division, to prevent potential overflow parking on South Grade Road. The project would ~~involve~~require one on-site ranger, two maintenance staff members, and one volunteer. The volunteer would live on the site full-time to help with maintenance and management of the property.

The project includes maintenance ~~off~~or approximately 1 mile of existing trails, ~~and; it~~ would close approximately 3,300 linear feet of existing, informal-~~use~~ trails. These existing trails are located north and west of the active park area.

The remaining 70 acres for open space/preserve would allow for restoration/habitat enhancement.

Project Location

The project site is in the eastern portion of San Diego County, California, approximately 1 mile south of the center of the unincorporated community of Alpine, and approximately 1 mile south of Interstate (I-) 8 (Figure 2-1). The project site is adjacent to the ~~Backcountry~~Back Country Land Trust’s (BCLT) Wright’s Field Preserve, ~~to the north of South Grade Road and,~~ east of Tavern Road, and south of Alpine Boulevard.

The project falls within the area covered by the Alpine Community Plan, and is subject to the County General Plan Rural Lands Regional Category, with a Semi-Rural Residential (SR-2) land use designation. The site is currently zoned ~~as~~ A70, Limited Agricultural Use, and S80, Open Space.

Project Objectives

Section 15124(b) of the ~~State~~ CEQA Guidelines requires ~~the~~ a project description to contain a statement of objectives that includes the underlying purpose of the project. The objectives of the project are identified below.

- Create a place where all Alpine residents can gather and connect as a community.
- Anticipate, accommodate, and manage a variety of active and passive recreational uses ~~and, as well as an~~ open space preserve, that benefit all members of the Alpine community, both now and in the future.
- Provide for long-term natural and cultural resource management consistent with the goals and objectives of the Multiple Species Conservation Program (MSCP) for the preserve portion of the property.
- Design a community park that integrates and, where feasible, preserves natural features into the park design.
- Enhance the quality of life in Alpine by providing exceptional park and recreation opportunities that improve health and wellness, while preserving significant natural and cultural resources.
- Protect public health and safety by incorporating Crime Prevention ~~Through~~ Environmental Design and other safety measures ~~into the~~ park design.

- Manage Alpine County Park consistent with County DPR's missions, policies, and directives, and along with applicable laws and regulations.
- Reflect Alpine community's heritage through the inclusion of architectural elements that reflect the rural nature of Alpine.

Areas of Known Controversy/Issues Raised by Agencies and the Public

Section 15123 of the ~~State~~ CEQA Guidelines requires the summary of an EIR to include areas of controversy that are known to the Lead Agency, including issues raised by agencies and the public. The County DPR circulated a Notice of Preparation (NOP) to solicit agency and public comments on the scope and content of the environmental analysis, beginning on March 8, 2021, and ending on April 7, 2021. The NOP is included as Appendix A.

A total of 33 comment letters were received during the NOP public review period. The primary issues raised were related to aesthetics, air quality, biological resources, ~~air quality~~, cultural resources, greenhouse gases (GHGs), geology and soils, hazards and hazardous materials, hydrology and water quality, noise, ~~utilities~~, public services, transportation, tribal cultural resources, utilities, and wildfire, and as well as the alternatives. A summary of all comments received is included in Table 1-2 of Chapter 1, *Introduction*, and all NOP comment letters are included in Appendix B of this EIR.

Issues to Be Resolved

Summary of Project Impacts

This Draft EIR examines the potential environmental effects of the project, including information related to existing site conditions, analyses of the types and magnitude of individual and cumulative environmental impacts, and feasible mitigation measures ~~that could to~~ reduce or avoid environmental impacts. In accordance with Appendix G of the ~~State~~ CEQA Guidelines, the potential environmental effects of the project were analyzed for the following areas.

- | | |
|---|---------------------------------|
| • Aesthetics and Visual Resources | • Land Use and Planning |
| • Agriculture and Forestry Resources | • Mineral Resources |
| • Air Quality and Health Risk | • Noise and Vibration |
| • Biological Resources | • Population and Housing |
| • Cultural Resources | • Public Services |
| • Energy | • Recreation |
| • Geology and Soils | • Transportation |
| • Greenhouse Gas Emissions and Climate Change | • Tribal Cultural Resources |
| • Hazards and Hazardous Materials | • Utilities and Service Systems |

- Hydrology and Water Quality
- Wildfire

Table ES-1, presented at the end of this chapter, provides a summary of the environmental impacts that could result from implementation of the project ~~and as well as~~ as well as feasible mitigation measures ~~that would~~ that would reduce or avoid the impacts. For each impact, Table ES-1 identifies the significance of the impact before mitigation, applicable mitigation measures, and the level of significance of the impact after ~~the~~ implementation of the mitigation measures.

Summary of Project Alternatives

The following alternatives are analyzed in detail in Chapter 6, *Alternatives*. The objective of the alternatives analysis is to consider a reasonable range of potentially feasible alternatives to foster informed decision-making and public participation. The alternatives to the project are summarized below.

Alternative 1 – No Project Alternative

Under the No Project Alternative, none of the proposed actions described in Chapter 3, *Project Description*, would occur at the 96.6-acre project site. The site would remain undeveloped and would not include 25 acres of active recreational uses, including potential multi-use turf areas, a baseball field, an all-wheel park, a bike skills area, recreational courts (~~i.e., for~~ i.e., for basketball, pickleball, ~~game table plaza~~), fitness stations, a leash-free dog area, restroom facilities, an administrative facility/ranger station, an equestrian staging ~~and area with~~ and area with a corral, a nature play area, a community garden, a volunteer pad, picnic areas with shade structures, ~~and~~ and picnic tables, ~~a game table plaza, and multi-use trails.~~ a game table plaza, and multi-use trails. The creation of a Habitat Conservation Plan for the remaining 71.6 acres would also not occur under this alternative.

Alternative 2 – Sports Complex Alternative

Under the Sports Complex Alternative, a greater area of the project site would be allocated to active recreational uses ~~and would include, including~~ and would include, including sports fields ~~intended for~~ intended for competitive sports, including club soccer and baseball teams. Under this alternative, a total of 50 acres of the project site would be developed with multi-use turf areas for soccer, etc., as well as baseball fields; and other features described in Section 3.3.1 of Chapter 3, ~~including (e.g., a skate park and an, equestrian staging area).~~ including (e.g., a skate park and an, equestrian staging area). In addition, because ~~this~~ this sports complex would be intended to accommodate competitive teams, extended hours would be allowed and field lighting for nighttime activities would be installed. The number of parking spaces would also be increased to accommodate the increase in parking demand that could occur with the larger active recreational space. The remaining 46 acres of the project site would include an open space/conservation area for which a Habitat Conservation Plan would be created.

Alternative 3 – Reconfigured Project Alternative

Under this alternative, the area of active recreation would be the same as under the project (25 acres) but moved to the southern portion of the site ~~and~~ and, with adjustments to the amenities and proposed design of the park. All of the active use features would remain, including the multi-use fields, baseball field, basketball, ~~and~~ and pickleball courts, ~~and the~~ and the skate, and bike parks. The picnic areas, equestrian staging area, dog park, and community garden areas would remain. The landscaped screening berm

would be removed, and the parking lot/drive aisles would be relocated to the interior of the site so that the exterior would remain green-scaped with native vegetation. A walking path would be added to the periphery of the active park area. This alternative would also include conservation of the remaining 71.6 acres of the project site with implementation of a Habitat Conservation Plan.

Alternative 4 – Reduced Project Alternative

Under the Reduced Project Alternative, the total square footage of the park would be reduced to 20 acres. All of the active use features would remain, including the multi-use fields, baseball field, and basketball, and pickleball courts, except for the skate and bike parks, which would be eliminated. Passive recreational amenities would remain ~~and would include~~, including the equestrian staging area, the multi-use trails, the game table plaza, the dog park, picnic areas, and the community garden, but ~~all at with~~ reduced square footages. The remaining area—76.6 acres—would consist of the conservation/open space area, including multi-use trails and a Habitat Conservation Plan area.

Alternative 5 – Passive Park Alternative

Under the Passive Park Alternative (refer to Figure 6-4), the project site would be developed with a 0.23-acre passive park. The formalized parking lot or staging area would be within the disturbed area adjacent to South Grade Road, south of the intersection with Calle De Compadres. The parking area would be graded as needed and consist of dirt and/or decomposed granite (DG), with an impervious surface for one or two ADA-compliant parking spaces. A split-rail fence would be constructed around the perimeter of the parking area. Alternative 5 would include a formalized parking area with access to existing trails through disturbed areas to ensure that no vegetation is affected. The Passive Park Alternative would establish the existing 1.1 miles of multi-use trails for public use. No restrooms or similar facilities that would require a higher level of on-site maintenance and ranger presence would be developed, but there would be a kiosk and a bench in a disturbed area at the trail head.

Environmentally Superior Alternative

Pursuant to CEQA, the EIR is required to identify the environmentally superior alternative. Although the No Project Alternative (Alternative 1) reduces the greatest number of significant impacts, CEQA requires that when the environmentally superior alternative is the No Project Alternative, CEQA requires that another alternative ~~should to~~ be identified.

The ~~Reduced Project~~ Passive Park Alternative (Alternative 4) reduces the second-largest number of significant impacts (see Table 6-3) because, unlike Alternatives 2, 3, and 4, this alternative would ~~reduce the overall~~ not include acreage ~~offer~~ for active park space ~~and; it would also eliminate the bike~~ provide access to existing trails and skate parks, establish them for public use. Alternative 4 ~~would also meet only one of the project objectives (#3); it would not achieve any of the other objectives related to creating a community gathering place, enhancing the quality of life and public health of the community, and accommodating a variety of active and passive recreational uses. Therefore, Alternative 4 would be the environmentally superior alternative because it would feasibly attain most of the basic objectives of the project while lessening significant effects of the project.~~ Under the Reduced Project Alternative (Alternative 4), the largest number of significant impacts would be reduced by eliminating the bike and skate portions of the active park.

Table ES-1. Project Impacts and Mitigation Measures

Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
4.1 Aesthetics and Visual Resources			
Project Impacts			
Impact-AES-1: Substantially Degrade Rural Views from Public Vantage Points during Construction. Construction of the project would interrupt expansive views with construction equipment and activities, substantially degrading the existing rural views available from South Grade Road and Wright's Field Preserve.	PS	MM-AES-1: Install Screening Fences Along the Active Park Boundary. County DPR or its contractors shall install temporary construction fence screening that is at minimum 8 feet tall. The construction fencing shall extend around the 25-acre active park boundary. The construction fencing shall be installed in phases so as to block views of construction equipment, materials, and ongoing construction activities, but would not block existing views that are available on the site. In this way the construction fencing would not block the entire 25-acre site at any given time. The construction fencing shall remain as long as construction activities are occurring on the project site.	LTS
Impact-AES-2: Substantially Degrade Rural Views from Public Vantage Points During Operation. Operation of the project would transform rural, undeveloped land to a complex regional park with several different development features, substantially degrading the existing rural views available from South Grade Road and Wright's Field Preserve.	PS	MM-AES-2: Maintain Areas of Native Vegetation Along the Project Boundaries. All boundaries of the Alpine Park shall be planted with areas of native vegetation to provide a transition from existing rural fields and native habitat to the landscaping and development of the County Park. Drought tolerant and native plants shall be located along the eastern and southern boundaries along South Grade Road, and on the western boundary along Wright's Field Preserve, and on the northern boundary.	LTS
Impact-AES-3: New Source of Light Adversely Affecting Nighttime Views. Operation of the project would result in new sources of lighting at the active park that could illuminate the nighttime sky and adversely affect nighttime views.	PS	MM-AES-3: Turn Off Outdoor Lighting 1 Hour After Closing. County DPR shall turn off all outdoor lighting at the parking lots, driveways, and recreational facilities in the active park 1 hour after the park closes, or use motion-sensors to limit duration of lighting, except for certain lighting for safety. Outdoor lighting shall be turned on when necessary when the park is open.	LTS

Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
4.2 Agriculture and Forestry Resources			
Implementation of the project would not result in any potentially significant impacts related to agriculture and forestry resources.			
4.2.3 Air Quality			
Impact AQ-1: Objectionable Odors. The project may have potentially significant odor impacts related to manure located in the equestrian staging areas and corrals.	PS	MM-AQ-1: Prepare and Implement a Manure Management Plan. The County DPR shall comply with the following best management practices, which will be documented in a Manure Management Plan: <ul style="list-style-type: none"> The equestrian areas, including the staging area and horse corrals, shall be cleaned at least once per day including the removal of manure. Manure stockpiled in receptacles shall be covered with a lid or tarp. Receptacles shall be located at the farthest feasible distance from nearby residents and/or sensitive receptors.	LTS
4.3.4 Biological Resources			
Impact-BIO-1: Significant Impacts on QCB Occupied Habitat. Occupied Quino checkerspot butterfly (QCB) habitat would be affected by construction and maintenance of the project. Impacts on occupied QCB habitat would be significant.	PS	MM-BIO-1: Obtain Federally Listed Species Permitting. The County DPR shall seek a Section 10 Incidental Take Permit (ITP) (or Section 7 ITP if there is a federal nexus) for impacts on QCB-occupied habitat and seek a determination that no adverse impacts on Hermes copper butterfly would occur because of impacts on proposed designated critical habitat for Hermes copper butterfly. Mitigation for impacts on occupied QCB habitat shall be provided in the form of on-site preservation of occupied habitat for QCB within the open space preserve, as well as assurance that no net loss of QCB host plants shall occur because of the project. The County DPR shall ensure that there is no net loss of QCB host plants by performing on-site enhancement and restoration activities within QCB habitat, including planting dot-seed plantain, removing thatch to support healthy populations of dot-seed plantain, and maintaining and monitoring these enhancement areas for a minimum of 5 years. Construction activities shall not occur until the ITP is secured. Conservation measures shall be implemented pursuant to that ITP and include measures to restore and	LTS

Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
<p>Impact-BIO-12: Significant Impacts on Decumbent Goldenbush. Of the 226 decumbent goldenbush individuals observed within the survey area, 110 would be affected by the project, which is nearly half of the onsite population. These impacts would be significant on the existing population of decumbent goldenbush, <u>absent mitigation.</u></p>	PS	<p>enhance QCB habitat and provide permanent habitat protection and maintenance activities within the open space/preserve.</p> <p>MM-BIO-12: Replace Decumbent Goldenbush. To mitigate for significant impacts on decumbent goldenbush, the County DPR shall replace at a 1:1 mitigation ratio any affected decumbent goldenbush individuals <u>at a 3:1 mitigation ratio.</u> Individual plants and/or seeds will be salvaged from the onsite population prior to the start of construction and installed within the open space/preserve. Plantings shall be monitored for a minimum of 3 years to ensure <u>that the 3:1 mitigation ratio has been met and that the planted individuals have properly established themselves.</u> Seed/material from onsite populations may be contract-grown to provide replacement plantings.</p>	LTS
<p>Impact-BIO-23: Potentially Significant Impacts on Engelmann Oaks. No direct impacts on any Engelmann oaks would occur because of implementation of the project. Indirect impacts may include potential grading within the root protection zone. Approximately 0.94 acre is within the root protection zone where grading/site preparation (e.g., compaction) and construction of park infrastructure would occur. Impacts would occur within the root protection zone, but not within the canopy/dripline, of approximately 25 Engelmann oak trees, including one individual that appears to be dying. These oaks are at risk of injury or mortality if construction activities damaged the root zones or aboveground portions of the trees. <u>Canopy thinning may also be conducted under the supervision of a certified arborist, as part of fire fuel management in these areas.</u> Engelmann oaks have endured challenges in recent years that threatened the long-term survival of the species; these challenges include development, pest infestations, and climate-change impacts. As a result, impacts within</p>	PS	<p>MM-BIO-32: Implement Engelmann Oak Avoidance and Minimization Measures. The following measures will minimize and avoid potential impacts on Engelmann oaks resulting from the pProject:</p> <ol style="list-style-type: none"> Engelmann oaks within 50 feet of any mass grading shall be fenced entirely around the tree dripline to ensure that no construction activities, including equipment staging, vegetation grubbing, driving, or grading, occur within the tree's dripline. These restrictions shall be communicated to the construction contractor prior to work in this area. Significant impacts anticipated within the Engelmann oak root protection zone shall be mitigated by additional planting of at least 25 Engelmann oaks within onsiteTo mitigate for any potential significant impacts to 	LTS

Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
the root protection zone <u>and impacts associated with fire fuel management activities</u> would be significant, absent mitigation.		<p><u>Engelmann oak trees, the County will monitor the health of all Engelmann oaks within 200 feet of the proposed Alpine County Park development footprint for 5 years following construction. A certified arborist with experience monitoring oak health will conduct the monitoring. Mortality or serious declines in the health of the Engelmann oaks during these 5 years within this area will be mitigated at a 3:1 ratio, should significant impacts occur. Specifically, three Engelmann oaks will be planted for each oak tree that has died or is in serious decline. The mitigation would occur within on-site Engelmann oak woodland areas that will be permanently protected. Planting shall occur within either the Native Habitat Protection Area or within the northwestern portion of the open space preserve. Planting shall be monitored annually for 5 years to ensure that at least 25 Engelmann oaks survive the initial plant establishment period. All oak plantings must be certified pathogen free, including for Phytophthora species.</u></p> <p>2.3. Any areas within the Engelmann oak root protection zone (i.e., all areas within 50 feet of Engelmann oak canopy) shall be identified on a map that is provided to the construction contractor. Any grading or construction activities within the root protection zone shall be monitored to minimize impacts on oaks to the maximum</p>	

Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
		<p>extent possible. Training shall be provided for the construction contractor by a biological monitor prior to the start of construction activities in this area. This training will detail ways that the construction contractor can reduce impacts as much as possible on Engelmann oaks within the root protection zone. The following avoidance and minimization measures must be implemented: (1) minimizing repetitive travel routes within the root protection zone, (2) restricting any long-term storage of heavy materials within the root protection zone, and (3) restricting work within the root protection zone when the ground is wet to avoid compaction as much as possible after a rain event. Additional avoidance and minimization measures not envisioned here that can be feasibly implemented during construction must be identified and implemented.</p>	
<p><u>Impact-BIO-3: Significant Impacts on QCB Occupied Habitat During Construction.</u> Occupied QCB habitat would be affected by construction and maintenance of the project. Impacts on occupied QCB habitat would be significant.</p>	<u>PS</u>	<p><u>MM-BIO-3: Ensure No Net Loss of Quino Host Plants and Provide Permanent Protection of Quino Habitat.</u> The County DPR shall seek a Section 10 Incidental Take Permit (ITP) for impacts on QCB-occupied habitat and comply with any additional mitigation required by the ITP. Regardless of the conservation measures required under the ITP, the County will mitigate for impacts on occupied QCB habitat by providing, at a minimum, on-site preservation of occupied habitat for QCB within the open space/preserve and ensure that no net loss of QCB host plants will occur because of the project. The County DPR shall ensure that there is no net loss of QCB host plants by performing on-site enhancement and restoration</p>	<u>LTS</u>

Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
		<p><u>activities within QCB habitat, including planting dot-seed plantain, removing thatch to support healthy populations of dot-seed plantain, and maintaining and monitoring these enhancement areas for a minimum of 5 years. Construction activities shall not occur until the ITP is secured. Conservation measures shall be implemented pursuant to that ITP and will include measures to restore and enhance QCB habitat and provide permanent habitat protection and maintenance activities within the open space/preserve.</u></p> <p><u>As part of its ongoing monitoring, the County will demonstrate that QCB persists on the project site at the end of the 5-year restoration and enhancement period. If QCB can no longer be found on either the County's preserve or within the adjacent Wright's Field in a normal flight-year at the end of the 5-year restoration period, the County will secure a specific off-site parcel that will contribute meaningfully to the species' long-term conservation.</u></p>	
<p><u>Impact-BIO-4: Significant Impacts on Western Spadefoot.</u> One seasonally inundated basin (AP-7) within which western spadefoot eggs were observed in 2019 would be filled in during construction of the active park. This impact could limit the ability of western spadefoot within the core breeding habitat on Wright's Field to expand territory during wet years. This could cause declines in the core population over time because it would restrict locations where breeding activities could occur and reduce breeding refugia sites. These impacts would be significant, absent mitigation.</p>	PS	<p><u>MM-BIO: 4 Western Spadefoot.</u> The County will mitigate for impacts on one western spadefoot breeding pool, approximately 157 square feet in size, by creating three permanent basins, encompassing a minimum of 471 square feet, to support western spadefoot breeding. These constructed basins will be created within clay soils on the permanently protected lands on the County's parcel, no closer than 100 feet from the western edge of Alpine Park. Basins will be constructed within approximately 262 meters of the core breeding population on Wright's Field to maximize opportunities for western spadefoots on Wright's Field to naturally expand into these newly constructed basins. No basins will be constructed within the areas proposed for QCB habitat enhancement activities.</p>	LTS

Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
		<p><u>Hydrological analysis will be conducted prior to site selection to map the micro-watersheds in potential sites and ensure the constructed basins fill naturally with rainwater. Basins will be constructed to allow for maximum inundated depths of approximately 18 to 24 inches (20 to 60 centimeters), with the goal that they remain inundated long enough to increase the chances for breeding to be successful during dry years. Conversely, the newly constructed basins shall be designed in such a way that they support standing water for only several weeks following seasonal rains and aquatic predators (e.g., fish, bullfrogs, crayfish) cannot become established. Because ponding duration is so critical to the success of this effort, additional studies may be needed to estimate infiltration rates, soil profile, depth of clay soil layer, etc. The County will conduct these studies, as needed, to estimate the ponding duration within constructed basins. Terrestrial habitat surrounding the proposed relocation site shall be as similar in type, aspect, and density to the location of the existing pool(s), as feasible.</u></p> <p><u>The County will develop a Western Spadefoot Habitat Mitigation and Monitoring Plan to describe requirements for the constructed basins, how basin sites are chosen, what activities will be conducted during the installation of the new basins, adaptive management, maintenance activities, access controls (e.g., fences), and what monitoring and reporting activities will occur and when. The data for the micro-habitat hydrological analysis will also be presented within this plan. The Western Spadefoot Habitat Mitigation and Monitoring Plan will be provided to the CDFW and USFWS for review and comment.</u></p>	

Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
		<p><u>The new basins will be constructed concurrently with Alpine Park, and western spadefoots observed within the project footprint will be relocated to suitable basins outside the project footprint.</u></p>	
		<p><u>Monitoring of the newly constructed basins will be conducted during the wet season (approximately December through April) at approximately weekly intervals, beginning with the first significant rain event each year for 5 years following completion of basin construction. The County's biologist will map the spatial extent of the basins, document the inundation depths of the basins and breeding outcomes, and determine if adaptive management is needed to increase survival and recruitment within the constructed basins. Notes will be made if egg masses or larvae are observed. One nocturnal adult survey will also be conducted in each of the 5 years when a breeding event is occurring in order to document the foraging/mobility patterns of western spadefoots in the area of the new basins. The County will also monitor the core breeding population on the Wright's Field Preserve, using the same methods described above (i.e., basin mapping, weekly checks, nocturnal survey) to document the population dynamics of the entire population over time.</u></p>	
		<p><u>Monitoring/survey data will be provided to CDFW and USFWS by the monitoring biologist following each monitoring period; a written report summarizing the monitoring results will be provided to CDFW and USFWS at the end of the monitoring effort each year. Success criteria for the monitoring program shall include evidence of a ponding duration that is suitable for western spadefoot reproduction within at least one of the</u></p>	

Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
		<p><u>constructed basins during at least one of the 5 years of monitoring.</u></p> <p><u>After exclusionary fencing has been installed around all initial proposed ground-disturbing construction, but prior to initiation of initial ground disturbance, the spadefoot biologist will conduct at least three nighttime surveys for spadefoots within the fenced area. Surveys will continue until no more spadefoots are captured and relocated out of the fenced footprint and/or upon the recommendations of the spadefoot biologist. These surveys will be conducted during appropriate climatic conditions and during the appropriate hours (i.e., nighttime, during rain events in breeding season) to maximize the likelihood of encountering spadefoots. If climatic conditions are not highly suitable for spadefoot activity, spadefoot habitat in the project footprint will be watered to encourage aestivating toads to surface. All spadefoots found within the project area will be captured and translocated by the spadefoot biologist to the nearest suitable habitat outside of the work area. Upon completion of these surveys and prior to initiation of construction activities, the spadefoot biologist will report the capture and release locations of all spadefoots found and relocated during these surveys to CDFW and USFWS.</u></p>	
<p><u>Impact-BIO-5: Habitat Impacts on Special-Status Reptiles.</u> Impacts on nine <u>eight</u> special-status reptile species (Baja California coachwhip, California glossy snake, coast patch-nosed snake, coast horned lizard, coastal western whiptail, Coronado skink, orange-throated whiptail, red-diamond rattlesnake, and Southern California legless lizard) would be significant, <u>absent mitigation.</u> Coast horned lizard and orange-throated whiptail are MSCP covered species that are considered adequately conserved with implementation of the South County MSCP. The larger preserve being</p>	PS	<p><u>APM-BIO-1: Establishment of the Open Space Preserve.</u> As required under the County's MSCP Subarea Plan, Alpine Preserve will be managed in perpetuity in accordance with an RMP. This plan will outline management activities to be carried out by the County. The activities that are likely to be included in the RMP would enhance and preserve the affected sensitive natural communities. These activities include long-term monitoring of on-site preservation areas, non-native and invasive species vegetation management, and habitat restoration in the preserve, as applicable. Through these</p>	LTS

Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation		
<u>assembled with implementation of the South County MCSP affords the remaining seven six species (not covered under the MSCP) additional regional conservation benefits because these species are generalists and can utilize a wide variety of habitats that are permanently protected under the MSCP. As a result, impacts on these species would be less than significant.</u>		<u>strategic measures to mitigate for impacts, the preserved sensitive natural communities will be managed to maintain high-quality and functioning habitat and the County DPR will demonstrate its long-term commitment to species conservation within the open space/preserve.</u> <u>MM-BIO-9: Provide Compensatory Habitat-Based Mitigation.</u> <u>To mitigate for potentially significant impacts on Tier I, Tier II, and Tier III habitats, the County will provide compensatory mitigation consistent with its BMO to reduce significant impacts on sensitive vegetation communities. Mitigation will be provided within open space preserve and/or within offsite location(s).</u>			
Table 4.4-5. Mitigation Requirements					
	Total Impacts	Mitigation Ratio	Mitigation Requirement	On-site Mitigation ^b	Off-site Mitigation
Tier I	14.86	2:1	29.73	17.48 acres of preservation plus 4.84 acres of restoration (see MM-BIO-10)	7.41 acres of restoration in Wright's Field Preserve (see MM-BIO-10)
Tier II	3.97	1.5:1	5.95	5.95	None
Tier III	3.57	1:1	3.57	None	3.57 ^b
^a Tiers correspond to those described in the County's BMO and mitigation sites will meet the criteria for BRCA. ^b Habitat-based mitigation for permanent direct impacts on non-native grassland will be satisfied through purchase of credits and/or land acquisition of a similar high-quality non-native grassland in an off-site location.					
<u>Impact-BIO-64: Habitat Potential Impacts on Special-Status Avian Species and other Birds Protected under the MBTA.</u> <u>Impacts on 22.4 acres of foraging and/or breeding habitat for special-status avian species would be significant, absent mitigation. Southern California rufous-crowned sparrow and ferruginous hawk are MSCP covered species that are considered adequately conserved with implementation of the South County MCSP. The larger preserve being assembled with implementation of the South County MCSP affords some of these generalist species (e.g., Cooper's hawk,</u>	PS	<u>APM-BIO-1: Establishment of the Open Space Preserve.</u> <u>The full description of the measure is provided above.</u> <u>MM-BIO-9: Provide Compensatory Habitat-Based Mitigation.</u> <u>The full description of the measure is provided above.</u> <u>MM-BIO-4: Avoid and Minimize Impacts on Special-Status Avian Species and Other Birds Protected under the MBTA.</u> <u>To mitigate for potentially significant</u>	LTS		

Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
<p><u>red-shouldered hawk, white-tailed kite) additional conservation benefits at a regional level because these species are generalists and can utilize a wide variety of habitats that are permanently protected under the MSCP. As a result, impacts on avian special-status species and raptors would remain less than significant.</u> Cooper's hawk and red-shouldered hawk were observed in the BSA. Both species are County Group I species. There is potential for both species to nest in the mature Engelmann oaks and forage in the grasslands and shrub/chaparral stands in the BSA. Impacts on red-shouldered hawk nests or Cooper's hawk nests, such as removal of an active nest during construction or the loss of eggs or chicks, would be significant.</p> <p>Implementation of the project would result in loss of approximately 22.3 acres of functional foraging habitat for raptors. Valley needle grassland and nonnative grassland both serve as prime foraging habitat for raptors, as do the open scrub habitats on the site. The project footprint would affect these habitats, resulting in a loss of functional foraging habitat for raptors. These impacts would be significant.</p> <p>Implementation of the project has the potential to affect the nesting success of sensitive animals if vegetation clearing for the initial construction of the park or any subsequent fuel modification activities are conducted during the breeding season. Impacts on the nesting success of sensitive animals would be a potentially significant impact.</p>		<p>impacts on sensitive nesting birds and raptors, the County DPR shall avoid ground-disturbing activities during the bird breeding season to keep the project in compliance with state and federal regulations regarding nesting birds (i.e., the federal MBTA and California FGC). The bird breeding season is defined as January 15 to September 15, which includes the tree-nesting raptor breeding season of January 15 to July 15, the ground-nesting raptor breeding season of February 1 to July 15, and the general avian breeding season of February 1 to September 15.</p> <p>If removal cannot be avoided during the bird and/or raptor nesting season, a nesting bird survey would be conducted no more than 72 hours prior to ground-disturbing activities by a qualified avian biologist within 500 feet of proposed ground- or vegetation-disturbing activities. This is necessary to definitively ascertain whether raptors or other migratory birds are actively nesting on the project site or in a vicinity that could be indirectly affected by work activities (i.e., through noise or visual disturbances). If any active nests are detected, the area shall be flagged and mapped on construction plans, along with a buffer, as recommended by the qualified biologist. The buffer area(s) established by the qualified biologist shall be avoided until the nesting cycle is complete or it is determined that the nest is no longer active. The qualified biologist shall be a person familiar with bird breeding behavior and capable of identifying the bird species of San Diego County by sight and sound and determining alterations of behavior as a result of human interaction. Buffers may be adjusted based on the observations by the biological monitoring on the response of the nesting birds to human activity.</p>	
<u>Impact-BIO-74: Potential Impacts on MBTA-Protected Special-Status Avian Species and other</u>	<u>PS</u>	<u>MM-BIO-45: Avoid and Minimize Impacts on Special-Status Avian Species and Other Birds Protected</u>	<u>LTS</u>

Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
<p><u>Birds Protected under the MBTA During Breeding Season.</u> Cooper's hawk and red-shouldered hawk were observed in the BSA. Both species are County Group I species. There is potential for both species to nest in the mature Engelmann oaks and forage in the grasslands and shrub/chaparral stands in the BSA. Impacts on red-shouldered hawk nests or Cooper's hawk nests, Impacts on the nesting success of any bird protected by the MBTA, such as removal of an active nest during construction or the loss of eggs or chicks from construction noise or human presence, would be significant.</p> <p>Implementation of the project would result in loss of approximately 22.3 acres of functional foraging habitat for raptors. Valley needle grassland and nonnative grassland both serve as prime foraging habitat for raptors, as do the open scrub habitats on site. The project footprint would affect these habitats, resulting in a loss of functional foraging habitat for raptors. These impacts would be significant.</p> <p>Implementation of the project has the potential to affect the nesting success of sensitive animals if vegetation clearing for the initial construction of the park or any subsequent fuel modification activities are conducted during the breeding season. Impacts on the nesting success of sensitive animals would be a potentially significant impact.</p>		<p><u>under the MBTA.</u> To mitigate for potentially significant impacts on sensitive nesting birds and raptors, the County DPR shall avoid ground-disturbing activities during the bird breeding season to keep the project in compliance with state and federal regulations regarding nesting birds (i.e., the federal MBTA and California FGC). The bird breeding season is defined as January 15 to September 15, which includes the tree-nesting raptor breeding season of January 15 to July 15, the ground-nesting raptor breeding season of February 1 to July 15, and the general avian breeding season of February 1 to September 15.</p> <p>If removal cannot be avoided during the bird and/or raptor nesting season, a nesting bird survey would <u>shall</u> be conducted no more than 72 hours prior to ground-disturbing activities by a qualified avian biologist within 500 feet of proposed ground- or vegetation-disturbing activities. <u>Biologists will also survey for raptor nests up to 1,500 feet from proposed ground- or vegetation-disturbing activities.</u> This is necessary to definitively ascertain whether raptors or other migratory birds are actively nesting in-on the project site, or in a vicinity that could be indirectly affected by work activities (i.e., through noise or visual disturbances). <u>Special attention will be paid to determining the presence of nesting grassland-endemic bird species, such as grasshopper sparrow, that may be nesting within the dense grasses present within the proposed development footprint.</u></p> <p>If any active nests are detected, the area shall be flagged and mapped on construction plans, along with a buffer, as recommended by the qualified biologist. The buffer area(s) established by the qualified biologist shall be avoided until the nesting cycle is complete or it is determined that the nest is no longer active. The qualified</p>	

Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
		biologist shall be a person familiar with bird breeding behavior and capable of identifying the bird species of San Diego County by sight and sound and determining . The biologist shall determine if alterations of to behavior have occurred as a result of human interaction. Buffers may be adjusted, based on the observations by the biological monitoring on monitor of the response of the nesting birds to human activity.	
<u>Impact-BIO-8: Potential Impacts on Breeding Burrowing Owl.</u> Although not documented as breeding on-site, burrowing owl could begin breeding within areas proposed for construction in the future. Potential impacts on breeding burrowing owl during construction would be significant.	<u>PS</u>	<u>MM-BIO-6: Burrowing Owl Preconstruction Surveys.</u> Prior to initiation of project clearing, grading, grubbing, or other construction activities, pre-construction surveys for the presence of burrowing owl, to verify species absence, will be conducted, including surveying suitable habitat within the project footprint and a 300-foot buffer by a qualified biologist; no grading shall occur within 300 feet of an active burrowing owl burrow. The pre-construction surveys shall follow the take avoidance survey methods outlined in the <i>Staff Report on Burrowing Owl Mitigation</i> (CDFW 2012). The first survey shall be conducted within 30 days of initial site disturbance, and the second survey shall occur within 24 hours of initial site disturbance. Following the initial pre-grading survey, the project site will be monitored for new burrows each week until grading is complete. Subsequent pre-construction surveys will be required if lapses in the project occur that exceed 72 hours. If present in the project construction footprint or within 300 feet of the project site, coordination with CDFW and USFWS shall occur to establish measures to avoid potential impacts on burrowing owl. Such measures will be decided in coordination with the CDFW and USFWS and follow the “Strategy for Mitigating Impacts to Burrowing Owls in the Unincorporated County” (Attachment A of the County’s	<u>LTS</u>

Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
		<p><u>Report Format and Content Requirements – Biological Resources).</u></p> <p><u>Following the first pre-construction survey within 30 days of initial site disturbance, the qualified biologist will submit a Pre-Grading Survey Report to the County, CDFW, and USFWS within 14 days of the survey and include maps of the project site. If any burrowing owls are observed, the burrowing owl locations on aerial photos and in the format described in the mapping guidelines of the County's Report Format and Content Requirements – Biological Resources will be included. A qualified biologist will attend the pre-construction meeting to inform construction personnel about the burrowing owl requirements.</u></p>	
<p><u>Impact-BIO-9: Impacts on Raptor Foraging Habitat.</u> <u>Impacts on 22.4 acres of prime foraging habitat for raptors would also be significant.</u></p>	PS	<p><u>APM-BIO-1: Establishment of the Open Space Preserve.</u> <u>The full description of the measure is provided above.</u></p> <p><u>MM-BIO-9: Provide Compensatory Habitat-Based Mitigation.</u> <u>The full description of the measure is provided above.</u></p>	LTS
<p><u>Impact-BIO-105: Significant Habitat Impacts on Pallid Special-Status Bats.</u> Seven bat Species of Special Concern and County Group II species were observed during protocol surveys: the pallid bat, Townsend's big-eared bat, western red bat, western yellow bat, western mastiff bat, pocketed free-tailed bat, and big free-tailed bat. Of these, the pallid bat is the only species expected to incur significant impacts on its long-term survival through implementation of the project. Impacts on up to 22.4 acres of habitat for special-status bats would be significant absent mitigation due to the small home ranges and</p>	PS	<p><u>MM-BIO-75: Support Protect Pallid Bat.</u> The County DPR shall work with a bat expert to design and install bat boxes to attract pallid bat prior to vegetation removal activities commencing on <u>the</u> site. These bat boxes should be designed to accommodate both solitary individuals and maternal roost sites. The <u>The</u> bat box design should reflect the best practices at the time of installation and be specific to larger-sized bats like pallid bat with respect to roost chamber sizes, etc. <u>The</u> dDesign and placement of <u>the</u> bat boxes should also consider how to best maintain proper roost temperature. When possible, the bat boxes should be</p>	LTS

Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
<u>specialized foraging habits for some of these species, lack of coverage for these species in the MSCP, and the California Species of Special Concern and/or Group I status for most of these species, indicating their relative rarity in the County.</u>		<p>placed along the edges of the wooded areas on <u>the site</u>. The final design, numbers, and placement of bat boxes will be determined by the bat expert in consultation with County DPR staff using the best practices known at the time.</p> <p>Monitoring of the bat boxes shall be conducted quarterly for the first 2 years, and twice-yearly during years 3 through 5 after installation. Any problems that are noted (e.g., mortality, predation) shall be addressed in consultation with the bat expert. Occupancy status, including species, numbers, etc., shall be documented to the extent possible without disturbing the occupants. If, after the first 2 years, a bat box remains unoccupied by any bat species, the County DPR and bat expert will discuss if the bat box needs to be repositioned on <u>the site</u>, or redesigned. An annual report shall be prepared by the bat expert or designee to document the findings of the monitoring visits. <u>The County will provide copies of this annual report to the CDFW and also include updates on the bat box monitoring on the site in the County's annual report for the MSCP.</u></p> <p><u>APM-BIO-1: Establishment of the Open Space Preserve.</u> <u>The full description of the measure is provided above.</u></p> <p><u>MM-BIO-9: Provide Compensatory Habitat-Based Mitigation.</u> <u>The full description of the measure is provided above.</u></p>	
<u>Impact-BIO-11: Potential Impacts on Maternal Roost Sites.</u> Impacts on any bat species roost sites, such as rock crevices or oak trees, could result in direct mortality of adults and possibly juvenile bats. Even if direct impacts on these sites do not occur, roosting	<u>PS</u>	<u>MM-BIO-8: Bat Roost Avoidance.</u> Because of the difficulty in detecting all potentially occurring roosting bats (e.g., the western red bat within the Engelmann oaks, pallid bats within rock crevices), no construction activities that could disturb maternal roost site will occur	<u>LTS</u>

Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
<p><u>females may be negatively affected by increased noise and disturbance within proximity of their roost sites, which could result in increased mortality of young or similar reduction in fecundity. Furthermore, roosting bats may be very difficult to detect; therefore, it would be hard to know if impacts on roost sites were occurring, absent detailed studies using mist nesting, tracking, and telemetry. Direct or indirect impacts on roost sites causing mortality or reproductive decline in special-status bats would be significant, absent mitigation.</u></p>		<p><u>during the pupping season (typically April 1 through August 31). This measure specifically precludes high-frequency surveying as well as intensive noise-generating activities (e.g., jack-hammering) within 200 feet of any Engelmann oaks or rock outcrops during the pupping season.</u></p> <p><u>If construction activities must occur within this 200-foot avoidance buffer during the pupping season, the County will conduct definitive bat roost surveys to determine the presence or absence of maternal day-roost and/or night-roost locations within the 200-foot avoidance buffer that overlaps the construction footprint. The bat biologist(s) who conduct these surveys shall have the appropriate education, training, and experience. The bat roost survey methodology will be described in a Bat Roost Management, Monitoring, and Mitigation Plan, which will be prepared at least 30 days prior to the start of construction and provided to CDFW.</u></p> <p><u>Bat roost survey methods may include mist netting and tracking individual bats using telemetry and/or additional acoustic surveys that are timed to determine if individual Engelmann oaks or rock outcrops within the 200 foot avoidance buffer are supporting bat roost sites. If any maternal roost sites within the 200 foot avoidance buffer are identified, an appropriate avoidance buffer shall be established around that roost site in accordance with the requirements established in the Bat Roost Management, Monitoring, and Mitigation Plan. Avoidance buffer distances will account for the ability of that individual bat species to tolerate specific types of low- and high-frequency construction noise and other human disturbance associated with the project. No construction activities that could disrupt the roost site will be permitted within the established avoidance buffer.</u></p>	

Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
		<p><u>Bat biologists will monitor construction activities occurring adjacent to the avoidance areas for the bat roost sites in accordance with the Bat Roost Management, Monitoring, and Mitigation Plan. Monitoring frequency and duration also will conform to the Bat Roost Management, Monitoring, and Mitigation Plan and be used to determine that the established bat roost avoidance buffers are large enough to prevent maternal roost site impacts, including, but not limited to, roost site abandonment. Avoidance buffers will be expanded if any stress or disturbance to the maternal roost site is observed during monitoring. In years 1, 3, and 5 following construction completion, the County will conduct bat surveys, including maternal bat roost surveys, within the areas originally surveyed prior to construction.</u></p> <p><u>If the maternal bat roost sites previously observed prior to and during construction are still observed during these monitoring surveys, no additional mitigation will be required. If any maternal roost sites observed prior to or during construction are no longer present (i.e., are not observed in any of the three post-construction surveys), the County will mitigate for the loss of the maternal roost site at a 2:1 ratio using methods agreed upon in the Bat Roost Management, Monitoring, and Mitigation Plan. This may include planting additional Engelmann oaks within the proposed preserve if the affected maternal roost site utilized Engelmann oak trees or by building artificial bat roosts specifically for the affected bat species.</u></p>	
<u>Impact-BIO-12: Habitat Impacts on Special-Status Mammals. Impacts on special-status mammal species would be significant, absent mitigation. The larger preserve being assembled with implementation of the South County MCSP affords these species some conservation benefits at a regional level because these</u>	<u>PS</u>	<u>APM-BIO-1: Establishment of the Open Space Preserve.</u> <u>The full description of the measure is provided above.</u>	<u>LTS</u>

Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
<u>species are generalists and can utilize a wide variety of habitats that are permanently protected under the MSCP. However, these species are not covered under the MSCP, and as such, impacts on these species would be significant, absent mitigation.</u>		<u>MM-BIO-9: Provide Compensatory Habitat-Based Mitigation.</u> <u>The full description of the measure is provided above.</u>	
<u>Impact-BIO-13: Operational Impacts on Special-Status Wildlife Species.</u> <u>Operation of the proposed project may result in reduced numbers of special-status species due to an increase in mortality rates as well as a decrease in use of habitat immediately surrounding the project footprint. These impacts on Group I Wildlife Species/California Species of Special Concern could potentially be significant, absent mitigation.</u>	PS	<u>APM-BIO-1: Establishment of the Open Space Preserve.</u> <u>The full description of the measure is provided above.</u> <u>MM-BIO-9: Provide Compensatory Habitat-Based Mitigation.</u> <u>The full description of the measure is provided above.</u>	LTS
<u>Impact-BIO-146: Direct Impacts on Sensitive Natural Communities.</u> <u>Direct impacts on up to 22.43 acres of Tier I, II, and III sensitive natural communities (i.e., VValley needlegrass grassland, flat-topped buckwheat stands, and nonnative grasslands) would be significant.</u> <u>The project would directly and permanently affect Engelmann oak woodland, Valley needlegrass, nonnative grassland, and flat-topped buckwheat within a Biological Resource Core Area (BRCA). Engelmann oak woodland and Valley needlegrass are listed as Tier I vegetation communities, flat-topped buckwheat is listed as a Tier II vegetation community, and nonnative grassland is listed as a Tier III vegetation community in Attachment K of the Biological Mitigation Ordinance (BMO). Impacts on Tier I through Tier III vegetation communities would be significant, absent mitigation.</u>	PS	<u>APM-BIO-1: Establishment of the Open Space Preserve.</u> <u>As required under the County's MSCP Subarea Plan, an open space preserve will be managed in perpetuity in accordance with a Resource Management Plan. This plan will outline management activities to be carried out by the County. Activities likely to be included in the Resource Management Plan would enhance and preserve the affected sensitive natural communities. These activities include long-term monitoring of onsite preservation areas, nonnative and invasive species vegetation management, and habitat restoration in the open space preserve as applicable. Through these strategic measures to mitigate for impacts, the preserved sensitive natural communities will be managed to maintain high-quality and functioning habitat. Through these initiatives, the County DPR will demonstrate its long-term commitment to species conservation within open space preserve. <u>The full description of the measure is provided above.</u></u>	LTS

Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
		<p>MM-BIO-96: Provide Compensatory Habitat-Based Mitigation. To mitigate for potentially significant impacts on Tier I, Tier II, and Tier III habitats, the County DPR will provide compensatory mitigation consistent with its BMO to reduce significant impacts on sensitive vegetation communities. Mitigation will be provided within open space preserve and/or within offsite location(s) as summarized in Table 4.4-4. The full description of the measure is provided above.</p> <p>MM-BIO-10: Native Grassland Mitigation. Impacts on 14.79 acres of Valley needlegrass grassland will be mitigated at a 2:1 ratio through preservation of 10.60 acres of Valley needlegrass grassland and 6.88 acres of open Engelmann oak woodland on-site, in addition to 4.84 acres of restoration of non-native Valley needlegrass grassland within the County's parcel and 7.41 acres of restoration on Wright's Field Preserve. All restoration will be in accordance with a Habitat Restoration and Enhancement Plan (HREP) approved by the Wildlife Agencies (USFWS and CDFW). Success criteria established in that HREP will include achieving at least a 5 percent absolute cover of purple needlegrass within restoration areas while retaining cover and species composition similar to that of the native forbs currently present within non-native grassland areas on-site. If restoration does not meet the restoration goals, the County will implement adaptive management measures, to be approved by the Wildlife Agencies.</p>	
Impact-BIO-15: Conflicts with County Consolidated Fire Code. The project would potentially conflict with the County's Consolidated Fire Code—specifically, the provision to prevent impacts within a biological open space/preserve contained in Section 4907.2, Fuel	PS	<p>APM-BIO-1: Establishment of the Open Space Preserve The full description of the measure is provided above.</p> <p>MM-BIO-9: Provide Compensatory Habitat-Based Mitigation</p>	LTS

Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
<u>Modification (f). Impacts would be potentially significant, absent mitigation.</u>		<u>The full description of the measure is provided above.</u>	
<u>MM-BIO-10: Native Grassland Mitigation</u>			
<u>The full description of the measure is provided above.</u>			
4.5 Cultural Resources			
Impact-CUL-1: Potential to Unearth and Damage Significant Archaeological Resources During Construction. Excavation of the project has the potential to unearth and damage significant archaeological resources during construction of the project. Therefore, implementation of the project may cause a substantial adverse change in the significance of an archaeological resource as defined in State CEQA Guidelines Section 15064.5.	PS	MM-CUL-1: Prepare and Implement a Cultural Resources Monitoring and Discovery Plan. Prior to the commencement of any ground-disturbing activities within previously undisturbed soils within the project area, the County DPR shall retain a qualified archaeologist (pre-approved by County DPR) who meets the Secretary of the Interior's Professional Qualification Standards (36 Code of Federal Regulations [CFR], Part 61) to prepare a Cultural Resources Monitoring and Discovery Plan (CRMDP) for the project area. Procedures to follow in the event of an unanticipated discovery apply to all project components. The CRMDP shall be submitted to the County DPR, as applicable based on the jurisdiction wherein the project component is located, and shall be reviewed and approved by County DPR, the relevant agency. If County DPR does not have in-house expertise to review the CRMDP, they shall respectively hire an expert who meets the Secretary of the Interior's Professional Qualification Standards (36 CFR 61) and the County DPR shall pay for said expert prior to the commencement of any ground-disturbing activities within the areas requiring archaeological monitoring. County DPR's CRMDP review shall ensure that appropriate procedures to monitor construction and treat unanticipated discoveries are in place. County DPR's review and approval of the CRMDP shall occur prior to the commencement of any construction activities subject to the requirements of the CRMDP. The CRMDP shall include required qualifications for archaeological monitors and supervising archaeologists and shall lay out protocols to be	LTS

Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
		<p>followed in relation to cultural resources, including both archaeological and tribal cultural resources. The CRMDP shall provide a summary of sensitivity for buried cultural resources. In addition, it shall describe the roles and responsibilities of archaeological and Native American monitors, County DPR, and construction personnel. The CRMDP shall describe specific field procedures to be followed for archaeological monitoring, including field protocol and methods to be followed should there be an unanticipated archaeological discovery. Evaluation of resources, consultation with Native American individuals, tribes and organizations, treatment of cultural remains and artifacts, curation, and reporting requirements shall also be described. The CRMDP shall also delineate the requirements, procedures, and notification processes in the event that unanticipated human remains are encountered.</p> <p>The CRMDP shall delineate the area(s) that require archaeological monitoring. Mapping of the area(s) shall be made available to the County DPR, who shall incorporate this information into the respective construction specifications for the project.</p> <p>MM-CUL-2: Prepare and Implement a Cultural Resources Awareness Training Prior to Project Construction. Prior to, and for the duration of, project-related ground disturbance County DPR shall hire a qualified archaeologist, who meets the Secretary of the Interior's Professional Qualifications Standards (36 CFR 61) and approved by County DPR to provide cultural resources awareness training to project construction personnel. The training shall include a discussion of applicable laws and penalties under the law; samples or visual representations of artifacts that might be found in the project vicinity; and the steps that must be taken if cultural resources are encountered during construction, including the</p>	

Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
		<p>authority of archaeological monitors, if required to be on site during the project, to halt construction in the area of a discovery.</p> <p>The cultural resources awareness training shall be conducted by a qualified archaeologist. A hard copy summary of cultural resources laws, discovery procedures, and contact information shall be provided to all construction workers. Completion of the training shall be documented for all construction personnel, who shall be required to sign a form confirming they have completed the training. The form shall be retained by County DPR to demonstrate compliance with this mitigation measure.</p> <p>MM-CUL-3: Conduct Archaeological and Native American Monitoring. An archaeological monitor or cross-trained archaeological/paleontological monitor and a Native American monitor shall be retained to observe all initial ground-disturbing activities, including brush clearance, vegetation removal, grubbing, grading, and excavation, within the recorded boundaries of P-36-005695. The archaeological monitor shall meet the qualification standards of the California Office of Historic Preservation and shall be overseen by an archaeological principal investigator. The Native American monitor shall be selected from among the Native American groups identified by the NAHC as having affiliation with the project area. Prior to the start of ground-disturbing activities, the archaeological monitor shall conduct paleontological and cultural resources sensitivity training for all construction personnel. The Native American monitor or a representative shall be given the opportunity to participate. Construction personnel shall be informed of the types of paleontological or archaeological resources that may be encountered, and of the proper procedures to be enacted in the event of an inadvertent discovery of fossils, archaeological resources, or human remains. The</p>	

Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
		<p>County DPR shall ensure that construction personnel are made available for and attend the training and retain documentation demonstrating attendance.</p> <p>Archaeological monitoring shall be conducted by an archaeologist familiar with the types of archaeological resources that could be encountered within the project site and who is cross-trained in paleontological resource identification. The qualified archaeologist, in coordination with the County DPR and Native American monitor, may reduce or discontinue monitoring if it is determined that the possibility of encountering buried archaeological deposits is low based on observations of soil stratigraphy or other factors. Both the archaeologist and Native American monitor shall be empowered to halt or redirect ground-disturbing activities away from the vicinity of a discovery until the qualified archaeologist or paleontologist has evaluated the discovery and determined appropriate treatment. If prehistoric archaeological materials are encountered, the Native American monitor shall participate in any discussions involving treatment and subsequent mitigation.</p> <p>The archaeological monitor shall keep daily logs detailing the types of activities and soils observed, and any discoveries. After monitoring has been completed, the qualified archaeologist shall prepare a monitoring report that details the results of monitoring. The report shall be submitted to the County DPR and any Native American groups who request a copy. A copy of the final report shall be filed at the SCIC. Monitoring actions and procedures shall be completed per the CRMDP described in MM-CUL-1.</p>	
4.6 Energy			
Implementation of the project would not result in any potentially significant impacts related to energy.			
4.7 Geology and Soils			
Impact-GEO-1: Potential Impact on Paleontological Resources. Ground-disturbing activities that would extend deep enough to encounter previously	PS	MM-GEO-1: Implement a Paleontological Resource Mitigation Program. Ground-disturbing construction activities in the southern and western portion of the project	LTS

Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
undisturbed deposits of the Lusardi Formation in the southern and western portions of the project site would have the potential to impact paleontological resources.		<p>site shall be subject to paleontological and geologic resource sensitivity screening prior to commencement of construction. The resource sensitivity screening shall determine which ground-disturbing activities would be deep enough to encounter previously undisturbed deposits of the Lusardi Formation. County DPR shall retain a Qualified Paleontologist who shall oversee paleontological monitoring by a qualified Paleontological Monitor or cross-trained Paleontological/Archaeological monitor during ground-disturbing activities. The paleontological monitoring shall include the following measures:</p> <ul style="list-style-type: none"> • A Qualified Paleontologist shall attend the preconstruction meeting(s) to consult with the grading and excavation contractors or subcontractors concerning excavation schedules, paleontological field techniques, and safety issues. • A Qualified Paleontologist or Paleontological Monitor or cross-trained Paleontological/Archaeological Monitor shall be on site, on a full-time basis, during ground-disturbing activities that occur 10 feet or more below ground surface, to inspect exposures for contained fossils. The Paleontological Monitor shall work under the direction of the project's Qualified Paleontologist. A "Paleontological Monitor" shall be defined as an individual selected by the Qualified Paleontologist who has experience in monitoring excavation and the collection and salvage of fossil materials. • If fossils are discovered on the project site, the Qualified Paleontologist shall recover them and temporarily direct, divert, or halt grading to allow recovery of fossil remains. • The Qualified Paleontologist shall be responsible for the cleaning, repairing, sorting and cataloguing of fossil remains collected during the monitoring and salvage portion of the mitigation. 	

Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
		<ul style="list-style-type: none"> The Qualified Paleontologist shall deposit and donate prepared fossils, along with copies of all pertinent field notes, photos, and maps, in a scientific institution with permanent paleontological collections, such as the San Diego Natural History Museum, approved by County DPR. Within 30 days after the completion of excavation and pile-driving activities, a final data recovery report shall be completed by the Qualified Paleontologist and submitted to County DPR for review and approval. The final report shall document the results of the mitigation and shall include discussions of the methods used, stratigraphic section(s) exposed, fossils collected, and significance of recovered fossils. 	
4.8 Greenhouse Gas Emissions and Climate Change			
Impact-GHG-1: Generation of GHG Emissions that May Have a Significant Impact on the Environment. The project's construction activities would result in the generation of GHG emissions that could directly or indirectly have a significant impact on the environment because the project would not comply with the 2017 Scoping Plan. Impacts would be potentially significant for construction. GHG emissions from operation of the project would have a less-than-significant impact on the environment.	PS	MM-GHG-1: Implement Construction Best Management Practices. The County shall ensure implementation of the following measures during project construction: <ul style="list-style-type: none"> Require equipment to be maintained in good tune and to reduce excessive idling time. Utilize alternative fueled equipment and vehicles, such as renewable diesel, renewable natural gas, compressed natural gas, or electric. Require older equipment be retrofitted with advanced engine controls, such as diesel particulate filters, selective catalytic reduction, or cooled exhaust gas recirculation. 	LTS
Impact-GHG-2: Conflict With an Applicable Plan, Policy, or Regulation	PS	Implement mitigation measure MM-GHG-1 , as described above.	LTS
4.9 Hazards and Hazardous Materials			
Impact HAZ-1: Potential Release of Contaminated Soil. Construction of the project would potentially	PS	MM-HAZ-1: Prepare and Implement a Soil Management Plan. Prior to the commencement of soil-disturbing construction activities, the County will retain a	LTS

Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
result in the release of contaminated soil into the environment. Impacts would be potentially significant.		<p>licensed Professional Geologist, Professional Engineering Geologist, or Professional Engineer with experience in contaminated site redevelopment and restoration to prepare and submit a soil and groundwater management plan to the County for review and approval. After the County's review and approval, the County will implement the soil and groundwater management plan, to include the following:</p> <ul style="list-style-type: none"> • A Site Contamination Characterization Report (Characterization Report) delineating the vertical and lateral extent and concentration of residual contamination from the site's past uses in areas where soil would be disturbed. The Characterization Report will include a compilation of data based on historical records review and from prior reports and investigations and, where data gaps are found, include new soil and groundwater sampling to characterize the existing vertical and lateral extent and concentration of residual contamination. • A Soil Testing and Profiling Plan (Testing and Profiling Plan) for materials that will be disposed of during construction. Testing will occur for all potential contaminants of concern, including CA Title 22 metals, polycyclic aromatic hydrocarbons), volatile organic compounds, herbicides, pesticides, polychlorinated biphenyls, or any other potential contaminants, as specified within the Testing and Profiling Plan. The Testing and Profiling Plan will document compliance with CA Title 22 for proper identification and segregation of hazardous and solid waste as needed for acceptance at a CCR Title 22-compliant offsite disposal facility. All excavation activities will be actively monitored by a Registered Environmental Assessor for the potential presence of contaminated soils and compliance with the Testing and Profiling Plan. 	

Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
		<ul style="list-style-type: none"> • A Soil Disposal Plan (Disposal Plan), which will describe the process for excavation, stockpiling, dewatering, treating, loading, and hauling of soil from the site. This plan will be prepared in accordance with the Testing and Profiling Plan (i.e., in accordance with CCR Title 22, CCR Title 27, DOT Title 40 CFR Part 263,), and current industry best practices for the prevention of cross-contamination, spills, or releases. Measures will include, but not be limited to, segregation into separate piles for waste profile analysis based on organic vapor and visual and odor monitoring. • A Site Worker Health and Safety Plan (Safety Plan) to ensure compliance with 29 CFR Part 120, Hazardous Waste Operations and Emergency Response, regulations for site workers at uncontrolled hazardous waste sites. The Safety Plan will be based on the characterization report and the planned site construction activity to ensure that site workers potentially exposed to contamination in soil are trained, equipped, and monitored during site activities. The training, equipment, and monitoring activities will ensure that workers are not exposed to contaminants above personnel exposure limits established by Table Z, 29 CFR Part 1910.1000. The Safety Plan will be signed by and implemented under the oversight of a California State Certified Industrial Hygienist 	

4.10 Hydrology and Water Quality

Implementation of the project would not result in any potentially significant impacts related to hydrology and water quality.

4.11 Land Use and Planning

Implementation of the project would not result in any potentially significant impacts related to land use and planning.

4.12 Mineral Resources

Implementation of the project would not result in any potentially significant impacts related to mineral resources.

Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
4.13 Noise and Vibration			
Impact-NOI-1: Construction Noise During Installation of the Sewer System. Predicted noise levels associated with construction for the park would comply with the County's 8-hour L_{eq} standard of 75 dBA. However, construction associated with the extension of the sewer system would exceed the County's 8-hour threshold for construction noise. As such mitigation would be required to reduce impacts to less than significant. To address noise impacts from construction of the proposed sewer extension, installation of a barrier that breaks the line of sight between the source and receiver would provide 5 dB noise attenuation (FHWA 2017).	PS	MM-NOI-1: Install Temporary Sound Barriers. Prior to and during construction activities for the proposed sewer line extension, the construction contractor shall install temporary sound barriers that break the line of sight (a minimum of 10 feet) between construction equipment and noise-sensitive receivers. These soundwalls shall be installed at any location where construction is located within 100 feet of the property line of an occupied residence or other noise-sensitive land use, such as schools.	LTS
Impact-NOI-2: Onsite Operational Noise at the Active Park. Although the Noise Impact Analysis did not identify any significant impacts, a number of best practices and operational controls would be in place during the operation of the Alpine Park and were assumed as part of the analysis. These are based on typical rules and regulations enforced at existing County parks.	<u>PS</u>	MM-NOI-2: Enforce Standard Rules and Regulations. County DPR shall enforce all applicable standard rules and regulations for DPR facilities including, but not limited to, the following: <ul style="list-style-type: none"> • Quiet Hours are from 10:00 p.m. to 7:00 a.m. • Dogs must be licensed and restrained on a leash not longer than 6 feet and attended at all times. (This restriction will not apply to dogs within the designated dog park space.) • No person shall disturb the peace and quiet of a County park by any loud or unusual noise, or by the sounding of automobile horns or noise-making devices, or by the use of profane, obscene, or abusive language or gestures. • No person shall use, transport, carry, fire, or discharge any fireworks, firearm, weapon, air gun, archery device, slingshot, or explosive of any kind across, in, or into a County park. 	<u>LTS</u>

Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
	<u>PS</u>	<ul style="list-style-type: none"> The applicable requirements of DPR Policy Number C-06, Noise Regulation in County Parks will be enforced. <p>MM-NOI-3: Set Operational Limits and Restrictions. Except for occasional special events conducted pursuant to a specific permit (conditional use permit, special event permit, etc.), enforce the following operational restrictions:</p> <ul style="list-style-type: none"> Prohibit the use of noise-generating equipment (noise-makers, bullhorns, air horns, amplified stereos/radios, etc.) by spectators. The only exception is for official use of the announcer's PA systems or other devices required for proper operation of the intended and approved activities. End all onsite events no later than 10:00 p.m. 	<u>LTS</u>
4.14 Population and Housing			
Implementation of the project would not result in any potentially significant impacts related to population and housing.			
4.15 Public Services			
Implementation of the project would not result in any potentially significant impacts related to public services.			
4.16 Recreation			
Implementation of the project would not result in any potentially significant impacts related to recreation.			
4.17 Transportation and Circulation			
Implementation of the project would not result in any potentially significant impacts related to transportation and circulation.			

Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
4.18 Tribal Cultural Resources			
Impact-TCR-1: Excavation Related to the Project Would Potentially Damage Tribal Cultural Resources. Ground-disturbing construction activities associated with the project have the potential to unearth unknown TCRs that may be located in the project area. Impacts would be potentially significant.	PS	Implement mitigation measures MM-CUL-1; MM-CUL-2; and MM-CUL-3 , as described above. MM-TCR-1: Conduct Native American Monitoring. A Kumeyaay Native American monitor shall be present at all areas of proposed ground disturbance during all initial ground disturbance. This monitoring shall occur on an as-needed basis and is intended to ensure that Native American concerns are considered during the construction process. Native American monitors would be retained from tribes who have expressed an interest in the project and have participated in discussions with County DPR. If a tribe has been notified of scheduled construction work and does not respond, or if a Native American monitor is not available, work may continue without the Native American monitor. Roles and responsibilities of the Native American monitors shall be detailed in the Cultural Resources Monitoring and Discovery Plan described in MM-CUL-1. Costs associated with Native American monitoring shall be borne by County DPR.	LTS
4.19 Utilities and Service Systems			
Impact-UTIL-1: Operation of the Project Has the Potential to Require New or Expanded Water Facilities. Operation of the project would increase demand on water infrastructure serving the project site, potentially requiring the relocation or construction of new or expanded water facilities to serve proposed uses. Construction of these facilities could result in physical impacts on the environment.	PS	MM-UTIL-1: Complete Water Study to Assess Water Infrastructure Capacity. Prior to issuance of a building permit, County DPR shall coordinate with PDMWD to assess the capacity of existing water infrastructure that would serve the project site and, if it is determined that insufficient capacity exists to serve the project, the project proponent shall implement the necessary improvements prior to operation of the project, as determined by PDMWD. Should it be determined that the project would result in the need for new or expanded water facilities, the project proponent shall analyze the potential environmental effects of the improvements in accordance with CEQA. -	LTS

Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
Impact-UTIL-2: Insufficient Water Supplies Available to Serve the Project During Operation. Due to the potential increase in water demand as a result of implementation of the project, PDMWD cannot guarantee that at some point in the future, supply of imported water would not be diminished. Therefore, given this uncertainty regarding available water supply, which is necessary for operation of the project, potential impacts are considered to be significant.	PS	MM-UTIL-2: Confirm Water Supply Availability for Development of the Project Prior to Issuance of Building Permits. Water availability shall be confirmed prior to issuance of building permits. The confirmation of water availability by PDMWD shall be provided in written form by PDMWD.	LTS
4.20 Wildfire			
Implementation of the project would not result in any potentially significant impacts related to wildfire.			

4.4.1 Overview

This section describes existing conditions at the project site, applicable laws and regulations with respect to biological resources, the biological resources present within the project site, and the impacts and mitigation measures required for implementation of the project.

4.4.2 Existing Conditions

A biological resource analysis was conducted for the project by reviewing literature and records from available databases and resources and conducting biological resource surveys within the Biological Survey Area (BSA). The BSA includes the entirety of the approximately 96.6-acre project site. Note that only 94.2 net acres required surveys because 2.4 acres of the parcel is within the public right-of-way along South Grade Road. Vegetation surveys, special-status plant surveys, and invasive plant mapping were conducted in February and March 2019. Special-status plant surveys and special-status wildlife surveys were conducted in the BSA between February and September 2019, with the second-year Quino checkerspot butterfly (QCB) (*Euphydryas editha quino*) study conducted in March 2020 and a specialized survey for chocolate lily (*Fritillaria biflora*) conducted in late March 2021. Additional Engelmann oak surveys and mapping were conducted in June and September 2020. An additional vegetation survey was conducted in June and July 2022 to update vegetation conditions within the BSA and confirm that the mapping met a 0.10-acre minimum mapping unit requirement. Focused surveys for western spadefoot were also conducted in 2022. The methods used during these biological resource surveys are provided in the Biological Resources Report (BRR), which is included as Appendix D to this EIR.

4.4.2.1 Physical Conditions

The BSA is in the central foothills of San Diego County, within the unincorporated community of Alpine. The natural setting of the southern portion of the BSA consists of relatively flat grasslands that slope slightly from northeast to a low point to the southwest. The terrain is rougher to the north; boulders and rock outcrops are dominated by scrub, chaparral, and woodland vegetation. Furthermore, the hills are steeper to the north; a small hilltop is present just east of the northeast corner of the BSA. Land surrounding the BSA is relatively flat, partially because of grading for developments. Steeper mountains with canyons, ravines, and drainages are found farther to the north and the south, outside of Alpine. Nearby reservoirs include El Capitan Reservoir to the north and Loveland Reservoir to the south. Elevations range from approximately 1,900 feet above mean sea level at the southwest corner of the BSA along South Grade Road to approximately 2,100 feet above mean sea level at the northeast corner of the BSA.

Several dirt trails traverse the BSA, most notably in the northern portion. Other trails connect the eastern portion of the property, in areas where many hikers begin their treks to the north, south,

and west and into Wright's Field. South Grade Road, a paved two-lane road, borders the BSA to the south and east.

4.4.2.2 Current Fire Fuel Reduction Zones

In accordance with the County Consolidated Fire Code and the Alpine Fire Protection District Ordinance, the County is clearing vegetation within the fire fuel reduction zones listed below, which, historically, have been cleared per the direction of the Alpine Fire District. These recommendations are also contained within the Fire and Emergency Operational Assessment (FEOA) prepared by Rohde & Associates.

- At the far northeast edge of the County's parcel where it abuts residences along Engelmann Oak Lane, 100 feet south of their property lines. This area is currently cleared of all vegetation and mapped as disturbed habitat.
- Along South Grade Road, within 30 feet of the edge of the road. This area along the County's parcel includes predominantly Valley needlegrass grassland and smaller stands of open Engelmann oak woodland at the northern and eastern edges that transitions to denser scrub vegetation. Moderate to steep slopes are found toward the southern and western edges of the County's parcel. No Engelmann oaks have been removed as part of clearing, but the trees are limbed in coordination with a certified arborist, as needed, to prevent wildfires from spreading along contiguous tree canopies.

4.4.2.3 Vegetation Communities/Land Cover

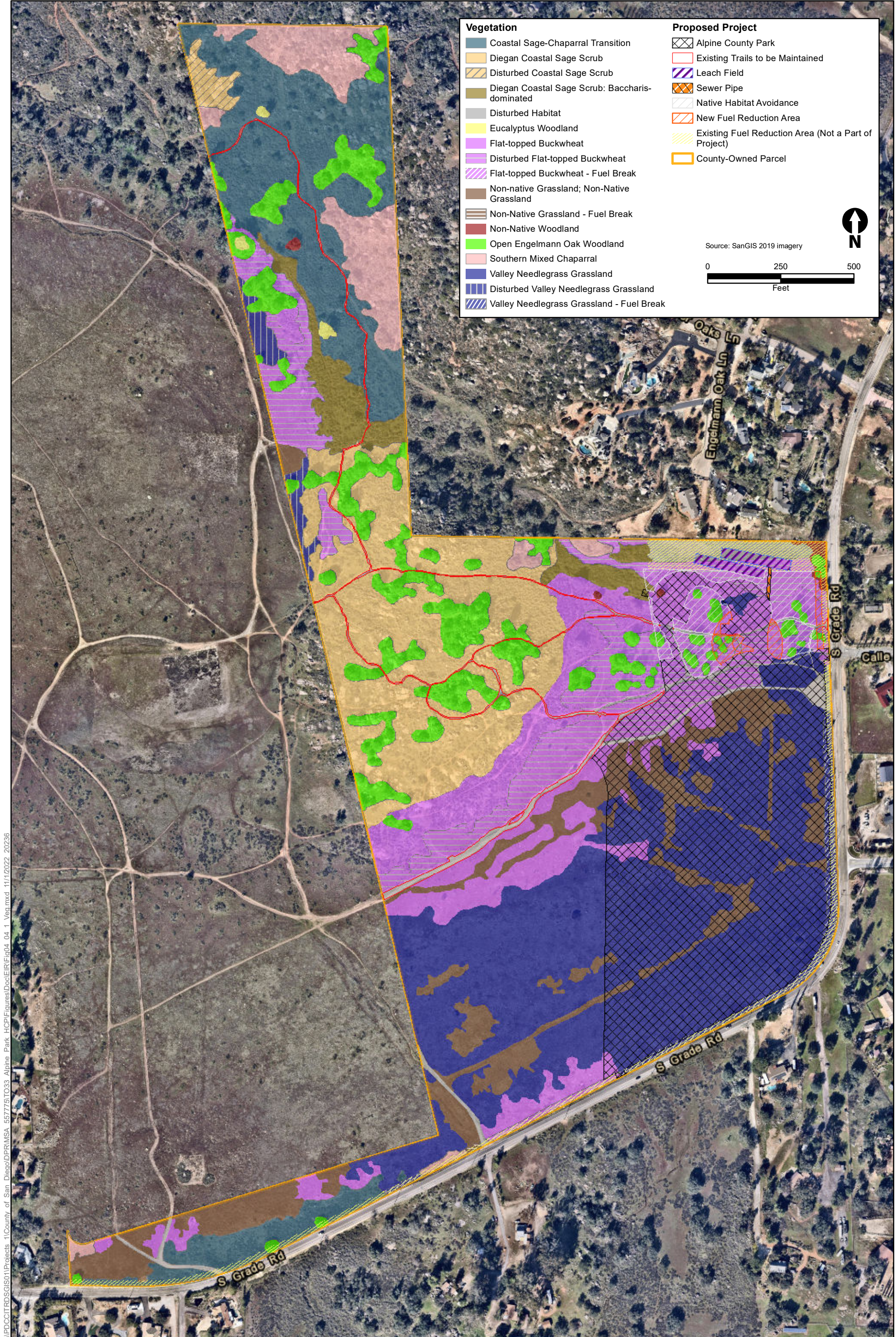
Vegetation mapping within the BSA was conducted by ICF biologists in February and March 2019 by walking meandering transects and observing the area from selected vantage points that allowed an expansive view of the BSA. An additional vegetation survey was conducted in June and July 2022 to update vegetation conditions within the BSA and confirm that the mapping met a 0.10-acre minimum mapping unit requirement.

Vegetation communities were mapped pursuant to County guidelines (County of San Diego 2010b). These communities were described and assigned numerical codes, according to the *Terrestrial Natural Communities of California* (Holland 1986), as modified by Oberbauer et al. (2008). The 11 general vegetation communities/land cover types observed within the BSA were disturbed habitat; Diegan coastal sage scrub; Diegan coastal sage scrub, *Baccharis* dominated; flat-topped buckwheat; coastal sage-chaparral transition; southern mixed chaparral; Valley needlegrass grassland; non-native grassland; open Engelmann oak woodland; non-native woodland; and eucalyptus woodland (Figure 4.4-1; Table 4.4-1). A full description of each vegetation community/land cover type present within the BSA can be found in the BRR, which is included as Appendix D to this EIR. Valley needlegrass grassland is the most common vegetation community, composing approximately 26.1 acres of the BSA.

Table 4.4-1. Vegetation Communities Occurring Within the BSA

Oberbauer Code	Vegetation Community	Area in BSA (acres)
11300	Disturbed Habitat	2.7
32500	Diegan Coastal Sage Scrub	12.2
	Disturbed Diegan Coastal Sage Scrub	0.5
32530	Diegan Coastal Sage Scrub, Baccharis dominated	2.5
32800	Flat-topped Buckwheat	10.1
	Disturbed Flat-topped Buckwheat	9.1
	Flat-topped Buckwheat – Existing Fire Fuel Reduction Zone	0.2
37G00	Coastal Sage-Chaparral Transition	11.0
37120	Southern Mixed Chaparral	4.0
42110	Valley Needlegrass Grassland	24.4
	Disturbed Valley Needlegrass Grassland	0.7
	Valley Needlegrass Grassland – Existing Fire Fuel Reduction Zone	1.1
42200	Non-Native Grassland	8.4
	Non-native Grassland – Existing Fire Fuel Reduction Zone	< 0.1
71181	Open Engelmann Oak Woodland	7.1
79000	Non-Native Woodland	0.2
79100	Eucalyptus Woodland	0.1
Total ^{1a}		94.2

^a. Sum of values does not equal total because of rounding.



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Figure 4.4-1
Vegetation Communities
Alpine Park Project

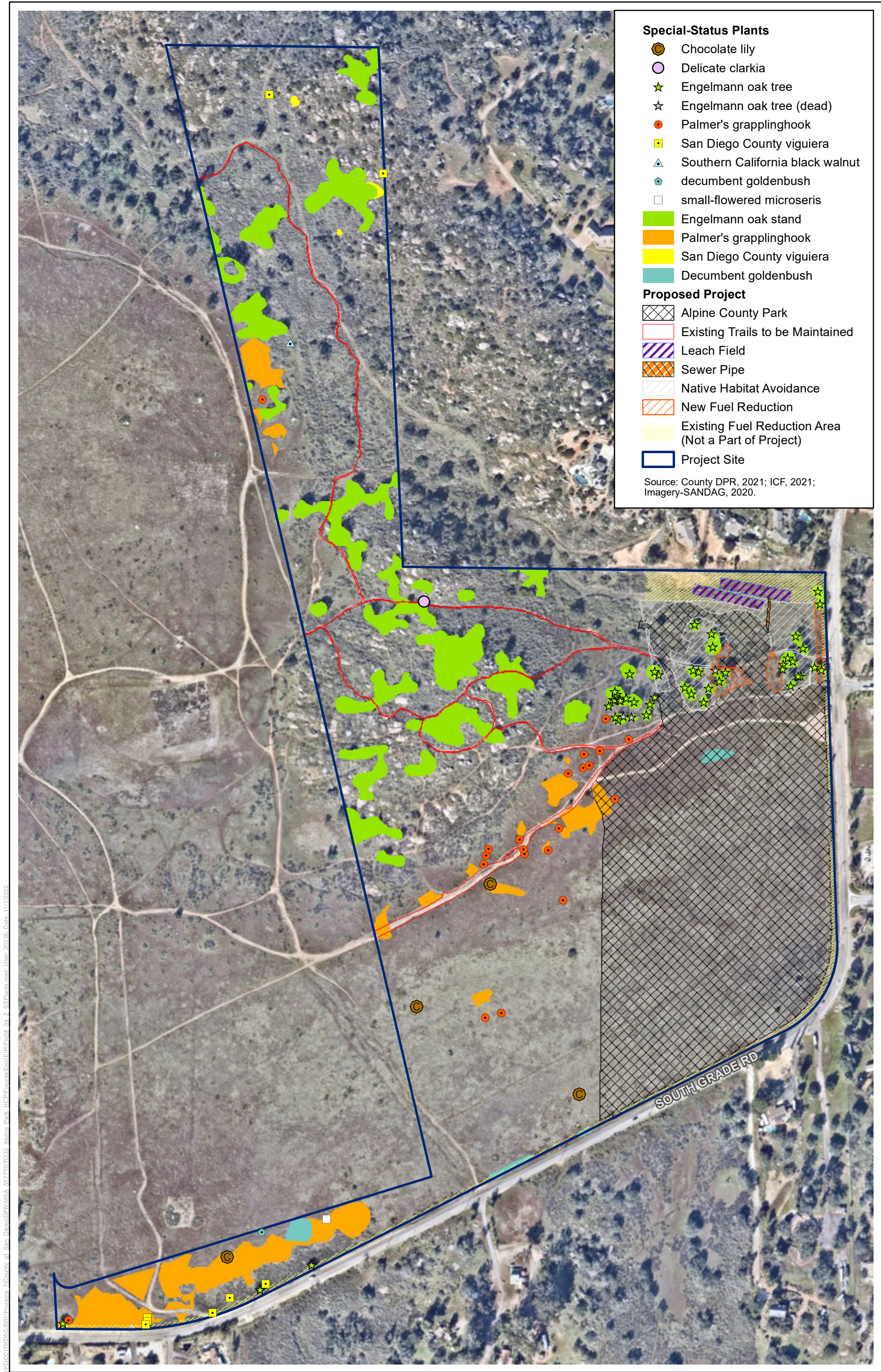
4.4.2.4 Candidate, Sensitive, and Special-Status Species

Special-status species are those plants or animals that have been officially listed, proposed for listing, or identified as candidates for listing as threatened or endangered under provisions of the federal Endangered Species Act (ESA) and the California Endangered Species Act (CESA). Included is any animal listed as a Species of Special Concern or a fully protected species by the state or any plant ranked according to the Rare Plant Ranking System of the California Native Plant Society (CNPS). Special-status species also include those listed on the County's Sensitive Plant List and Sensitive Animal List.

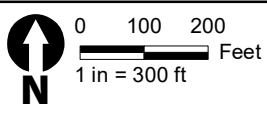
Special-Status Plant Species

The desktop analysis for sensitive plant species was performed for this project by reviewing the California Natural Diversity Database (CNDDB) and CNPS database. The CNDDB and CNPS record search for sensitive plant species was conducted using the U.S. Geological Survey's Alpine 7.5-minute quadrangle map and the nine surrounding quadrangle maps. The search identified 83 species with potential to occur within the BSA (see Appendix I of the BRR, which is included as Appendix D to this EIR).

Special-status plant surveys were conducted within the BSA by qualified ICF botanists between April and August 2019. ICF botanists traversed the BSA from meandering transects to identify the locations of special-status plants. A specialized survey for chocolate lily (*Fritillaria biflora*) was conducted in late March of 2021, during the peak time for this species to bloom throughout the BSA. Species that were not observed within the BSA were determined to have little to no potential to occur on site because three thorough special-status plant surveys were conducted in 2019, which was an excellent rain year for Southern California. The surveys concluded that no federally or state-listed endangered or threatened plant species were observed within the BSA. The following eight sensitive plant species were observed in the BSA, including seven sensitive plant species from listed in the CNPS-California Rare Plant Inventory Ranking (CRPR) and in the County Sensitive Plant Lists, and one species only listed on County List D (Figure 4.4-2). Decumbent goldenbush (*Isocoma menziesii* var. *decumbens*) and delicate clarkia (*Clarkia delicata*) are listed as CRPR 1B.2 and County List A. The seven sensitive species Five plants of limited distribution are listed as CRPR 4 and County List D including were decumbent goldenbush (*Isocoma menziesii* var. *decumbens*), delicate clarkia (*Clarkia delicata*), Engelmann oak (*Quercus engelmannii*), Palmer's grapplinghook (*Harpagonella palmeri*), San Diego County viguiera (*Bahiopsis laciniata*), small-flowered microseris (*Microseris douglasii* ssp. *platycarpa*), and Southern California black walnut (*Juglans californica*). Chocolate lily (*Fritillaria biflora*), which was observed within the BSA, is a County List D plant, indicating it has a limited distribution or is uncommon but not presently rare or endangered. A complete list of potentially occurring special-status plants is provided in Appendix I of the BRR (Appendix D to this EIR).



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Special-Status Wildlife Species

Following a thorough literature and records search (see the BRR, which is included as Appendix D to this EIR), special-status wildlife surveys for the project were conducted between February and September 2019, with second-year of QCB and Hermes copper butterfly (HCB) (*Lycaena hermes*) studies conducted in 2020. ICF biologists conducted focused wildlife surveys for locally endemic and listed San Diego and Riverside fairy shrimp (*Streptocephalus woottoni*, *Branchinecta sandiegonensis*), QCB, HCB, burrowing owl (*Athene cunicularia*), coastal California gnatcatcher (CAGN) (*Polioptila californica californica*), and locally endemic listed bat species. In 2022, focused surveys for western spadefoot were conducted, verification and refinement to the vegetation map was completed, and an additional bat survey was conducted. The BRR (Appendix D to this EIR) provides details on the methods used for these surveys. QCB was observed during both 2019 and 2020 (Figure 4.4-3).

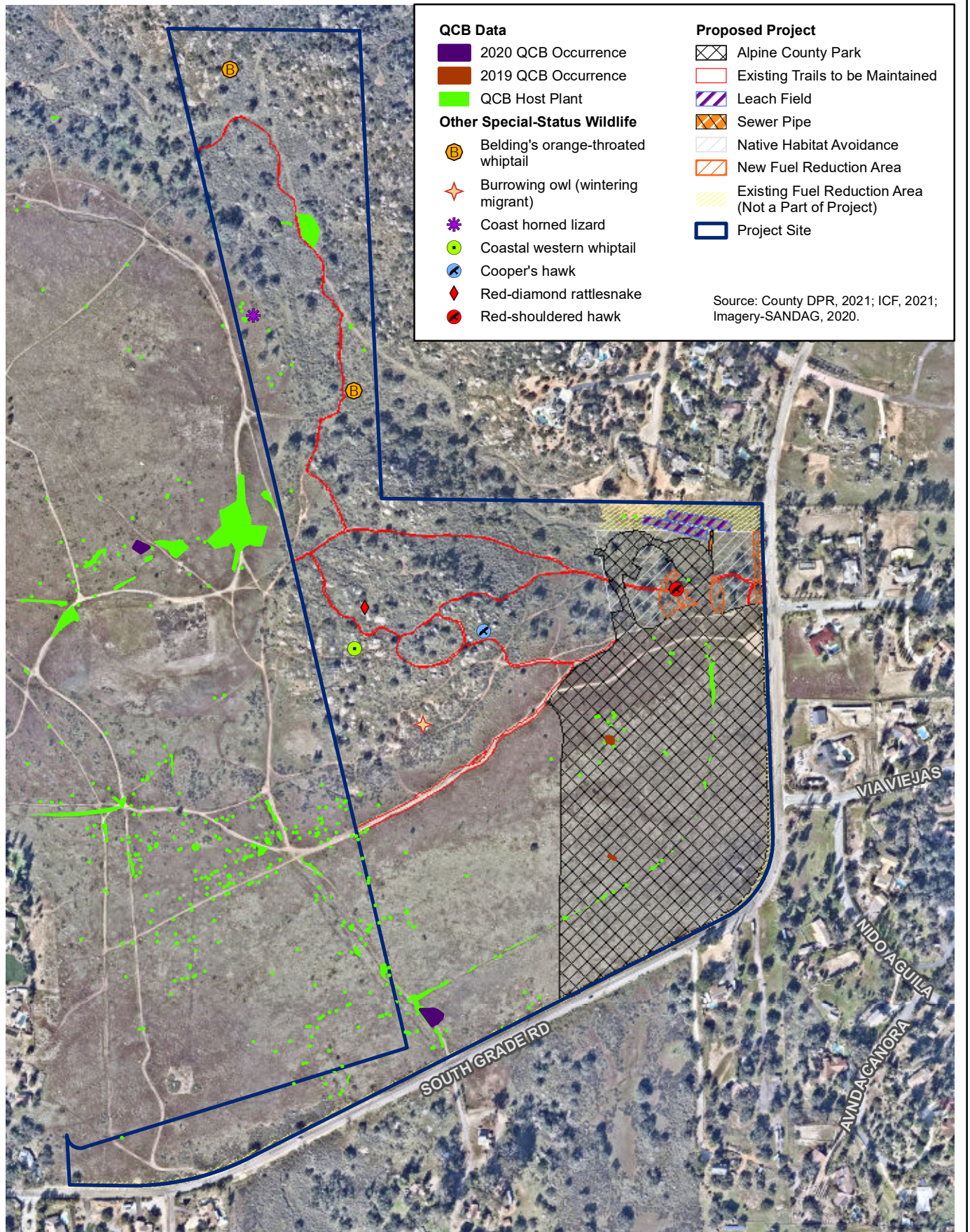
The following special-status bats were observed during bat surveys: big free-tailed bat (*Nyctinomops macrotis*), pallid bat (*Antrozous pallidus*), pocketed free-tailed bat (*Nyctinomops femorosaccus*), Townsend's big-eared bat (*Corynorhinus townsendii*), western long-eared myotis (*Myotis evotis*), western mastiff bat (*Eumops perotis*), western red bat (*Lasiurus blossevillei*), western small-footed myotis (*Myotis ciliolabrum*), western yellow bat (*Lasiurus xanthinus*), and Yuma myotis (*Myotis yumanensis*). Western spadefoot adults were observed within the BSA but outside the project footprint. No evidence of breeding western spadefoot was observed in 2022. In 2019, which was an exceptionally wet year, western spadefoot eggs were observed within one seasonally inundated basin during one survey.

The following special-status wildlife species were incidentally observed within the BSA during surveys conducted in 2019 and 2020: Belding's orange-throated whiptail (*Aspidoscelis hyperythra*), Blainville's (coast) horned lizard (*Phrynosoma blainvillii*), coastal western whiptail (*Aspidoscelis tigris stejnegeri*), red-diamond rattlesnake (*Crotalus ruber*), a wintering migrant burrowing owl, Cooper's hawk (*Accipiter cooperii*), red-shouldered hawk (*Buteo lineatus*), and western bluebird (*Sialia mexicana*) (Figure 4.4-3).

Although not observed, the following special-status species were determined to have moderate or high potential to occur within the BSA, based on habitat types and range distribution: Baja California coachwhip (*Masticophis fuliginosus*), California glossy snake (*Arizona elegans occidentalis*), coast patch-nosed snake (*Salvadora hexalepis virgulata*), Coronado skink (*Plestiodon skiltonianus interparietalis*), Southern California legless lizard (*Anniella stebbinsi*), Bell's sage sparrow (*Artemisospiza belli belli*), burrowing owl (breeding occurrence), ferruginous hawk (*Buteo regalis*), grasshopper sparrow (*Ammodramus savannarum*), Lawrence's goldfinch (*Spinus lawrencei*), Oregon vesper sparrow (*Pooecetes gramineus affinis*), Southern California rufous-crowned sparrow (*Aimophila ruficeps canescens*), white-tailed kite (*Elanus leucurus*), northwestern San Diego pocket mouse (*Chaetodipus fallax fallax*), San Diego black-tailed jackrabbit (*Lepus californicus bennettii*), and Bryant's (San Diego desert) woodrat (*Neotoma bryanti*).

Protocol surveys for both listed fairy shrimp and CAGN were negative. Based on survey results and a literature review, the following species were determined to have low potential to occur; therefore, impacts on these species are not evaluated in this EIR: HCB, locally endemic and listed San Diego and Riverside fairy shrimp, and CAGN. Appendix I in the BRR (Appendix D to this EIR) provides a complete discussion regarding all special-status wildlife species with potential to occur and those that were observed.

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0 250 500
1 in = 500 ft Feet

Figure 4.4-3
Special-Status Wildlife
Alpine Park Project

4.4.2.5 Jurisdictional Waters and Wetlands

During the vegetation mapping conducted in February and March 2019, ICF biologists searched the BSA for any indication of surface water flows to determine if a delineation of potentially jurisdictional aquatic features was required. No such surface water features were observed on-site; as a result, no formal delineation of jurisdictional water features was required or conducted.

4.4.3 Applicable Laws and Regulations

4.4.3.1 Federal

Endangered Species Act of 1973

The ESA was enacted in 1973 to provide protection to threatened and endangered species and their associated ecosystems. “Take” of a listed species is prohibited, except when authorization has been granted through a permit under Section 4(d), 7, or 10(a) of the act. *Take* means to harass, harm, shoot, wound, kill, trap, capture, or collect or to attempt to engage in any of these activities without a permit.

Migratory Bird Treaty Act

The Migratory Bird Treaty Act (MBTA) was enacted in 1918. Its purpose is to prohibit the killing or transport of covered native migratory birds—or any part, nest, or egg of any such bird—unless allowed by another regulation adopted in accordance with the MBTA. The list of species that are protected by this act includes almost all native non-game species.

Clean Water Act

In 1948, Congress first passed the Federal Water Pollution Control Act. This act was amended in 1972 and became known as the Clean Water Act (CWA). The CWA regulates the discharge of pollutants into the waters of the U.S. Under Section 404, permits need to be obtained from the U.S. Army Corps of Engineers (USACE) for discharge of dredge or fill material into waters of the U.S. Under Section 401 of the act, water quality certification from the Regional Water Quality Control Board (RWQCB) needs to be obtained if there are to be any impacts on waters of the U.S.

4.4.3.2 State

California Endangered Species Act

The CESA prohibits the take of any species that the California Fish and Game Commission determines to be a threatened or endangered species; CESA is administered by the California Department of Fish and Wildlife (CDFW). The CESA is found in California Fish and Game Code (FGC) Sections 2050–2116. Incidental take of these listed species can be approved by CDFW. The CESA definition of take means to hunt, pursue, catch, capture, or kill or attempt to hunt, pursue, catch, capture, or kill.

California Fish and Game Code

The California FGC regulates the taking or possessing of birds, mammals, fish, amphibians, and reptiles. It also provides additional protections for endangered species and regulations regarding lakes and streams and associated fish and wildlife habitat. Provisions regarding the protections for nesting birds are described in California FGC Section 3503; these make it unlawful to take, possess, or needlessly destroy the nest or eggs of most wild birds.

4.4.3.3 Local

County General Plan

The 2011 County General Plan Update is the first comprehensive update to the County General Plan since the 1970s. The County General Plan Update, which applies to all unincorporated portions of San Diego County, directs population growth and provides plans for infrastructure needs, development, and resource protection. The County General Plan Update guides the growth and development of unincorporated San Diego County by using innovative planning principles that have been designed to create livable communities and balance environmental objectives with the need for adequate infrastructure, housing, agriculture, and economic viability. The County General Plan Update consists of six elements: Land Use, Mobility, Housing, Conservation and Open Space, Safety, and Noise.

The goals and policies from the County General Plan listed below are applicable to the discussion of biological resources.

Land Use

GOAL LU-2 Maintenance of the County's Rural Character. Conservation and enhancement of the unincorporated County's varied communities, rural setting, and character.

LU-2.2 Relationship of Community Plans to the General Plan. Community Plans are part of the General Plan. These plans focus on a particular region or community within the overall General Plan area. They are meant to refine the policies of the General Plan as they apply to a smaller geographic region and provide a forum for resolving local conflicts. As legally required by state law, Community Plans must be internally consistent with General Plan goals and policies of which they are a part. They cannot undermine the policies of the General Plan. Community Plans are subject to adoption, review and amendment by the Board of Supervisors in the same manner as the General Plan.

LU-2.8 Mitigation of Development Impacts. Require measures that minimize significant impacts to surrounding areas from uses or operations that cause excessive noise, vibrations, dust, odor, aesthetic impairment and/or are detrimental to human health and safety.

GOAL LU-6 Development—Environmental Balance. A built environment in balance with the natural environment, scarce resources, natural hazards, and the unique local character of individual communities.

LU-6.1 Environmental Sustainability. Require the protection of intact or sensitive natural resources in support of the long-term sustainability of the natural environment.

LU-6.6 Integration of Natural Features into Project Design. Require incorporation of natural features (including mature oaks, indigenous trees, and rock formations) into proposed development and require avoidance of sensitive environmental resources.

LU-6.7 Open Space Network. Require projects with open space to design contiguous open space areas that protect wildlife habitat and corridors; preserve scenic vistas and areas; and connect with existing or planned recreational opportunities.

GOAL LU-10 Function of Semi-Rural and Rural Lands. Semi-Rural and Rural Lands that buffer communities, protect natural resources, foster agriculture, and accommodate unique rural communities.

LU-10.2 Development—Environmental Resource Relationship. Require development in Semi-Rural and Rural areas to respect and conserve the unique natural features and rural character, and avoid sensitive or intact environmental resources and hazard areas.

Conservation and Open Space

GOAL COS-2 Sustainability of the Natural Environment. Sustainable ecosystems with long-term viability to maintain natural processes, sensitive lands, and sensitive as well as common species, coupled with sustainable growth and development.

COS-2.1 Protection, Restoration and Enhancement. Protect and enhance natural wildlife habitat outside of preserves as development occurs according to the underlying land use designation. Limit the degradation of regionally important natural habitats within the Semi-Rural and Rural Lands regional categories, as well as within Village lands where appropriate.

COS-2.2 Habitat Protection through Site Design. Require development to be sited in the least biologically sensitive areas and minimize the loss of natural habitat through site design.

GOAL COS-21 Park and Recreational Facilities. Park and recreation facilities that enhance the quality of life and meet the diverse active and passive recreational needs of County residents and visitors, protect natural resources, and foster an awareness of local history, with approximately ten acres of local parks and 15 acres of regional parks provided for every 1,000 persons in the unincorporated County.

COS-21.4 Regional Parks. Require new regional parks to allow for a broad range of recreational activities and preserve special or unique natural or cultural features when present.

COS-21.5 Connections to Trails and Networks. Connect public parks to trails and pathways and other pedestrian or bicycle networks where feasible to provide linkages and connectivity between recreational uses.

GOAL COS-23 Recreational Opportunities in Preserves. Acquisition, monitoring, and management of valuable natural and cultural resources where public recreational opportunities are compatible with the preservation of those resources.

COS-23.1 Public Access. Provide public access to natural and cultural (where allowed) resources through effective planning that conserves the County's native wildlife, enhances and restores a continuous network of connected natural habitat and protects water resources.

Alpine Community Plan

The Alpine Community Plan (ACP) implements the goals and policies of the County General Plan for the Alpine area (County of San Diego 1979). The plan was prepared in accordance with Section 65101 of the Government Code, State of California, and Board of Supervisors Policy I-1. The ACP represents a specific guide for land use, conservation, and circulation; a guide for use by service delivery specialists; and recommendations to facilitate the coordination of plans of other public agencies as well as the private sector. The goals, policies, and recommendations listed below from the ACP are applicable to land use.

Chapter 1, Community Character

Policy/Recommendation 1: Regulatory agencies shall ensure that future projects are consistent with the goals, policies and recommendations contained in the Alpine Community Plan. [PP]

Policy/Recommendation 4: Site designs should:

- a. Grading shall not unduly disrupt the natural terrain, or cause problems associated with runoff, drainage, erosion, or siltation. Landscape disturbed by grading shall be revegetated. [PP, C, DPW]
- b. Have grading plans that maximize retention of sensitive native vegetation, existing tree stands, and rock outcroppings, and natural topography. [PP, DPW]

Policy/Recommendation 6: Require retention of mature trees in all public and private development projects, wherever possible. [PP, DPW]

Chapter 9, Conservation

Goal 1: Promote the well-planned management of all valuable resources, natural and man-made, and prevent the destruction and wasteful exploitation of natural resources, where feasible.

Policy/Recommendation 1: Encourage the protection and conservation of unique resources in the Alpine Planning Area. [AP]

Policy/Recommendation 2: Important plant, animal, mineral, water, cultural and aesthetic resources in the Alpine Plan area shall be protected through utilization of the Resource Conservation Area designations and appropriate land usage. [AP]

Policy/Recommendation 6: Utilize all measures to preserve rare, threatened, or endangered plant life, including on-site protection through open space easement. Off-site propagation for reintroduction of suitable habitat to be coordinated by the Conservation Subcommittee. [AP, PP]

Policy/Recommendation 7: Protect the rare Engelman [sic] oak, wherever possible. [AP, PP]

Chapter 10, Open Space

Goal: Provide a system of open space that preserves the unique natural elements of the community, retains and extends areas in open space that are recognized as valuable for conservation of resources, open space uses that promote public health and safety. Open space areas, along with

areas which are inappropriate for urbanization or required as buffers for urban development, that harmonize with and help integrate conservation and recreation components, creating a well-balanced community of natural plant and animal habitat and humans alike.

Policy/Recommendation 1: Encourage the development and preservation of a system of open space for wildlife corridors linking residential areas to permanent open space in the Cleveland National Forest and nearby lakes and wildlife preservation areas. [County DPR, AP]

Policy/Recommendation 3: Incorporation of open space areas as integral parts of project site designs, preserving environmental resources, providing recreation for residents, and buffers to maintain neighborhood identities. [PP]

Policy/Recommendation 5: Incorporate publicly-owned land into a functional recreation/open space system, wherever feasible. [County DPR, AP]

Policy/Recommendation 11: Enhance health and safety and conserve natural resources through the preservation of open space. [GEN, County DPR, AP]

Policy/Recommendation 12: Provide recreational opportunities through the preservation of open space areas. [County DPR, AP]

Policy/Recommendation 13: Preserve and encourage publicly and privately-owned open space easements. [County DPR, AP]

Chapter 11, Recreation

Policy/Recommendation 9: Encourage the acquisition and development of park lands which will protect outstanding scenic and riparian areas, cultural, historical and biological resources. [County DPR, PP]

4.4.4 Project Impact Analysis

This section addresses direct and indirect impacts on biological resources that would result from implementation of the project. The impact analysis is focused on project components that would occur within the BSA, including fire management activities, construction and operation of Alpine Park, formalization of approximately 1 acre of existing multi-use trails, establishment of a Native Habitat Avoidance Area, construction of public restroom facilities, and establishment of an open space/preserve on the project site. Each component is described in detail below:

- **Alpine Park:** The County DPR is proposing development of Alpine Park, an approximately 22.2-acre active park within 96.6 acres of undeveloped land. The active park would include amenities such as multi-use turf areas, a baseball field, an all-wheel park, a bike skills area, recreational courts (i.e., basketball, pickleball), fitness stations, a leash-free dog area, restroom facilities, an administrative facility/ranger station, equestrian staging area and a corral, a nature play area, a community garden, a volunteer pad, picnic areas with shade structures and picnic tables, game table plaza, and multi-use trails.
- **New Fire Fuel Reduction Zones:** In accordance with the County Consolidated Fire Code and the Alpine Fire Protection District Ordinance, the County will clear vegetation along South Grade Road, providing an additional 20 feet beyond the existing 30-foot fire fuel modification zone

along South Grade Road where it is adjacent to the project footprint and north to the end of the County parcel (see Section 4.4.2.2). The County will also clear vegetation within 100 feet of the volunteer parking pad in the northern portion of the proposed park. This includes “landscape replacement” clearing within 30 feet of the volunteer parking pad in Zone A. No Engelmann oaks are in this zone. Within Zone B, the County will achieve a 75 percent reduction in fire-line intensity out to approximately 100 feet from the volunteer parking pad. Zone B fire fuel reductions will include removing shrub fuels (predominantly flat-topped buckwheat) by a minimum of 50 percent and grass/herb fuels by a minimum of 80 percent. Four Engelmann oak canopies are located in Zone B areas, and three Engelmann oak canopies are located within the additional 20-foot-wide clearing along South Grade Road as described above. Although Engelmann oaks will not be removed for fire fuel reduction purposes, these oaks may be limbed to prevent fire from spreading through the canopies, as needed, in coordination with a certified arborist. These recommendations are also contained in the FEOA prepared by Rohde & Associates, provided as Appendix J of this EIR.

- **Multi-Use Trails:** In addition to the active park, the project would result in the maintenance of 1 acre of existing multi-use trails throughout the project site. A number of smaller informal trails that are currently in use will be closed as part of the project, as well.
- **Native Habitat Avoidance Area:** These areas are within the generalized boundary of Alpine Park, but they would not be subject to mass grading or vegetation removal during site preparation activities. These areas are at the northern end of the proposed park, adjacent to the proposed equestrian staging area.
- **Public Restroom Facilities:** Implementation of the project would include construction of public restroom facilities. The County DPR may implement a septic system and associated leach field to accommodate sewage from the proposed restroom facilities. Another option under consideration is for the County DPR to extend a sewer line into the proposed Alpine Park, which would preclude the need for the septic system. For purposes of this analysis, both the sewer line and septic system are considered.
- **Open Space/Preserve:** Approximately 67.5 acres of the undeveloped 96.6-acre parcel would be conserved as open space/preserve land.

4.4.4.1 Methodology

Biological resource impacts can be considered direct, indirect, or cumulative. They are also either permanent or temporary in nature.

Direct: Occur when biological resources are altered, disturbed, or destroyed during project implementation. Examples include clearance of vegetation, encroachment into wetland buffers (not applicable on this project), diversion of surface water flows, and the loss of individual species and/or their habitats.

Indirect: Occur when project-related activities affect biological resources in a manner that is not direct. Examples include elevated noise and dust levels, increased human activity, decreased water quality, changes to hydrological conditions not resulting in type conversion of vegetation community, and the introduction of invasive wildlife (domestic cats and dogs) and plants.

Cumulative: Occur when biological resources are either directly or indirectly affected to a minor extent as a result of a specific project, but the project-related impacts are part of a larger pattern of

similar minor impacts. The overall result of these multiple minor impacts from separate projects is considered a cumulative impact on biological resources.

Temporary: Temporary impacts can be direct or indirect and are considered reversible. Examples include the removal of vegetation from areas that will be revegetated, elevated noise levels, and increased levels of dust.

Permanent: Permanent impacts can be direct or indirect and are not considered reversible. Examples include removing vegetation from areas that will have permanent structures placed on them or landscaping an area with non-native plant species.

All potential project-related impacts (direct, indirect, and cumulative) were evaluated as a part of this assessment. The project would have primarily three classes of impacts: (1) permanent direct impacts on vegetation communities, sensitive plants species, and habitat for sensitive animals; (2) indirect temporary effects on certain sensitive natural communities, sensitive animals, or sensitive plant species from construction-related activities such as dust deposition, increased human presence, and noise associated with construction equipment; and (3) indirect permanent effects resulting from operation of the regional park system, such as an increased public presence that may indirectly affect animal movement or behaviors. Table 4.4-2 summarizes the types of impacts associated with this project.

Table 4.4-2. Summary of Project Components and Associated Impacts

General Location	Project Component	Impact Type	Sum of Acres
County Park and Trails	Active Park	Permanent	22.2
	Leach Field	Permanent	0.4
	New Fire Fuel Modification Zones	Permanent	0.5
Total Permanent Impacts			23.1
Open Space/Preserve	Native Habitat Avoidance Area	Temporary Indirect	2.1
	Pipe leading to leach field	Temporary Direct	< 0.1
	All other areas	Resource Management/ Habitat Enhancement Activities Only	65.4
Total Preserved			67.5
Existing Trails to Be Maintained		Impact Neutral	1.0
Existing Fuel Reduction Areas (not a part of project)		N/A	2.6
Grand Total			94.2

4.4.4.2 Thresholds of Significance

Appendix G of the CEQA Guidelines

The following significance criteria, based on Appendix G of the CEQA Guidelines, provide the basis for determining the significance of impacts associated with biological resources resulting from the implementation of the project. The determination of whether a biological resource impact would be significant is based on the professional judgment of the County DPR as Lead Agency, supported by

the recommendations of qualified personnel at ICF, and substantial evidence in the administrative record.

Impacts are considered significant if the project would result in any of the following:

- Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations or by CDFW or U.S. Fish and Wildlife Service (USFWS).
- Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by CDFW or USFWS.
- Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marshes, vernal pools, coastal areas, etc.) through direct removal, filling, hydrological interruption, or other means.
- Interfere substantially with the movement of any native resident or migratory fish or wildlife species, or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.
- Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.
- Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state Habitat Conservation Plan.

County of San Diego Guidelines for Determining Significance

According to the County Guidelines for Determining Significance, any of the following conditions would be considered significant (County of San Diego 2010b):

- 3.A. The project would impact one or more individuals of a species listed as federally or state endangered or threatened.
- 3.B. The project would impact an on-site population of a County List A or B plant species, or a County Group I animal species, or a species listed as a state Species of Special Concern.
- 3.C. The project would impact the local long-term survival of a County List C or D plant species or a County Group II animal species.
- 3.D. The project may impact arroyo toad aestivation, foraging, or breeding habitat.
- 3.E. The project would impact golden eagle habitat.
- 3.F. The project would result in a loss of functional foraging habitat for raptors.
- 3.G. The project would impact the viability of a core wildlife area, defined as a large block of habitat that supports a viable population of a sensitive wildlife species or an area that supports multiple wildlife species.
- 3.H. The project would cause indirect impacts to levels that would likely harm sensitive species over the long term.
- 3.I. The project would impact occupied burrowing owl habitat.
- 3.J. The project would impact occupied coastal cactus wren habitat.
- 3.K. The project would impact occupied Hermes copper habitat.

- 3.L. The project would impact nesting success of sensitive animals (as listed in the Guidelines for Determining Significance) through grading, clearing, fire fuel modification, and/or noise generating activities such as construction.
- 4.A. Project-related grading, clearing, construction or other activities would temporarily or permanently remove sensitive native or naturalized habitat on or off the project site.
- 4.B. Any of the following will occur to or within jurisdictional wetlands and/or riparian habitats as defined by USACE, CDFW and the County of San Diego: removal of vegetation; grading; obstruction or diversion of water flow; adverse change in velocity, siltation, volume of flow, or runoff rate; placement of fill; placement of structures; construction of a road crossing; placement of culverts or other underground piping; any disturbance of the substratum; and/or any activity that may cause an adverse change in native species composition, diversity and abundance.
- 4.C. The project would draw down the groundwater table to the detriment of groundwater-dependent habitat, typically a drop of 3 feet or more from historical low groundwater levels.
- 4.D. The project would cause indirect impacts to levels that would likely harm sensitive habitats over the long term.
- 4.E. The project does not include a wetland buffer adequate to protect the functions and values of existing wetlands.
- 5.A. Any of the following will occur to or within jurisdictional wetlands as defined by USACE: removal of vegetation; grading; obstruction or diversion of water flow; adverse change in velocity, siltation, volume of flow, or runoff rate; placement of fill; placement of structures; construction of a road crossing; placement of culverts or other underground piping; any disturbance of the substratum; and/or any activity that may cause an adverse change in native species composition, diversity and abundance.
- 5.B. The project would draw down the groundwater table to the detriment of groundwater-dependent federal wetlands, typically a drop of 3 feet or more from historical low groundwater levels.
- 5.C. The project does not include a wetland buffer adequate to protect the functions and values of existing wetlands.
- 6.A. The project would prevent wildlife access to foraging habitat, breeding habitat, water sources, or other areas necessary for their reproduction.
- 6.B. The project would substantially interfere with connectivity between blocks of habitat or would potentially block or substantially interfere with a local or regional wildlife corridor or linkage.
- 6.C. The project would create artificial wildlife corridors that do not follow natural movement patterns.
- 6.D. The project would increase noise and/or nighttime lighting in a wildlife corridor or linkage to levels proven to affect the behavior of the animals identified in a site-specific analysis of wildlife movement.

- 6.E. The project does not maintain an adequate width for an existing wildlife corridor or linkage and/or would further constrain an already narrow corridor through activities such as (but not limited to) reduction of corridor width, removal of available vegetative cover, placement of incompatible uses adjacent to it, and placement of barriers in the movement path.
- 6.F. The project does not maintain adequate visual continuity (i.e., long lines-of-site) within wildlife corridors or linkage.
- 7.A. For lands outside of the MSCP, the project would impact coastal sage scrub vegetation in excess of the County's 5 percent habitat loss threshold as defined by the Southern California Coastal Sage Scrub Natural Community Conservation Planning (NCCP) Guidelines.
- 7.B. The project would preclude or prevent the preparation of the subregional NCCP. For example, the project proposes development within areas that have been identified by the County or resource agencies as critical to future habitat preserves.
- 7.C. The project will impact any amount of sensitive habitat lands as outlined in the Resource Protection Ordinance (RPO).
- 7.D. The project would not minimize and/or mitigate coastal sage scrub habitat loss in accordance with Section 4.3 of the NCCP Guidelines.
- 7.E. The project does not conform to the goals and requirements as outlined in any applicable Habitat Conservation Plan (HCP), Habitat Management Plan (HMP), Special Area Management Plan (SAMP), Watershed Plan, or similar regional planning effort.
- 7.F. For lands within the MSCP, the project would not minimize impacts to BRCAs, as defined in the BMO.
- 7.G. The project would preclude connectivity between areas of high habitat values, as defined by the Southern California Coastal Sage Scrub NCCP Guidelines.
- 7.H. The project does not maintain existing movement corridors and/or habitat linkages as defined by the BMO.
- 7.I. The project does not avoid impacts to MSCP narrow endemic species and would impact core populations of narrow endemics.
- 7.J. The project would reduce the likelihood of survival and recovery of listed species in the wild.
- 7.K. The project would result in the killing of migratory birds or destruction of active migratory bird nests and/or eggs (Migratory Bird Treaty Act).
- 7.L. The project would result in the take of eagles, eagle eggs or any part of an eagle (Bald and Golden Eagle Protection Act).

4.4.4.3 Project Impacts and Mitigation Measures

Threshold 1: The project would have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.

County Park and Trails

Impact Discussion

Construction

Construction of the active park would require grading equipment for site preparation as well as standard construction equipment, such as earthmoving equipment, tractors, excavators, backhoes, a water truck, drill rig, bobcat, forklift, rollers, a rubber tire loader, wheel tractor scrapers, an air compressor, a generator set, crane, and concrete truck. Construction would result in temporary direct and indirect impacts on the area due to an increase in noise levels, truck traffic, and ground-disturbing activities. Construction would have direct permanent impacts through the removal of native vegetation and habitat with construction of the active park.

Impacts on 22.4 acres of native habitats (see Table 4.3-4, below, under Threshold 2) are anticipated from construction of the proposed park. The impacts represent approximately 4.9 percent of the total available open space and conserved lands within the immediate vicinity of the County's parcel. These existing open space and conserved lands include 1) the Wright's Field Preserve; 2) contiguous privately held open space lands, including some with conservation easements; and 3) the proposed preserve lands within the remainder of the County's parcel.

Special-Status Plant Species

Of the eight sensitive plant species found within the BSA, two would be permanently and directly affected by implementation of the project: decumbent goldenbush and Palmer's grappling hook. Decumbent goldenbush would be directly affected at one location in the north-central portion of the active park, within an area that supports approximately 110 individuals covering approximately 3,500 square feet. This represents approximately half of the individuals observed on-site; these individuals are located at the far eastern range for this taxon. Decumbent goldenbush is a County List A species and therefore ~~As a result, the project would have the potential to contribute to the regional long-term decline of this species, and~~ the impacts would be significant (**Impact-BIO-1**).

Approximately 13,857 Palmer's grapplinghook individuals were observed during special-status plant surveys in 2019. Of the 13,857 individuals, 200 would be affected by the construction of the active park, representing approximately 1 percent of the on-site population of this County List D species. Individuals would be removed during grading and site preparation for the project. Because of the low number of individuals affected, as well as the relatively large number of individuals in the entirety of the BSA, impacts would not result in a regional decline in the species and therefore would be less than significant. Chocolate lily, delicate clarkia, small-flowered microseris, and Southern California black walnut were all observed within the BSA. These species are not expected to be

directly affected by ~~implementation-construction~~ of the project. Because of the widespread nature of Palmer's grapplinghook~~this species~~, as well as the relatively low number of individuals that would be directly removed by the project, these impacts would be less than significant.

The County redesigned the project's equestrian staging area to avoid impacts on Engelmann oaks. Areas identified as a "Native Habitat Avoidance Area" would not be subject to grading or vegetation removal during site preparation activities (see Figure 4.4-6). As a result, no Engelmann oak individuals or their associated canopies would be within the proposed grading limits of the project, and no direct temporary or direct permanent impacts on Engelmann oaks would occur with construction. Grading and site development would occur entirely outside of the canopy dripline of all Engelmann oaks.

The County is proposing grading and site development within 0.94 acre of land within a 50-foot root protection zone¹ where Engelmann oak root zones are located. Activities within the root protection zone would include grading/site preparation (e.g., compaction) and construction of park infrastructure (Figure 4.4-6). These activities would occur within the root protection zone of approximately 25 Engelmann oak trees, including one individual that was noted by the County's arborist in 2020 to be in very poor health and/or dying. Although grading activities would occur within the root protection zone, as mentioned above, none of those activities would occur directly under the canopy of any Engelmann oaks, and no Engelmann oaks would be removed as a result of construction activities associated with the project. However, activities within the root protection zone have the potential to result in indirect impacts and decline in these 25 Engelmann oaks over time. Although indirect impacts during construction would be temporary, it is possible that, within the root protection zone, they could cause damage to the oaks that would not be visible during or even immediately after construction activities occur. This damage could cause a permanent decline in these oaks, resulting in mortality. In addition, fire fuel modification activities would occur within approximately 0.1 acre of Engelmann oak woodland. Approximately seven Engelmann oak tree canopies are within the area where fire fuel management would occur. Four of these oaks are in the Zone B fire fuel reduction zone where canopy thinning of some oaks may be required, in coordination with a certified arborist. The other three oaks are directly west of South Grade Road, in the 20-foot area where fire fuel management would be extended from the existing fire fuel management area along South Grade Road. Impacts within the root protection zone could potentially be significant, absent mitigation (**Impact-BIO-2**).

Short-term indirect impacts could occur on decumbent goldenbush, Palmer's grapplinghook, and Engelmann oak during construction activities because each of these sensitive species would occur within 200 feet of the active park. Construction-related indirect impacts could include dust deposition that could alter the photosynthetic vigor of these individual plants and the potential spread of invasive species into the open space preserve from the construction area. These short-term indirect impacts could become permanent if invasive species become established and are not eradicated. Potential erosion of the soil around these special-status plants also could occur from stormwater runoff associated with construction (grading) activities. Dust control measures would be required for this project (see Section 4.3, *Air Quality*), as would stormwater pollution prevention best management practices (BMPs). These would reduce impacts from dust and erosion. As part of the County's long-term management of the preserve, invasive species and noxious weeds would be

¹ Root protection zones are defined in Section 3.5.5 of the County's Report Format and Content Requirements document as 50 feet "outward from the outside edge of the oak canopy" (County of San Diego 2010a).

managed abated. As a result, these indirect impacts on special-status plants are not expected to result in a long-term decline of any of these species and would be less than significant.

~~All [RD1] special-status species present in the BSA, with the possible exception of Southern California black walnut, have the potential to be trampled from unauthorized users within the proposed Alpine Preserve, which could result in plant decline or mortality. Unauthorized off trail activities (e.g., off-trail trampling, building of jumps/berms within the trails) also could occur. These activities also could result in the decline or mortality of special-status plants. However, the public is currently walking and, at times, parking on the County's property as well as engaging in unauthorized off trail activities (e.g., off-trail trampling, building of jumps/berms within the trails). These impacts are not expected to be appreciably greater after construction of the proposed park. Moreover, the County has proposed additional signage, a live-in volunteer and park rangers to monitor the Alpine Preserve and Alpine Park, as well as a formalized staging area for parking, which would minimize impacts on these special-status species from unauthorized activities (e.g., off trail trampling, building of jumps/berms within the trails, parking in unauthorized areas). After implementation of the proposed project, it is anticipated that fewer long-term impacts on special-status plants would occur compared to baseline conditions.~~

Special-Status Wildlife Species

The following special-status wildlife species were observed within the BSA during surveys and are included in the impact analysis for the project (see below): QCB, Belding's orange-throated whiptail, Blainville's (coast) horned lizard, coastal western whiptail, red-diamond rattlesnake, western spadefoot, burrowing owl (wintering migrant), Cooper's hawk, red-shouldered hawk, western bluebird, big free-tailed bat, pallid bat, pocketed free-tailed bat, Townsend's big-eared bat, western long-eared myotis, western mastiff bat, western red bat, western small-footed myotis, western yellow bat, and Yuma myotis. In addition, the following special-status species, which were determined to have moderate or high potential to occur within the BSA, are also included in the impact analysis below: Baja California coachwhip, California glossy snake, coast patch-nosed snake, Coronado skink, Southern California legless lizard, Bell's sage sparrow, burrowing owl (breeding occurrence), ferruginous hawk, grasshopper sparrow, Lawrence's goldfinch, Oregon vesper sparrow, Southern California rufous-crowned sparrow, white-tailed kite, Northwestern San Diego pocket mouse, San Diego black-tailed jackrabbit, and Bryant's (San Diego desert) woodrat.

Invertebrates

The project is not within a recovery area or designated critical habitat for QCB (USFWS 2003). The project would result in impacts on two of seven locations (29 percent) where QCB adults were observed in the past on the project site or in Wright's Field, including an observation made in 2010, as documented in the USFWS Carlsbad Fish and Wildlife Office data (2019) and during surveys in 2019 and 2020 (**Impact-BIO-3**). Both locations would be affected by construction of Alpine Park. No locations would be affected by maintenance of the existing trails. Five locations (71 percent) where QCB adults were observed in the past would be permanently protected within either the Wright's Field Preserve or the proposed open space/preserve.

Incidental take of QCB could occur in the form of harassment, harm, injury, or mortality during construction. Direct impacts that could result in incidental take of QCB would occur through the permanent removal of 22.4 acres of occupied habitat. Direct impacts on QCB adult locations and host plants (e.g., dot-seed plantain [*Plantago erecta*]) are shown in Figure 4.4-3. Because of the configuration of the proposed park, which would have a straight western extent and an eastern edge

defined by South Grade Road, it is not anticipated that QCB would experience additional edge effects compared to baseline conditions. The BSA currently experiences edge effects along South Grade Road, an area where the highest concentration of invasive species was observed and where fuel modification activities are currently conducted within approximately 30 feet of the edge of South Grade Road. After park construction, the edge effects would be moved to the western edge of the park and similar in severity on QCB to baseline conditions.

Indirect impacts on QCB also would occur because of the project. The loss of native forbs that provide QCB with nectar would occur within the 22.4 acres of occupied QCB habitat where the active park would be constructed. The loss of these nectar plants would reduce the carrying capacity of the site to support QCB in perpetuity. During construction, QCB also may avoid habitat along the western edge of the proposed active park because of an increased presence of noise, dust deposition on plants adjacent to the construction areas, and human presence. Indirect effects associated with noise and fugitive dust are not expected to be significant after completion of grading and construction activities.

HCB was not observed within the project site during comprehensive surveys in 2019 and 2020. In addition, HCB has not been documented on the County's property in publicly available databases, such as San Diego Association of Governments (SANDAG) (2011) and CNDDDB (2020). Occurrences nearby have been documented at the northern portion of Wright's Field, in an area where spiny redberry is much more abundant than on the County's property, and on a privately held parcel south of Wright's Field. There are approximately 68 spiny redberry within the County's parcel, representing approximately 4 percent of the 1,679 spiny redberry individuals mapped during the HCB surveys on both the County's parcel and Wright's Field. Furthermore, no impacts on spiny redberry would occur from construction of the proposed Alpine Park, activities in the new fire fuel reduction areas, or the associated maintenance of existing trails. As a result, no impacts on HCB individuals are anticipated.

Although development of the active park would result in project activities (i.e., construction of the active park, potential installation of the septic system, and maintenance of the trails) occurring on 20.3 acres of designated critical habitat for HCB, only 4 acres contain the physical and biological features critical to conservation of the species, such as areas with flat-topped buckwheat, including disturbed flat-topped buckwheat. The County's Guidelines for Determining Significance (2010b) considers impacts on occupied HCB habitat to be significant. Because the site is currently unoccupied by HCB, impacts on critical habitat for the species would be less than significant. The USFWS would consider impacts on HCB critical habitat resulting from the project as part of its review of the Habitat Conservation Plan the County is preparing to address impacts on QCB.

Amphibians

Western spadefoot may also be affected by the project. One breeding pool of approximately 157 square feet (AP-7) was documented within the active park development footprint. This breeding pool may be utilized by western spadefoot when seeking to expand from the core population in Wright's Field Preserve during exceptionally wet years, such as 2019 when an egg mass was observed in AP-7. AP-7 will be filled in during construction of the active park (**Impact-BIO-4**). Impacts on this potential breeding pool would be significant absent mitigation.

As described in the Western Spadefoot Survey Report (Appendix D), the core breeding population of western spadefoot is located within seasonally inundated basins in Wright's Field Preserve. A recent study (Baumberger et al. 2019) that documented the distances from breeding pools to burrow locations led to a determination that burrows and estivating adults could be expected to occur

within approximately 262 meters of the known breeding pools in Wright's Field Preserve. The area within this 262-meter distance includes the western portion of the BSA but not areas within the proposed active park where grading would occur (see Figure 4.4-4). As a result, it is not anticipated that western spadefoot individuals would burrow/estivate within the proposed development footprint for the active park; therefore, it is unlikely that individuals would be crushed or killed during construction activities such as grading.

Adult western spadefoot also emerge a few nights per year to forage and breed (San Diego Management and Monitoring Program 2022). These activities are most likely to occur within the same general area as burrowing habitat, although the presence of eggs within basin AP-7 during 2019 demonstrates that they can migrate farther east and into the area proposed for park development during these nocturnal breeding events but only during particularly wet years. Because these foraging and breeding events happen in the evening when construction equipment would not be active, it is unlikely that direct impacts on western spadefoot, such as crushing or illegal collecting, would occur during foraging and breeding events.

Reptiles

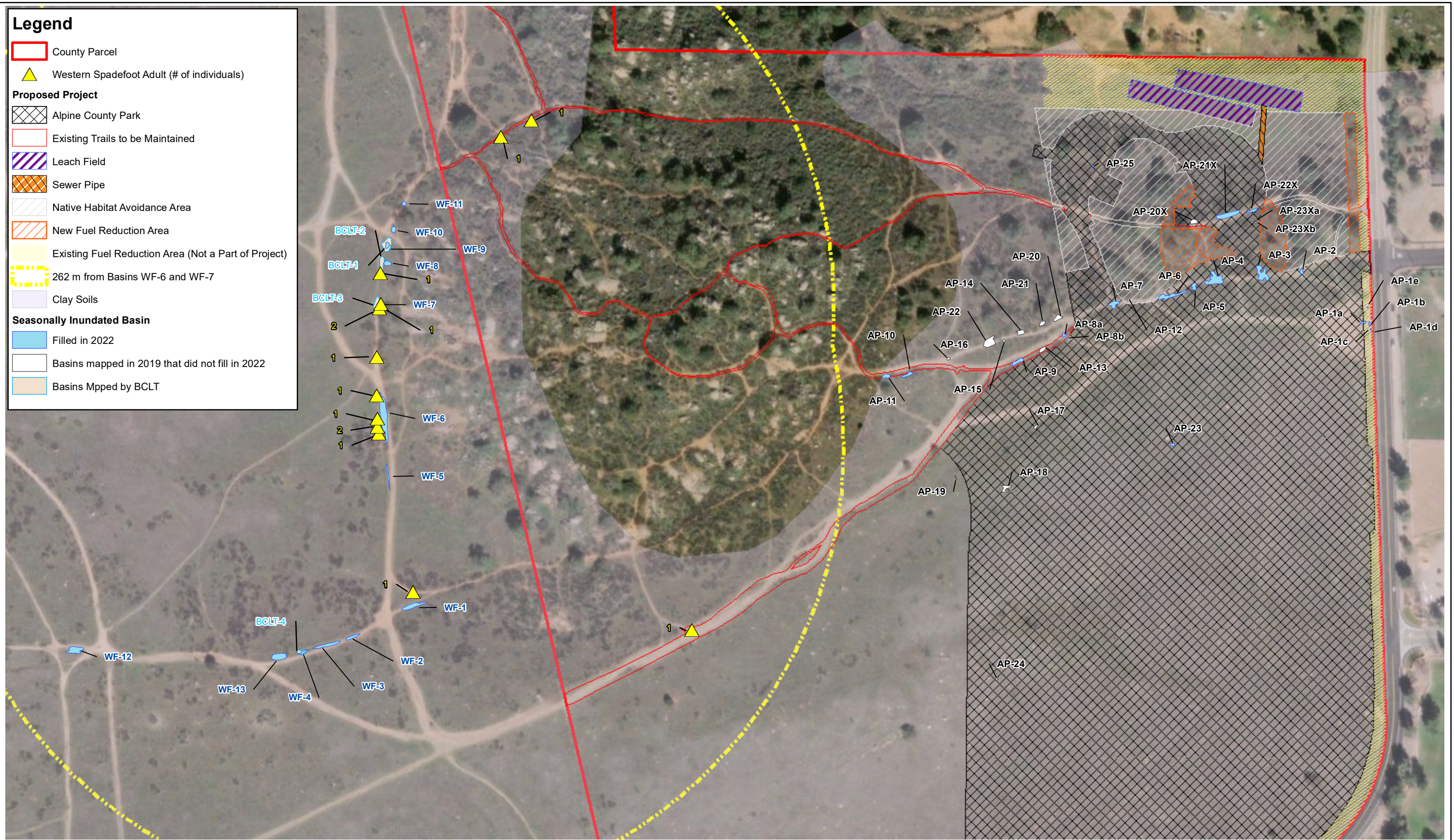
Orange-throated whiptail, coast horned lizard, coastal western whiptail, and red-diamond rattlesnake were observed within the BSA. Baja California coachwhip, California glossy snake, coast patch-nosed snake, Coronado skink, and Southern California legless lizard were not observed but could occur within the project site. These nine species would be directly and indirectly affected through implementation of the active park during construction (**Impact-BIO-5**). Direct impacts include the conversion of all native and naturalized habitats within the proposed active park footprint that could support these species. Direct impacts could occur during construction of the active park if individuals are in the construction footprint.

Indirect impacts on these species could occur during construction of the project. Indirect temporary impacts during construction include increased dust from grading and construction, increased noise from construction crews and equipment, and increased foot traffic during construction. However, dust control measures would be required for this project (see Section 4.3) and would reduce these impacts to less-than-significant levels.

Birds

Construction of the active park would have permanent direct and indirect impacts on avian species that are endemic to the region, including special-status avian species. A wintering burrowing owl was observed incidentally during surveys in 2019. Cooper's hawk, a California Species of Special Concern; red-shouldered hawk, a County Group I species; and western bluebird, a County Group II species, were observed in the BSA during protocol surveys in 2019 and 2020 and are expected to be affected by the project. Bells' sage sparrow, burrowing owl (breeding occurrence), ferruginous hawk, grasshopper sparrow, Lawrence's goldfinch, Oregon vesper sparrow, Southern California rufous-crowned sparrow, and white-tailed kite have either moderate or high potential to occur (either breeding or foraging, or both) within the BSA.

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Source: Esri, DigitalGlobe (2018)



0 150 300
1:2,099 Feet

Figure 4.4-4
Western Spadefoot
Alpine Park Project

Table 4.4-3 summarizes the proposed impacts on habitat for special-status avian species and raptors, grouped by habitat requirements. These impacts are presented in the context of the regionally available habitat for these species groups in the adjacent Wright's Field Preserve and within privately held, directly contiguous open space lands in the immediate vicinity of the proposed project. This analysis shows that the 18 acres of impacts on grassland habitat from the proposed project reflect approximately 14 percent of the available grassland habitat in the immediate habitat block west, north, and south of the project site. By comparison, only 2 percent of the available scrub habitat in the immediate vicinity would be affected by the proposed project. Impacts on habitat for all special-status avian species, most of which are either California Species of Special Concern or Group I species, would be significant, absent mitigation (**Impact-BIO-6**).

Table 4.4-3. Avian Species Impacts and Availability of Habitat in Immediate Vicinity

Avian Species Group	Species Included in Group	Permanent Direct Impacts on Habitat	Available Open Space/ Preserve Land		Percent Impact Compared to All Available Open Space/Preserve Land ^b
			Habitat in Alpine Preserve (acres)	Habitat in Immediate Vicinity ^a	
Generalist Avian Species	Cooper's hawk, red-shouldered hawk, white-tailed kite, raptors	22.4	67.2	379.6	5%
Grassland Obligates/ Open Habitat	Burrowing owl (wintering and breeding), grasshopper sparrow, Oregon vesper sparrow, ferruginous hawk	18.4	15.4	113.4	14%
Scrub Habitat Specialists	Bell's sage sparrow, Southern California rufous-crowned sparrow	4.0	44.7	127.8	2%
Woodland Specialists	Lawrence's goldfinch, western bluebird	0.1 (No direct removal of Engelmann oaks)	6.6	135.5	0.1%

^a. Includes areas within Wright's Field Preserve as well as privately held open spaces, some of which are permanently conserved through conservation easements. Source: SANDAG Conserved Lands GIS data; SANDAG 2012 Vegetation Data for Western San Diego County GIS data.

^b. Vegetation data for this analysis included the site-specific vegetation mapping conducted for the proposed project in the BSA and SANDAG 2012 Vegetation Data for Western San Diego County GIS data for all areas outside the BSA. Vegetation data outside of the BSA is not as precise as field-verified vegetation data, but for the general habitat types (i.e., grassland, shrubland, etc.) required in this analysis, the SANDAG vegetation data is sufficiently accurate to estimate the relative extent of impacts from the proposed project.

Direct mortality of nesting avian species, including both common species protected under the MBTA and special-status avian species, also could occur during construction. Direct mortality could occur if eggs, chicks, or adults are crushed or destroyed by construction equipment or if nests are abandoned because of an increase in noise and human presence during construction. This impact (**Impact-BIO-7**) would be significant.

Although the burrowing owl that was observed was a transient winter migrant and breeding season surveys were negative, burrowing owl could still occur within the BSA and possibly within the areas proposed for grading for the active park. Ground squirrel burrows exist throughout the BSA; if breeding burrowing owls are present during construction activities, direct mortality of this species, including eggs or chicks, could occur. Impacts on breeding burrowing owl would be significant absent mitigation (**Impact-BIO-8**).

Implementation of the project would also result in the loss of approximately 22.4 acres of functional foraging habitat for raptors. Valley needle grassland and non-native grassland both serve as prime foraging habitat for raptors, as do the open scrub habitats on the site. The project footprint would affect these types of habitats, resulting in a loss of functional foraging habitat for raptors. Impacts on functional foraging habitat for raptors would be significant, absent mitigation (**Impact-BIO-9**).

Temporary direct impacts would occur during construction of the project. Expected impacts include increased dust from grading and construction, increased noise from construction crews and equipment, increased foot traffic during construction, and increased noise from crews and equipment. This may temporarily alter the natural behaviors of avian species in the area. However, dust control measures would be required for this project and would reduce impacts to less-than-significant levels.

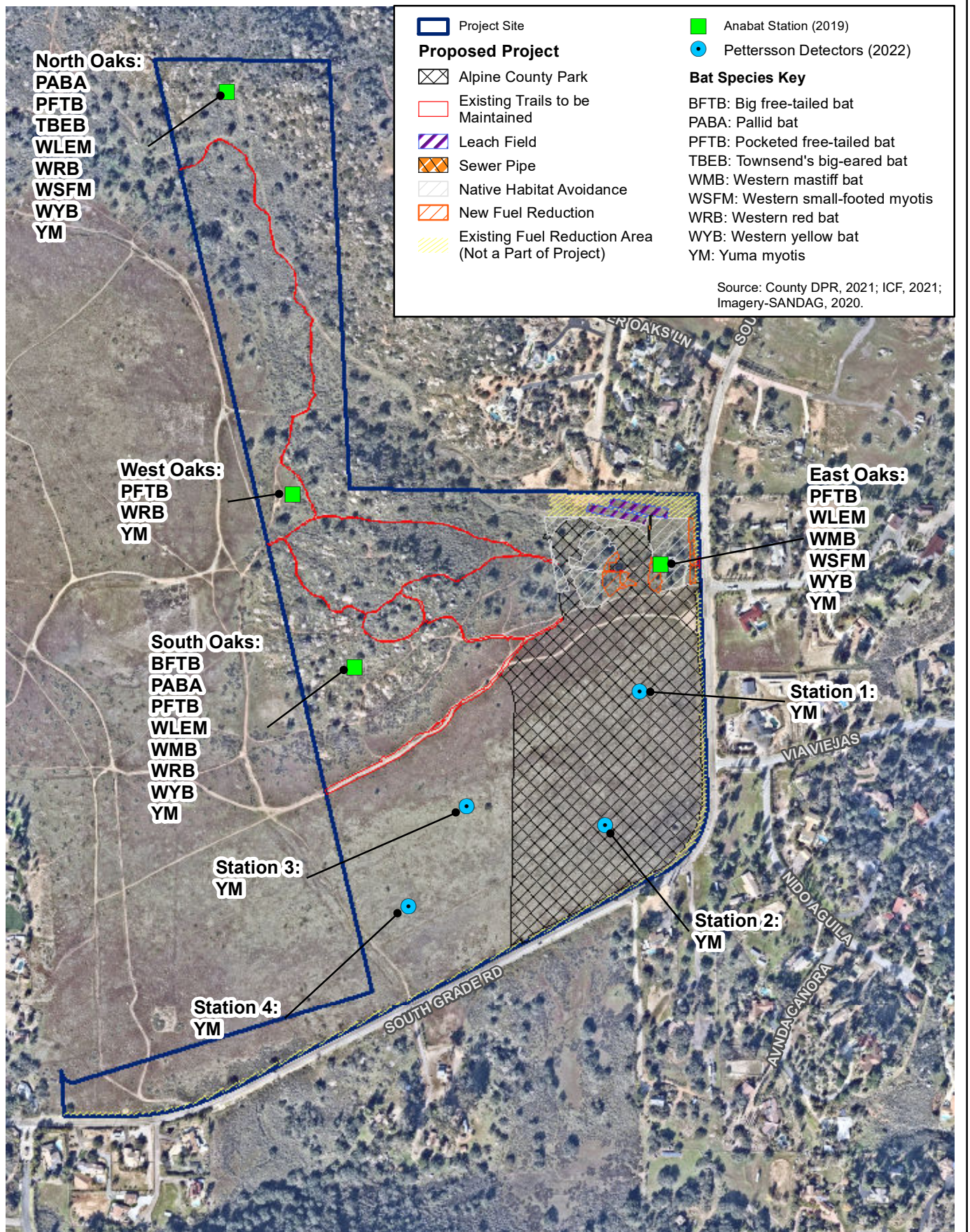
Mammals

Special-Status Bats

Fifteen of the 22 known bat species in San Diego County were detected on the property, 10 of which are considered special-status species. Seven are listed as California Species of Special Concern: pallid bat, Townsend's big-eared bat, western red bat, western yellow bat, western mastiff bat, pocketed free-tailed bat, and big free-tailed bat (Figure 4.4-5). Three County Group II bat species were also observed in the BSA: western long-eared myotis, western small-footed myotis, and Yuma myotis. Permanent direct and temporary indirect impacts on these species would be expected to occur from construction activities that permanently remove habitat for these species. These bat species were observed foraging over most of the native habitats in the BSA, especially within the open Engelmann oak woodland, flat-topped buckwheat, and native and non-native grasslands within the project footprint. Direct impacts on up to 22.4 acres of native habitats would remove foraging and possibly roosting habitat for these bat species during vegetation clearing associated with construction of Alpine Park (**Impact-BIO-10**).

As mentioned above, impacts on pallid bat foraging habitat would be significant. This species is particularly vulnerable to impacts associated with the proposed project because of the rarity of known roost sites in San Diego County (there are only two known pallid bat colony sites) (Stokes 2018). The individual pallid bats observed during focused bat surveys may belong to a maternal colony that roosts in Viejas at a private residence or in a yet-unknown location. Pallid bat also has a very specific foraging strategy; it utilizes grasslands and open oak woodlands as its main foraging habitat. In addition, this species has characteristics that affect its success with increased urbanization. This includes its tendency to fly at low altitude, its inability to fly for prolonged distances, and its specialized foraging strategies.

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0 250 500
Feet
1 in = 547 ft

**Figure 4.4-5
Special-Status Bats
Alpine Park Project**

Implementation of the project would not affect any known roosting habitat or maternal colony sites; however, roost sites for some of these species are very difficult to detect. There may be some potential for bats, such as pallid bat, to use rock outcrops as roost sites. Pallid bats also may roost in very small crevices within rocks. Rock outcrops that pallid bats may use for roosting were observed west of proposed construction areas, which is close enough for roosting females to potentially experience distress during critical developmental periods, such as when they are pregnant or caring for young. Western red bats may also roost within the foliage of the Engelmann oaks on the site, making them very difficult to detect visually. Bat biologists often require telemetry tracking to positively identify western red bat.

No large rock outcrops or trees would be removed as part of construction of the project. However, construction activities may occur directly adjacent to Engelmann oaks and within approximately 200 feet of rock outcrops. Bat species are particularly vulnerable to impacts on maternal roost sites, such as within oaks or rock crevices. Although direct removal of trees or large boulders is not proposed as part of construction for the active park, high-pitched frequencies (e.g., from surveying equipment) could harm maternal roost sites, resulting in roost abandonment or thermal shock. These impacts could cause direct mortality of pregnant females or pups. The impacts would be significant under the County's guidelines (County of San Diego 2010b), absent mitigation (**Impact-BIO-11**).

Indirect impacts on bat species, such as disruption of foraging behavior, could occur if construction takes place during evening hours. Because bats are nocturnal species and construction is expected to occur during daytime hours, indirect impacts on these species due to construction activities would be minimal and would not be expected to alter natural behaviors. Maintenance of existing trails near or within oak woodlands is not expected to alter the quality of foraging habitat or affect roosting habitat for these species because the trails occur within already-disturbed areas of bare ground.

Other Special-Status Mammals

The northwestern San Diego pocket mouse, San Diego black-tailed jackrabbit, and Bryant's (San Diego desert) woodrat were determined to have moderate potential to occur within the BSA and be affected by implementation of the project. Suitable habitat for all three species can be found in the Valley needlegrass grasslands, non-native grasslands, and open flat-topped buckwheat scrub habitats within the BSA as well as the construction footprint of Alpine Park. Grasslands and flat-topped buckwheat within the construction footprint would be directly affected and converted to a developed park, removing it as habitat that could support the species (**Impact-BIO-12**). Temporary direct and indirect impacts on the species are expected to occur during and post-construction of the project. Temporary direct impacts on these species include possible accidental take due to construction activities, increased dust from grading and construction, increased foot traffic during construction, and increased noise pollution from crews and equipment. Natural behaviors of these species would be affected. However, dust control measures would be required for this project and would reduce these impacts to less-than-significant levels.

Because these species are active mostly at night (Tremor et al. 2017), foraging habits are not expected to be significantly affected, but construction activities may cause them to be active during the day to avoid construction activities. The San Diego pocket mouse is known to utilize burrows for shelter. Because this species is less active during the day, the time when construction would be most active, direct impacts on this species, including the potential for direct mortality through crushing, is possible because San Diego pocket mouse individuals might be resting in burrows.

Operation

Operation of Alpine Park includes maintenance of the park and existing trail system, fire fuel management activities (i.e., vegetation trimming and clearing), as well as ongoing usage of the park and trails by the public. The equestrian staging area would contain receptacles for waste and equestrian manure; a Manure Management Plan would be prepared for the project to control disease vectors and pests, such as mosquitoes and other animals/insects that are vectors for disease or impacts on human health. The County has proposed additional signage and a live-in volunteer and park rangers to monitor the Alpine Preserve and Alpine Park. As such, it is anticipated that fewer long-term impacts on special-status plants and animals would occur after implementation of the proposed project compared to baseline conditions. The sections below provide additional details on this conclusion.

Impacts on Wright's Field

Operation of Alpine Park and its associated trails has the potential to increase usage on trails within the adjacent Wright's Field Preserve. This increased usage would have the potential to increase impacts on special-status plants and wildlife, consistent with the impacts described below. However, the proposed Alpine Park would be approximately 600 to 800 feet away from the eastern edge of Wright's Field. At that distance, impacts from operation of the active park and formalization of the trails would dissipate considerably and be considered less than significant. Night lighting would not be used during operation of the park; therefore, impacts on nocturnal animals are not anticipated. Impacts on the Wright's Field trail system from the presence of the active park are not expected to dramatically change the nature or intensity of trail usage at Wright's Field because of both the distance from the park to Wright's Field and the different usage preferences. Users who come to the active park for ball sports or skateboarding are not anticipated to also be hiking the distances required to access Wright's Field regularly. In addition, Wright's Field is accessed from its own entrance on the far western edge of its boundary.

Although some increase in trail usage can be expected from the easier parking within the proposed park, users can currently park along South Grade Road to access trails within the County's parcel and do so regularly. Usage of the trails in Wright's Field is anticipated to be driven by changing conditions in the larger community, including population growth and the availability of other open space areas, even public health hazards such as the coronavirus pandemic, which increased park usage throughout San Diego County. As a result, operation of Alpine Park is not anticipated to result in significant impacts on special-status plants or animals in the adjacent Wright's Field Preserve.

Special-Status Plant Species

Trail maintenance is not expected to have direct permanent or temporary impacts on any special-status species or their habitats. Park rangers will ensure that trail maintenance is consistent with the Preserve's RMP and does not impact populations of rare plants.

Maintenance of the park site would be completed within the perimeter fence that would be constructed around the park; therefore, there would be ~~minimal~~ no effects from park maintenance on special-status plants because none would occur within the active park site once construction is complete.

All special-status species present in the BSA have the potential to be trampled from unauthorized, off-trail users within the proposed Alpine Preserve, which could result in plant decline or mortality. Unauthorized off-trail activities observed in the BSA have included off-trail trampling, and building of bike jumps/berms. Implementation of the project would include additional signage to educate the

public and inform them of avoidance areas, and park rangers and a live-in volunteer to monitor the Alpine Preserve and Alpine Park. The presence of the active park has the potential to draw additional people onto the trails and open space/preserve areas. This potential increase in the number of people using the trails could result in direct impacts on special-status plants if park users go off-trail and sensitive such plants are trampled or crushed ~~from unauthorized off-trail activities.~~ This is ~~Off-trail trampling is a specially true concern~~ for low-growing annuals such as the two delicate clarkia individuals observed approximately 6 feet from the main east-west trails through the north-central portion of the open space/preserve, as well as the Palmer's grapplinghook near the east-west trail/vehicle access path through the south-central portion of the open space/preserve. Within 10 feet of this trail/vehicle access path, fewer than 100 individual Palmer's grapplinghook individuals were noted in 2019. These potential impacts on Palmer's grapplinghook would be less than significant because of the widespread nature of ~~both this County List D species~~ (San Diego Natural History Museum 2021). Impacts are not expected on the two delicate clarkia individuals during operation of the trail system because of the County's proposed management of the Alpine Preserve, within which these individuals will be located. Signage and fencing will be implemented in specific locations, in accordance with the RMP. Furthermore, it is unlikely that additional trail use would affect the Engelmann oaks and Southern California black walnut because of their size. Similarly, increased traffic on trails is not likely to jeopardize the long-term existence of the San Diego County viguiera because of the location of these individuals far north of the open space/preserve, an area that is not heavily traveled, as well as the widespread nature of this taxa (San Diego Natural History Museum 2021). ~~The County has proposed additional signage and a live-in volunteer to monitor the open space/preserve and trails, which would further minimize impacts on these special-status species from unauthorized trail activities. With implementation of management of the Alpine Preserve, the potential for impacts on special status plants from the operation of the Project would be less than significant.~~

Other potential long-term impacts resulting from operation of the active park and formalization of the existing trail system include an increase in invasive plant propagules being introduced into the open space/preserve. This, combined with the existing bare ground that exists along these trails, could create an environment that could support invasive species, creating more competition with the special-status species. Invasive plant management along the edges of the trails will be a management focus for the County during the long-term resource management associated with the open space/preserve. As a result, these activities would not present a significant impact on the regional long-term survival of special-status plants present on the site.

Impacts to Engelmann oaks could potentially occur during fire fuel reduction activities, as described above, but would occur in coordination with a certified arborist. No other special-status plants or host plants for QCB or HCB occur within these new fire fuel management zones.

Special-Status Wildlife Species

As mentioned above, operation of the active park includes maintenance of the park and existing trail system as well as the ongoing usage of the park and trails by the public. Maintenance of the trails and the park site would result in occasional noise and additional human presence along the trail and at the edge of the park adjacent to the open space/preserve. This noise could disrupt behavioral patterns of special-status wildlife adjacent to these activities, with varying degrees of intensity, based on the distance of the animal from the noise source and its ability to withstand noise and other anthropogenic disturbances. Noise impacts from maintenance activities would not result in direct mortality of individual special-status wildlife species and would not result in a regional

decline of these species. As such, these impacts would be less than significant. Furthermore, proper maintenance of the park, such as trash collection and disposal, would reduce impacts on special-status wildlife species in the open space/preserve by ensuring that litter would not blow into the open space/preserve and entice wildlife to ingest trash. This would also help control animal pest infestations that could disrupt special-status wildlife use of the proposed Alpine Preserve.

The following sections describe the potential impacts on special-status wildlife species from additional human usage of the trails and open space/preserve areas. Much of the discussion that follows reflects the latest research on the subject of “recreational ecology,” which is an interdisciplinary field that studies the ecological impacts of recreational activities and the management of these impacts (CDFW 2020).

Invertebrates

Post-construction, the existence of Alpine Park would increase the amount of anthropogenic influence in the areas along the existing trails. The existing trails currently support a few scattered dot-seed plantain individuals that may be trampled with increased use of the trails. These impacts are also included in total impacts on QCB host plants, described under *Construction*, above. Other indirect impacts may be similar to those described for the federally endangered Karner blue butterfly (*Lycaeides melissa samuelis*) (CDFW 2020). In that study, the Karner blue butterfly flushed in the presence of hikers, similar to how they might respond to natural predators. Recreational activities also restricted the choice of and access to host plants due to the presence of hikers, rendering the quality of the habitat within 33 feet of the trail unsuitable.

Within the 96.6-acre project site, approximately 3,450 host plants are located within 33 feet of existing trails that would be formalized as part of the project. QCB may be restricted from accessing these host plants, reducing the potential reproductive success of individuals. These indirect impacts from increased human presence along trails may cumulatively result in reduced use by QCB of habitat immediately surrounding the trails. QCB has persisted at the project site over time and is presumed to currently utilize areas adjacent to trails, especially in areas where host plants are located. The increase in human activity from formalization of the trails and creation of the Alpine Park is not expected to result in regional long-term decline of this species or additional direct take of individuals. The large stand of dot-seed plantain in the northern portion of the project site (see Figure 4.4-3) is directly adjacent to and surrounded to the east by closed-canopy scrub habitat that was determined during protocol-level surveys to not be suitable for QCB, in accordance with the definition of “excluded areas” in the 2014 USFWS survey guidelines. In the southern portion of the project area, dot-seed plantain was mapped within approximately 20 to 30 feet of the existing dirt road that leads to the Wright’s Field property. This road is being maintained for access to Wright’s Field; it is not anticipated that this road will see a major increase in either pedestrian or vehicular traffic from the proposed project. The other alternative for accessing Wright’s Field would be from the south, directly off South Grade Road. This access road is much more overgrown and supports a significantly larger population of dot-seed plantain. This is where ICF directly observed QCB in 2020. As a result, the proposed access road to Wright’s Field through the central portion of the County’s parcel reflects the least impactful option for permanent access to the Wright’s Field Preserve with respect to QCB. In addition, County DPR would restrict access to approximately 3,300 feet of existing trails throughout the open space/preserve, allowing those areas to naturally revegetate and stabilize. Dot-seed plantain has been documented on the project site colonizing old roads and trails; it appears to have a competitive advantage over annual grasses in these compacted soils. Annual grasses can outcompete dot-seed plantain in other areas; therefore, it is probable that the closed trails may support host plants in the future. As a result, it is not

anticipated that operational effects of the project would result in additional significant impacts on QCB, beyond those described for construction, above.

Reptiles and Amphibians

Post-construction, the existence of Alpine Park would increase the amount of anthropogenic influence in the areas immediately surrounding the park footprint. There is a possibility for increased foot traffic, mountain bike traffic, and horse traffic within the trail system that is proposed to be formalized as part of the project. These trails exist in habitat that could support special-status reptiles and amphibian species, such as the Belding's orange-throated whiptail, coast horned lizard, coastal western whiptail, and red-diamond rattlesnake, which were observed within the BSA, and other special-status reptile species that could occur within the BSA. With an increase in these activities, there is an increased risk of these species being crushed, especially from mountain bike activities. Bike-caused fatalities may occur because amphibians and reptiles may be attracted to trails for thermoregulation and thereby become vulnerable to collisions with bikes (CDFW 2020). An increased presence of humans also means an increased presence of domestic dogs, which may predate on these species. Dogs' scent can linger as well, long after a dog has left an area, which can repel special-status wildlife species (CDFW 2020). This is true for both leashed and unleashed dogs.

As mentioned above, the County has proposed additional signage and a live-in volunteer and park rangers to monitor the Alpine Preserve and Alpine Park as part of project implementation. Moreover, the public is currently accessing the County property for hiking and mountain biking, in some instances along trails that would be closed as part of the project. The presence of an active park adjacent to these trails is not anticipated to significantly increase mortality or reduce the viability of special-status reptiles or amphibians over the long-term because of the differences in user preferences between the two forms of recreation. There most likely would be an increase in the number of horses on the property compared to baseline condition due to the construction of an equestrian staging area. Horses move much slower than most reptile species, and as such, most reptiles would be adroit enough to avoid being crushed by hooves. However, these impacts would be significant absent mitigation because they could directly and permanently affect Group I wildlife species and/or California Species of Special Concern (**Impact-BIO-13**).

Western Spadefoot

During development of the proposed trails, the County worked closely with the Back Country Land Trust (BCLT) to determine which trails to close and which to keep open to the public. One of the factors in these decisions was the presence of known population of western spadefoot within seasonally inundated basins along roads/trails in the eastern portion of Wright's Field Preserve. An existing trail, currently located along a steep section of the "knoll" or central hill on the County's parcel, leads visitors directly into the area where western spadefoot is known to breed on Wright's Field. BCLT has noted erosion issues in the past along this segment of trail and recommended the County close it to minimize further erosion issues. To accommodate this request, the County is proposing to close that trail as part of the project. One trail segment that would remain open leads visitors into Wright's Field Preserve just north of the area where western spadefoots are known to breed. This trail is less steep, and erosion is not a concern in this segment.

Spadefoots forage only during brief periods; therefore, it is unlikely that trail users and/or their pets would pose a risk to western spadefoots from being crushed, predated, or killed. For most of the year, western spadefoots are underground in protected burrows; when foraging, they typically do so

at night. Moreover, it is not anticipated that the presence of the active park or formalization of existing trails would dramatically increase the number of users on the trails such that the small number of western spadefoots that may be foraging during the day at peak breeding times would face a significantly higher risk from direct crushing or predation. These risks are currently present and will continue to be present but pose a very minimal risk to western spadefoots. As a result, operational impacts on western spadefoot would be less than significant.

Birds

Similar to QCB, discussed above, special-status avian species may be affected by increases in the number of hikers using the trail system because they may be flushed from their resting or nesting locations more often with increased foot traffic. Increased rates of flushing in avian species has the potential to negatively impact thermoregulation abilities, nesting success, and ability to forage for food successfully. Thresholds vary for how many users can be in an area before birds are negatively affected, but it is generally accepted that more visitors will cause more wildlife effects (CDFW 2020). Dog-specific disturbance (e.g., lingering dog scent, predation) has been studied for birds, with no evidence that birds become habituated to dog presence, even with leashed dogs and even where dog walking was frequent (CDFW 2020).

There is also the possibility that increased car traffic within the park footprint may result in additional collisions with avian species flying over the park. These impacts may cumulatively result in reduced numbers of special-status avian species as well as a decrease in use of habitat immediately surrounding the project footprint. These impacts would be significant absent mitigation because they could directly and permanently affect Group I wildlife species and/or California Species of Special Concern (**Impact-BIO-13**).

Impacts on nesting birds also may occur during fire fuel management activities proposed for the project. Activities such as vegetation removal or tree limbing could cause direct mortality to special-status and common avian species protected under the MBTA. These impacts would be significant, in accordance with **Impact-BIO-7**, described above. As recommended in the FEOA, nesting bird surveys must be conducted prior to these activities if they are conducted during the nesting season.

Mammals

Special-Status Bats

Operation of the project is not expected to have significant temporary or permanent impacts on special-status bat species. Because bats are nocturnal and the park hours would be from sunrise to sunset, with no night lighting allowed, anthropogenic activity is not expected to have an impact on bat behavior.

Other Special-Status Mammals

The northwestern San Diego pocket mouse, San Diego black-tailed jackrabbit, and Bryant's (San Diego desert) woodrat were determined to have moderate potential to occur within the BSA. These species could experience impacts similar to those described for reptiles, above, during operation of the project. These include collisions with mountain bikes, predation by dogs, and avoidance of habitat areas due to lingering dog scent. Human may can reduce habitat suitability and the carrying capacity of habitat areas for mammals. These impacts may cumulatively result in reduced numbers of special-status mammal species as well as a decrease in use of habitat immediately surrounding the project footprint.

As mentioned above, the County has proposed additional signage and a live-in volunteer and park rangers to monitor the Alpine Preserve and Alpine Park as part of project implementation. Moreover, the public is currently accessing the County property for hiking and mountain biking, in some instances along trails that would be closed as part of the project. The presence of an active park adjacent to these trails is not anticipated to significantly increase mortality or reduce the viability of special-status mammals over the long-term because of the differences in user preferences between the two forms of recreation. There likely would be an increase in the number of horses on the property compared to baseline condition due to the construction of an equestrian staging area. However, horses move much slower than most mammal species, and as such, most mammals, including the three discussed in this section, would be skilled at avoiding hooves. However, these impacts would be significant absent mitigation because they could directly and permanently affect Group I wildlife species and/or California Species of Special Concern (**Impact-BIO-13**).

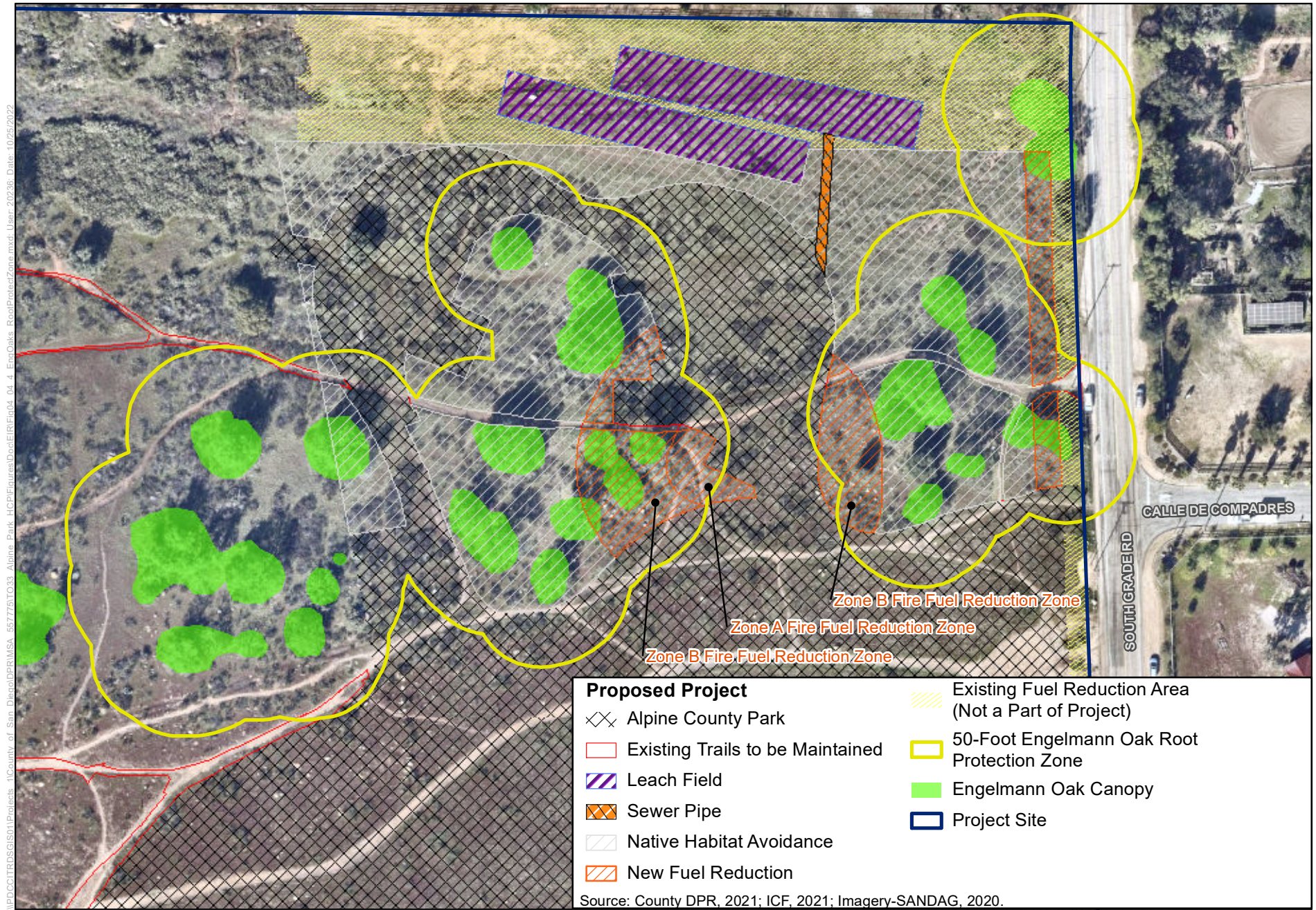
Impact Determination

Implementation of the project would have a substantial adverse effect, either directly or through habitat modifications, on species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations or by CDFW and USFWS. Potentially significant impact(s) include the following:

Impact-BIO-1: Significant Impacts on Decumbent Goldenbush. Of the 226 decumbent goldenbush individuals observed within the survey area, 110 would be affected by the project, which is nearly half of the on-site population. These impacts would be significant on the existing population of decumbent goldenbush, absent mitigation.

Impact-BIO-2: Potentially Significant Impacts on Engelmann Oaks. No direct impacts on any Engelmann oaks would occur because of implementation of the project. Indirect impacts may include potential grading within the root protection zone. Approximately 0.94 acre is within the root protection zone where grading/site preparation (e.g., compaction) and construction of park infrastructure would occur (Figure 4.4-6). Impacts would occur within the root protection zone, but not within the canopy/dripline, of approximately 25 Engelmann oak trees, including one individual that appears to be dying. These oaks are at risk of injury or mortality if construction activities damaged the root zones or aboveground portions of the trees. Canopy thinning may be conducted under the supervision of a certified arborist, as part of fire fuel management in these areas. Engelmann oaks have endured challenges in recent years that threaten the long-term survival of the species; these challenges include development, pest infestations, and climate change impacts. As a result, impacts within the root protection zone and impacts associated with fire fuel management activities could potentially be significant, absent mitigation.

Impact-BIO-3: Significant Impacts on QCB Occupied Habitat During Construction. Occupied QCB habitat would be affected by construction and maintenance of the project. Impacts on occupied QCB habitat would be significant.



0 50 100
Feet
1 in = 104 ft

Figure 4.4-6
Engelmann Oak Root Protection Zone Impacts
Alpine County Park Project

Impact-BIO-4: Significant Impacts on Western Spadefoot. One seasonally inundated basin (AP-7) within which western spadefoot eggs were observed in 2019 would be filled in during construction of the active park. This impact could limit the ability of western spadefoot within the core breeding habitat on Wright's Field to expand territory during wet years. This could cause declines in the core population over time because it would restrict locations where breeding activities could occur and reduce breeding refugia sites. These impacts could potentially be significant, absent mitigation.

Impact-BIO-5: Habitat Impacts on Special-Status Reptiles. Impacts on eight special-status reptile species (California glossy snake, coast patch-nosed snake, coast horned lizard, coastal western whiptail, Coronado skink, orange-throated whiptail, red-diamond rattlesnake, and Southern California legless lizard) could potentially be significant, absent mitigation. Coast horned lizard and orange-throated whiptail are MSCP covered species that are considered adequately conserved with implementation of the South County MSCP. The larger preserve being assembled with implementation of the South County MCSP affords the remaining six species (not covered under the MSCP) additional regional conservation benefits because these species are generalists and can utilize a wide variety of habitats that are permanently protected under the MSCP. As a result, impacts on these species would be less than significant.

Impact-BIO-6: Habitat Impacts on Special-Status Avian Species. Impacts on 22.4 acres of foraging and/or breeding habitat for special-status avian species could potentially be significant, absent mitigation. Southern California rufous-crowned sparrow and ferruginous hawk are MSCP covered species that are considered adequately conserved with implementation of the South County MSCP. The larger preserve being assembled with implementation of the South County MCSP affords some of these generalist species (e.g., Cooper's hawk, red-shouldered hawk, white-tailed kite) additional conservation benefits at a regional level because these species are generalists and can utilize a wide variety of habitats that are permanently protected under the MSCP. As a result, impacts on avian special-status species and raptors would remain less than significant.

Impact-BIO-7: Impacts on MBTA-Protected Avian Species During Breeding Season. Impacts on the nesting success of any bird protected by the MBTA, such as removal of an active nest during construction or the loss of eggs or chicks from construction noise or human presence, would be significant.

Impact-BIO-8: Potential Impacts on Breeding Burrowing Owl. Although not documented as breeding on-site, burrowing owl could begin breeding within areas proposed for construction in the future. Potential impacts on breeding burrowing owl during construction would be significant.

Impact-BIO-9: Impacts on Raptor Foraging Habitat. Impacts on 22.4 acres of prime foraging habitat for raptors would be significant.

Impact-BIO-10: Habitat Impacts on Special-Status Bats. Impacts on up to 22.4 acres of habitat for special-status bats would be significant absent mitigation due to the small home ranges and specialized foraging habits for some of these species, lack of coverage for these species in the MSCP, and the California Species of Special Concern and/or Group I status for most of these species, indicating their relative rarity in the County.

Impact-BIO-11: Potential Impacts on Maternal Bat Roost Sites. Impacts on any bat species roost sites, such as rock crevices or oak trees, could result in direct mortality of adults and possibly juvenile bats. Even if direct impacts on these sites do not occur, roosting females may be negatively affected by increased noise and disturbance within proximity of their roost sites, which could result in increased

mortality of young or similar reduction in fecundity. Furthermore, roosting bats may be very difficult to detect; therefore, it would be hard to know if impacts on roost sites were occurring, absent detailed studies using mist nesting, tracking, and telemetry. Direct or indirect impacts on roost sites causing mortality or reproductive decline in special-status bats would be significant, absent mitigation.

Impact-BIO-12: Impact on Other Special-Status Mammals During Construction. Impacts on special-status mammal species would be significant, absent mitigation. The larger preserve being assembled with implementation of the South County MCSP affords these species some conservation benefits at a regional level because these species are generalists and can utilize a wide variety of habitats that are permanently protected under the MSCP. However, these species are not covered under the MSCP, and as such, impacts on these species would be significant, absent mitigation.

Impact-BIO-13: Impacts on Group I Wildlife Species/California Species of Special Concern During Operation. Operation of the proposed project may result in reduced numbers of special-status species due to an increase in mortality rates as well as a decrease in use of habitat immediately surrounding the project footprint. These impacts on Group I Wildlife Species/California Species of Special Concern could potentially be significant, absent mitigation.

Mitigation Measures

The County DPR proposes the following mitigation measures to reduce potentially significant impacts to below a level of significance.

For **Impact-BIO-1: Significant Impacts on Decumbent Goldenbush**

MM-BIO-1: Replace Decumbent Goldenbush. To mitigate for significant impacts on decumbent goldenbush, the County DPR shall replace at a 3:1 mitigation ratio any affected decumbent goldenbush individuals. Individual plants and/or seeds will be salvaged from the onsite population prior to the start of construction and installed within the open space/preserve. Plantings shall be monitored for a minimum of 3 years to ensure the 3:1 mitigation ratio has been met and that the planted individuals have properly established themselves. Seed/material from onsite populations may be contract grown to provide replacement plantings.

For **Impact-BIO-2: Potentially Significant Impacts on Engelmann Oaks**

MM-BIO-2: Implement Engelmann Oak Avoidance and Minimization Measures. The following measures will minimize and avoid potential impacts on Engelmann oaks resulting from the Project:

1. Engelmann oaks within 50 feet of any mass grading shall be fenced entirely around the tree dripline to ensure that no construction activities, including equipment staging, vegetation grubbing, driving, or grading, occur within the tree's dripline. These restrictions shall be communicated to the construction contractor prior to work in this area.
2. To mitigate for any potential significant impacts to Engelmann oak trees, the County will monitor the health of all Engelmann oaks within 200 feet of the proposed Alpine County Park development footprint for 5 years following construction. A certified arborist with experience monitoring oak health will conduct the monitoring. Mortality or serious declines in the health of the Engelmann oaks during these 5 years within this area will be mitigated at a 3:1 ratio, should significant impacts occur. Specifically, three Engelmann oaks will be planted for each oak tree that has died or is in serious decline. The mitigation would occur

within on-site Engelmann oak woodland areas that will be permanently protected. Planting shall occur within either the Native Habitat Protection Area or within the northwestern portion of the open space preserve. All oak plantings must be certified pathogen free, including for *Phytophthora* species.

3. Any areas within the Engelmann oak root protection zone (i.e., all areas within 50 feet of Engelmann oak canopy) shall be identified on a map that is provided to the construction contractor. Any grading or construction activities within the root protection zone shall be monitored to minimize impacts on oaks to the maximum extent possible. Training shall be provided for the construction contractor by a biological monitor prior to the start of construction activities in this area. This training will detail ways that the construction contractor can reduce impacts as much as possible on Engelmann oaks within the root protection zone. The following avoidance and minimization measures must be implemented: (1) minimizing repetitive travel routes within the root protection zone, (2) restricting any long-term storage of heavy materials within the root protection zone, and (3) restricting work within the root protection zone when the ground is wet to avoid compaction as much as possible after a rain event. Additional avoidance and minimization measures not envisioned here that can be feasibly implemented during construction must be identified and implemented.

For Impact-BIO-3: Significant Impacts on QCB-Occupied Habitat During Construction

MM-BIO-3: Ensure No Net Loss of Quino Host Plants and Provide Permanent Protection of Quino Habitat. The County DPR shall seek a Section 10 Incidental Take Permit (ITP) for impacts on QCB-occupied habitat and comply with any additional mitigation required by the ITP. Regardless of the conservation measures required under the ITP, the County will mitigate for impacts on occupied QCB habitat by providing, at a minimum, on-site preservation of occupied habitat for QCB within the open space/preserve and ensure that no net loss of QCB host plants will occur because of the project. The County DPR shall ensure that there is no net loss of QCB host plants by performing on-site enhancement and restoration activities within QCB habitat, including planting dot-seed plantain, removing thatch to support healthy populations of dot-seed plantain, and maintaining and monitoring these enhancement areas for a minimum of 5 years. Construction activities shall not occur until the ITP is secured. Conservation measures shall be implemented pursuant to that ITP and will include measures to restore and enhance QCB habitat and provide permanent habitat protection and maintenance activities within the open space/preserve.

As part of its ongoing monitoring, the County will demonstrate that QCB persists on the project site at the end of the 5-year restoration and enhancement period. If QCB can no longer be found on either the County's preserve or within the adjacent Wright's Field in a normal flight-year at the end of the 5-year restoration period, the County will secure a specific off-site parcel that will contribute meaningfully to the species' long-term conservation.

For Impact-BIO-4: Significant Impacts on Western Spadefoot

MM-BIO: 4 Western Spadefoot. The County will mitigate for impacts on one western spadefoot breeding pool, approximately 157 square feet in size, by creating three permanent basins, encompassing a minimum of 471 square feet, to support western spadefoot breeding. These constructed basins will be created within clay soils on the permanently protected lands on the County's parcel, no closer than 100 feet from the western edge of Alpine Park. Basins will be constructed within approximately 262 meters of the core breeding population on Wright's Field

to maximize opportunities for western spadefoots on Wright's Field to naturally expand into these newly constructed basins. No basins will be constructed within the areas proposed for QCB habitat enhancement activities.

Hydrological analysis will be conducted prior to site selection to map the micro-watersheds in potential sites and ensure the constructed basins fill naturally with rainwater. Basins will be constructed to allow for maximum inundated depths of approximately 18 to 24 inches (20 to 60 centimeters), with the goal that they remain inundated long enough to increase the chances for breeding to be successful during dry years. Conversely, the newly constructed basins shall be designed in such a way that they support standing water for only several weeks following seasonal rains and aquatic predators (e.g., fish, bullfrogs, crayfish) cannot become established. Because ponding duration is so critical to the success of this effort, additional studies may be needed to estimate infiltration rates, soil profile, depth of clay soil layer, etc. The County will conduct these studies, as needed, to estimate the ponding duration within constructed basins. Terrestrial habitat surrounding the proposed relocation site shall be as similar in type, aspect, and density to the location of the existing pool(s), as feasible.

The County will develop a Western Spadefoot Habitat Mitigation and Monitoring Plan to describe requirements for the constructed basins, how basin sites are chosen, what activities will be conducted during the installation of the new basins, adaptive management, maintenance activities, access controls (e.g., fences), and what monitoring and reporting activities will occur and when. The data for the micro-habitat hydrological analysis will also be presented within this plan. The Western Spadefoot Habitat Mitigation and Monitoring Plan will be provided to the CDFW and USFWS for review and comment.

The new basins will be constructed concurrently with Alpine Park, and western spadefoots observed within the project footprint will be relocated to suitable basins outside the project footprint.

Monitoring of the newly constructed basins will be conducted during the wet season (approximately December through April) at approximately weekly intervals, beginning with the first significant rain event each year for 5 years following completion of basin construction. The County's biologist will map the spatial extent of the basins, document the inundation depths of the basins and breeding outcomes, and determine if adaptive management is needed to increase survival and recruitment within the constructed basins. Notes will be made if egg masses or larvae are observed. One nocturnal adult survey will also be conducted in each of the 5 years when a breeding event is occurring in order to document the foraging/mobility patterns of western spadefoots in the area of the new basins. The County will also monitor the core breeding population on the Wright's Field Preserve, using the same methods described above (i.e., basin mapping, weekly checks, nocturnal survey) to document the population dynamics of the entire population over time.

Monitoring/survey data will be provided to CDFW and USFWS by the monitoring biologist following each monitoring period; a written report summarizing the monitoring results will be provided to CDFW and USFWS at the end of the monitoring effort each year. Success criteria for the monitoring program shall include evidence of a ponding duration that is suitable for western spadefoot reproduction within at least one of the constructed basins during at least one of the 5 years of monitoring.

After exclusionary fencing has been installed around all initial proposed ground-disturbing construction, but prior to initiation of initial ground disturbance, the spadefoot biologist will conduct at least three nighttime surveys for spadefoots within the fenced area. Surveys will

continue until no more spadefoots are captured and relocated out of the fenced footprint and/or upon the recommendations of the spadefoot biologist. These surveys will be conducted during appropriate climatic conditions and during the appropriate hours (i.e., nighttime, during rain events in breeding season) to maximize the likelihood of encountering spadefoots. If climatic conditions are not highly suitable for spadefoot activity, spadefoot habitat in the project footprint will be watered to encourage aestivating toads to surface. All spadefoots found within the project area will be captured and translocated by the spadefoot biologist to the nearest suitable habitat outside of the work area. Upon completion of these surveys and prior to initiation of construction activities, the spadefoot biologist will report the capture and release locations of all spadefoots found and relocated during these surveys to CDFW and USFWS.

For Impact-BIO-5: Habitat Impacts on Special-Status Reptiles

APM-BIO-1: Establishment of the Open Space Preserve and **MM-BIO-9: Provide Compensatory Habitat-Based Mitigation** (see Threshold 2, below). Habitat-based mitigation will be provided consistent with **MM-BIO-9**, below, for significant impacts on special-status reptiles.

For Impact-BIO-6: Habitat Impacts on Special-Status Avian Species

APM-BIO-1: Establishment of the Open Space Preserve and **MM-BIO-9: Provide Compensatory Habitat-Based Mitigation** (see Threshold 2, below). Habitat-based mitigation will be provided consistent with **MM-BIO-9**, below, for significant impacts on special-status avian species.

For Impact-BIO-7: Impacts on MBTA-Protected Avian Species During Breeding Season

MM-BIO-5: Avoid and Minimize Impacts on Special-Status Avian Species and Other Birds Protected under the MBTA. To mitigate for potentially significant impacts on sensitive nesting birds and raptors, the County DPR shall avoid ground-disturbing activities during the bird breeding season to keep the project in compliance with state and federal regulations regarding nesting birds (i.e., the federal MBTA and California FGC). The bird breeding season is defined as January 15 to September 15, which includes the tree-nesting raptor breeding season of January 15 to July 15, the ground-nesting raptor breeding season of February 1 to July 15, and the general avian breeding season of February 1 to September 15.

If removal cannot be avoided during the bird and/or raptor nesting season, a nesting bird survey shall be conducted no more than 72 hours prior to ground-disturbing activities by a qualified avian biologist within 500 feet of proposed ground- or vegetation-disturbing activities. Biologists will also survey for raptor nests up to 1,500 feet from proposed ground- or vegetation-disturbing activities. This is necessary to definitively ascertain whether raptors or other migratory birds are actively nesting on the project site or in a vicinity that could be indirectly affected by work activities (i.e., through noise or visual disturbances). Special attention will be paid to determining the presence of nesting grassland-endemic bird species, such as grasshopper sparrow, that may be nesting within the dense grasses present within the proposed development footprint.

If any active nests are detected, the area shall be flagged and mapped on construction plans, along with a buffer, as recommended by the qualified biologist. The buffer area(s) established by the qualified biologist shall be avoided until the nesting cycle is complete or it is determined that the nest is no longer active. The qualified biologist shall be a person familiar with bird breeding

behavior and capable of identifying the bird species of San Diego County by sight and sound. The biologist shall determine if alterations to behavior have occurred as a result of human interaction. Buffers may be adjusted, based on observations by the biological monitor of the response of nesting birds to human activity.

For **Impact-BIO-8: Potential Burrowing Owl Breeding Impacts**

MM-BIO-6: Burrowing Owl Preconstruction Surveys. Prior to initiation of project clearing, grading, grubbing, or other construction activities, pre-construction surveys for the presence of burrowing owl, to verify species absence, will be conducted, including surveying suitable habitat within the project footprint and a 300-foot buffer by a qualified biologist; no grading shall occur within 300 feet of an active burrowing owl burrow. The pre-construction surveys shall follow the take avoidance survey methods outlined in the *Staff Report on Burrowing Owl Mitigation* (CDFW 2012). The first survey shall be conducted within 30 days of initial site disturbance, and the second survey shall occur within 24 hours of initial site disturbance.

Following the initial pre-grading survey, the project site will be monitored for new burrows each week until grading is complete. Subsequent pre-construction surveys will be required if lapses in the project occur that exceed 72 hours. If present in the project construction footprint or within 300 feet of the project site, coordination with CDFW and USFWS shall occur to establish measures to avoid potential impacts on burrowing owl. Such measures will be decided in coordination with the CDFW and USFWS and follow the “Strategy for Mitigating Impacts to Burrowing Owls in the Unincorporated County” (Attachment A of the County’s Report Format and Content Requirements – Biological Resources).

Following the first pre-construction survey within 30 days of initial site disturbance, the qualified biologist will submit a Pre-Grading Survey Report to the County, CDFW, and USFWS within 14 days of the survey and include maps of the project site. If any burrowing owls are observed, the burrowing owl locations on aerial photos and in the format described in the mapping guidelines of the County’s Report Format and Content Requirements – Biological Resources will be included. A qualified biologist will attend the pre-construction meeting to inform construction personnel about the burrowing owl requirements.

For **Impact-BIO-9: Impacts on Raptor Foraging Habitat**

APM-BIO-1: Establishment of the Open Space Preserve and **MM-BIO-9: Provide Compensatory Habitat-Based Mitigation** (see Threshold 2, below). Habitat-based mitigation will be provided consistent with **MM-BIO-9**, below, for significant impacts on raptor foraging habitat.

For **Impact-BIO-10: Habitat Impacts on Special-Status Bats**

APM-BIO-1: Establishment of the Open Space Preserve and **MM-BIO-9: Provide Compensatory Habitat-Based Mitigation** (see Threshold 2, below). Habitat-based mitigation will be provided consistent with **MM-BIO-9**, below, for significant impacts on pallid bat foraging habitat.

MM-BIO-7: Support Pallid Bat. The County DPR shall work with a bat expert to design and install bat boxes that attract pallid bat prior to vegetation removal activities commencing on the site. These bat boxes should be designed to accommodate both solitary individuals and maternal roost sites. Bat box design should reflect the best practices at the time of installation and be

specific to larger-sized bats like pallid bat with respect to roost chamber sizes, etc. Design and placement of bat boxes should also consider how to best maintain proper roost temperature. When possible, the bat boxes should be placed along the edges of the wooded areas on the site. Final design, numbers, and placement of bat boxes will be determined by the bat expert in consultation with County DPR using the best practices known at the time.

Monitoring of the bat boxes shall be conducted quarterly for the first 2 years and twice yearly during years 3 through 5 after installation. Any problems that are noted (e.g., mortality, predation) shall be addressed in consultation with the bat expert. Occupancy status, including species, numbers, etc., shall be documented to the extent possible without disturbing the occupants. If, after the first 2 years, a bat box remains unoccupied by any bat species, the County DPR and bat expert will discuss if the bat box needs to be repositioned on the site or redesigned. An annual report shall be prepared by the bat expert or designee to document the findings of the monitoring visits. The County will provide copies of this annual report to the CDFW and also include updates on the bat box monitoring on the site in the County's annual report for the MSCP.

For **Impact-BIO-11: Potential Impacts on Maternal Bat Roost Sites**

MM-BIO-8: Bat Roost Avoidance. Because of the difficulty in detecting all potentially occurring roosting bats (e.g., the western red bat within the Engelmann oaks, pallid bats within rock crevices), no construction activities that could disturb maternal roost site will occur during the pupping season (typically April 1 through August 31). This measure specifically precludes high-frequency surveying as well as intensive noise-generating activities (e.g., jack-hammering) within 200 feet of any Engelmann oaks or rock outcrops during the pupping season.

If construction activities must occur within this 200-foot avoidance buffer during the pupping season, the County will conduct definitive bat roost surveys to determine the presence or absence of maternal day-roost and/or night-roost locations within the 200-foot avoidance buffer that overlaps the construction footprint. The bat biologist(s) who conduct these surveys shall have the appropriate education, training, and experience. The bat roost survey methodology will be described in a Bat Roost Management, Monitoring, and Mitigation Plan, which will be prepared at least 30 days prior to the start of construction and provided to CDFW.

Bat roost survey methods may include mist netting and tracking individual bats using telemetry and/or additional acoustic surveys that are timed to determine if individual Engelmann oaks or rock outcrops within the 200 foot avoidance buffer are supporting bat roost sites. If any maternal roost sites within the 200 foot avoidance buffer are identified, an appropriate avoidance buffer shall be established around that roost site in accordance with the requirements established in the Bat Roost Management, Monitoring, and Mitigation Plan. Avoidance buffer distances will account for the ability of that individual bat species to tolerate specific types of low- and high-frequency construction noise and other human disturbance associated with the project. No construction activities that could disrupt the roost site will be permitted within the established avoidance buffer.

Bat biologists will monitor construction activities occurring adjacent to the avoidance areas for the bat roost sites in accordance with the Bat Roost Management, Monitoring, and Mitigation Plan. Monitoring frequency and duration also will conform to the Bat Roost Management, Monitoring, and Mitigation Plan and be used to determine that the established bat roost avoidance buffers are large enough to prevent maternal roost site impacts, including, but not limited to, roost site abandonment. Avoidance buffers will be expanded if any stress or disturbance to the maternal roost site is observed during monitoring. In years 1, 3, and 5

following construction completion, the County will conduct bat surveys, including maternal bat roost surveys, within the areas originally surveyed prior to construction.

If the maternal bat roost sites previously observed prior to and during construction are still observed during these monitoring surveys, no additional mitigation will be required. If any maternal roost sites observed prior to or during construction are no longer present (i.e., are not observed in any of the three post-construction surveys), the County will mitigate for the loss of the maternal roost site at a 2:1 ratio using methods agreed upon in the Bat Roost Management, Monitoring, and Mitigation Plan. This may include planting additional Engelmann oaks within the proposed preserve if the affected maternal roost site utilized Engelmann oak trees or by building artificial bat roosts specifically for the affected bat species.

For Impact-BIO-12: Habitat Impacts on Special-Status Mammals

APM-BIO-1: Establishment of the Open Space Preserve and **MM-BIO-9: Provide Compensatory Habitat-Based Mitigation** (see Threshold 2, below). Habitat-based mitigation will be provided consistent with **MM-BIO-9**, below, for significant impacts on special-status mammals.

For Impact-BIO-13: Impacts on Group I Wildlife Species/California Species of Special Concern During Operation.

APM-BIO-1: Establishment of the Open Space Preserve and **MM-BIO-9: Provide Compensatory Habitat-Based Mitigation** (see Threshold 2, below). Habitat-based mitigation will be provided consistent with **MM-BIO-9**, below, for significant impacts on special-status wildlife species resulting from implementation of the proposed project.

Level of Significance After Mitigation

Impact-BIO-1 through **Impact-BIO-10** would be reduced to less than significant after implementation of **MM-BIO-1** through **MM-BIO-7** as well as the habitat-based mitigation described under **MM-BIO-9** below.

The planned Alpine Preserve, to be created with implementation of the project, contains all key habitat components required by QCB, including significant host plant populations, nectaring resources, and hilltops and ridgelines. The Alpine Preserve is also contiguous with existing conserved lands located within the Wright's Field Preserve. When combined, 98 percent of the known individual host plants associated with the Alpine Occurrence Complex would be conserved between the two preserves. Similarly, the permanent protection of habitat for special-status plant and wildlife species within the Alpine Preserve would add an additional 67.5 acres to the approximately 380 acres of open space (including Wright's Field and privately held open space land, some of which is permanently protected through conservation easements) in the immediate vicinity. Furthermore, pre-construction nesting bird surveys would be conducted in accordance with **MM-BIO-5** to avoid direct mortality of eggs, chicks, or adults during the breeding season. As a result, **MM-BIO-1** through **MM-BIO-9** would reduce the project's impacts on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations or by CDFW or USFWS to a less-than-significant level.

Open Space/Preserve

Impact Discussion

County DPR would implement conservation measures in the project's Habitat Conservation Plan to preserve occupied habitat for QCB and ensure no net loss of QCB host plants from the project. The Habitat Conservation Plan proposes protection of habitat and permanent on-site restoration and enhancement of QCB habitat within the open space/preserve. Long-term management of the open space/preserve would also occur as part of the County's commitment to species conservation as a signatory to the MSCP and as outlined in an RMP that will be prepared for the project.

There is the possibility that impacts on special-status wildlife and special-status plants may occur during long-term management and habitat restoration/enhancement activities. Palmer's grapplinghook, for instance, occurs in habitats similar to those of dot-seed plantain. Individual Palmer's grapplinghook occurrences have been mapped and included in the habitat enhancement plans, with specific measures to avoid these areas and any future occurrences of special-status plants that are noted during restoration/enhancement activities. There is also potential for inadvertent take of a small number of QCB to occur in the open space preserve when implementing habitat management activities through accidental trampling of QCB larvae. These impacts would be avoided by ensuring that habitat restoration/enhancement activities occur only outside of the flight season for QCB and that work directly within patches of dot-seed plantain is prohibited.

Impact Determination

The purpose of the long-term management and habitat restoration activities is to improve habitat for special-status species. These benefits would outweigh potential impacts on special-status species resulting from management/restoration actions. As a result, impacts on special-status species from these actions would be less than significant.

Mitigation Measures

No mitigation is required.

Level of Significance After Mitigation

Impacts would be less than significant.

Threshold 2: The project would have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by CDFW or USFWS.

County Park and Trails

Impact Discussion

The clearing of native vegetation during grading and site preparation would be required for construction of the project. Development of the project would result in direct permanent impacts on up to 23.1 acres of land, of which 22.4 acres are considered sensitive natural communities and classified as Tier I through Tier III (Table 4.4-4) (Figure 4.4-1). Table 4.4-4 summarizes the maximum project impacts on habitat types/vegetation communities from development of the project.

Table 4.4-4. Maximum Project Impacts on Vegetation Communities and Land Cover

Vegetation Community/Land Cover ^a	Impact Type Tier ^c	Permanent Impacts ^d			Temporary Impacts		Impact Neutral	Total
		Active Park	Leach Field	New Fire Fuel Modification Areas	Native Habitat Avoidance Area	Sewer Pipe	Maintenance of Existing Trails	
Disturbed Habitat (11300)	IV	0.5	0.1	< 0.1	< 0.1	—	1.0	1.6
Diegan Coastal Sage Scrub (32500), Including Disturbed and Baccharis Dominated (32530)	II	< 0.1	—	—	< 0.1	—	—	< 0.1
Disturbed Flat-topped Buckwheat (32800)	II	1.6	0.3	0.3	1.0	< 0.1	—	3.2
Flat-topped Buckwheat (32800)	II	1.7	—	0.1	0.7	< 0.1	—	2.4
Flat-topped Buckwheat – Existing Fire Fuel Modification Zone (32800)	II	< 0.1	—	—	—	—	—	< 0.1
Coastal Sage-Chaparral Transition (37G00)	II	—	—	—	—	—	—	—
Southern Mixed Chaparral (37120)	III	—	—	—	—	—	—	—
Valley Needlegrass Grassland (42100)	I	14.5	—	—	<0.1	—	—	14.5
Valley Needlegrass Grassland – Existing Fire Fuel Modification Zone (42100)	I	0.3	—	—	—	—	—	0.3
Disturbed Valley Needlegrass Grassland (42100)	I	—	—	—	—	—	—	—
Non-Native Grassland (42220)	III	3.6	—	—	—	—	—	3.6
Open Engelmann Oak Woodland (71181)	I	—	—	0.1	0.4	—	—	0.5
Non-Native Woodland (79000)	IV	< 0.1	—	< 0.1	< 0.1	—	—	< 0.1
Eucalyptus Woodland (79100)	IV	—	—	—	—	—	—	—
Total^b		22.2	0.4	0.5	2.1	<0.1	1.0	26.1

a. Vegetation categories and numerical codes are from Holland (1986) and Oberbauer et al. (2008).

b. Individual rows may not sum to total because of rounding.

c. Tier categories are defined in the County's Biological Mitigation Ordinance.

d. An additional 471 square feet of impacts on sensitive natural communities would occur from implementation of the western spadefoot mitigation measure (**MM-BIO-4**), requiring the construction of three basins for spadefoot. It is not known exactly where these basins would be constructed, but impacts would be mitigated in accordance with **MM-BIO-9** and the ratios stipulated in the Biological Mitigation Ordinance.

Construction

Permanent direct impacts on sensitive natural communities would occur, mostly within Valley needlegrass grassland, disturbed flat-topped buckwheat stands, Engelmann oak woodland, and non-native grasslands (**Impact-BIO-14**). Permanent direct impacts on Engelmann oak woodlands were reduced to a minimum during the County DPR's redesign of the concept plan for the proposed park in 2020. The County DPR would avoid all direct impacts (i.e., removal) of individual Engelmann oak trees during construction, and no construction activities (e.g., staging or grading) would occur within any dripline/canopy of Engelmann oaks. See Threshold 1, above, for a complete discussion of potential significant impacts associated with grading and fire clearing in the root protection zones of approximately 25 Engelmann oaks within Engelmann oak woodlands—specifically, within or under the canopy of seven Engelmann oaks. These impacts would be significant per **Impact-BIO-2**, above.

Construction of the project is not anticipated to cause indirect impacts on Valley needlegrass grassland, disturbed flat-topped buckwheat stands, Engelmann oak woodland, or non-native grasslands at levels that would be likely to harm sensitive habitats because of standard BMPs, such as dust control (see Section 4.4-2, *Existing Conditions*). Compliance with the General Construction Permit would require preparation of a Stormwater Pollution Prevention Plan for the project site, which would outline the BMPs that would be implemented during construction activities to prevent soil erosion and runoff from the construction site to nearby sensitive natural communities.

Operation

Although anthropogenic presence is likely to increase through construction of Alpine Park, measures have been sought to reduce impacts on the sensitive natural communities in the adjacent open space/preserve. The current informal trail system would be converted to a more formalized system, discouraging unauthorized uses within open space/preserve. A permanent live-in volunteer would also be situated within Alpine Park, which would further reduce indirect impacts on sensitive habitats through an increased monitoring presence in the area.

Fire fuel reductions zones associated with the proposed project are described in the introductory paragraph of Section 4.4.4. See Threshold 1, above, for a complete discussion of potentially significant impacts associated with fuel management activities that would occur within Engelmann oak woodlands, which would occur in coordination with a certified arborist. These impacts could potentially be significant per **Impact-BIO-2**, above.

Impact Determination

Impact-BIO-14: Direct Impacts on Sensitive Natural Communities. Direct impacts on up to 22.4 acres of Tier I, II, and III sensitive natural communities (i.e., Valley needlegrass grassland, flat-topped buckwheat stands, non-native grasslands) would be significant.

The project would directly and permanently affect Engelmann oak woodland, Valley needlegrass, non-native grassland, and flat-topped buckwheat within a Biological Resource Core Area (BRCA). Engelmann oak woodland and Valley needlegrass are listed as Tier I vegetation communities, flat-topped buckwheat is listed as a Tier II vegetation community, and non-native grassland is listed as a Tier III vegetation community in Attachment K of the Biological Mitigation Ordinance (BMO). Impacts on Tier I through Tier III vegetation communities would be significant, absent mitigation.

Mitigation Measures

The County DPR proposes the following applicant-proposed measure (APM) and mitigation measure to reduce **Impact-BIO-14** to below a level of significance.

APM-BIO-1: Establishment of the Open Space Preserve: As required under the County's MSCP Subarea Plan, Alpine Preserve will be managed in perpetuity in accordance with an RMP. This plan will outline management activities to be carried out by the County. The activities that are likely to be included in the RMP would enhance and preserve the affected sensitive natural communities. These activities include long-term monitoring of on-site preservation areas, non-native and invasive species vegetation management, and habitat restoration in the preserve, as applicable. Through these strategic measures to mitigate for impacts, the preserved sensitive natural communities will be managed to maintain high-quality and functioning habitat and the County DPR will demonstrate its long-term commitment to species conservation within the open space/preserve.

MM-BIO-9: Provide Compensatory Habitat-Based Mitigation. To mitigate for potentially significant impacts on Tier I, Tier II, and Tier III habitats, the County will provide compensatory mitigation consistent with its BMO to reduce significant impacts on sensitive vegetation communities. Mitigation will be provided within open space preserve and/or within offsite location(s), as summarized below.

Table 4.4-5. Mitigation Requirements

Tier ^a	Total Impacts	Mitigation Ratio	Mitigation Requirement	On-site Mitigation ^b	Off-site Mitigation
Tier I	14.86	2:1	29.73	17.48 acres of preservation plus 4.84 acres of restoration (see MM-BIO-10)	7.41 acres of restoration in Wright's Field Preserve (see MM-BIO-10)
Tier II	3.97	1.5:1	5.95	5.95	None
Tier III	3.57	1:1	3.57	None	3.57 ^b

^a. Tiers correspond to those described in the County's BMO.

^b. Habitat-based mitigation for permanent direct impacts on non-native grassland will be satisfied through purchase of credits and/or land acquisition of a similar high-quality non-native grassland in an off-site location.

MM-BIO-10: Native Grassland Mitigation. Impacts on 14.79 acres of Valley needlegrass grassland will be mitigated at a 2:1 ratio through preservation of 10.60 acres of Valley needlegrass grassland and 6.88 acres of open Engelmann oak woodland on-site, in addition to 4.84 acres of restoration of non-native Valley needlegrass grassland within the County's parcel and 7.41 acres of restoration on Wright's Field Preserve. All restoration will be in accordance with a Habitat Restoration and Enhancement Plan (HREP) approved by the Wildlife Agencies (USFWS and CDFW). Success criteria established in that HREP will include achieving at least a 5 percent absolute cover of purple needlegrass within restoration areas while retaining cover and species composition similar to that of the native forbs currently present within non-native grassland areas on-site. If restoration does not meet the restoration goals, the County will implement adaptive management measures, to be approved by the Wildlife Agencies.

Level of Significance After Mitigation

APM-BIO-1, MM-BIO-9, and MM-BIO-10 would provide compensatory mitigation, including through preservation and restoration for **Impact-BIO-14**, thereby reducing potentially significant direct and permanent impacts on sensitive vegetation communities to less than significant.

Open Space/Preserve

Impact Discussion

The County's management of the Alpine Preserve has the potential to affect sensitive natural communities. County DPR will implement conservation measures in the project's Habitat Conservation Plan to ensure no net loss of QCB host plants from the project site. These activities will result in the potential for disturbance to sensitive natural communities within the QCB enhancement areas, such as trampling and raking vegetation to reduce the total load of non-native grass seeds. Restoration of non-native grass areas to native grasslands also could result in similar impacts. Long-term management of the open space/preserve will occur as part of the County's commitment to species conservation as a signatory to the MSCP and as outlined in a RMP that will be prepared for the project. These impacts are intended to improve sensitive natural communities over the long-term, and as such, the overall improvement to these habitats would far outweigh any short-term temporary impacts that might occur during restoration work. As such, impacts associated with the County's management of its open space in the Alpine Preserve would be less than significant.

Impact Determination

Impacts on sensitive natural communities from the proposed long-term management and habitat restoration/enhancement activities within the open space/preserve would be less than significant.

Impact-BIO-14: Direct Impacts on Sensitive Natural Communities. Direct impacts on up to 22.3 acres of Tier I, II, and III sensitive natural communities (i.e., Valley needlegrass grassland, flat-topped buckwheat stands, and nonnative grasslands) would be significant.

The project would directly and permanently affect Engelmann oak woodland, Valley needlegrass, nonnative grassland, and flat-topped buckwheat within a Biological Resource Core Area (BRCA). Engelmann oak woodland and Valley needlegrass are listed as Tier I vegetation communities, flat-topped buckwheat is listed as a Tier II vegetation community, and nonnative grassland is listed as a Tier III vegetation community in Attachment K of the Biological Mitigation Ordinance (BMO). Impacts on Tier I through Tier III vegetation communities would be significant, absent mitigation.

Mitigation Measures

The County DPR proposes **APM-BIO-1** and **MM-BIO-9** (above) to reduce **Impact-BIO-14** to below a level of significance.

Level of Significance After Mitigation

APM-BIO-1, MM-BIO-9, and MM-BIO-10 would provide compensatory mitigation, including through preservation and restoration for **Impact-BIO-14**, thereby reducing potentially significant direct and permanent impacts on sensitive vegetation communities to less than significant.

Threshold 3: The project would not have a substantial adverse effect on state or federally protected wetlands (including, but not limited to marshes, vernal pools, coastal areas, etc.) through direct removal, filling, hydrological interruption, or other means.

Impact Discussion

No wetland features or aquatic resources were found within the BSA during any field surveys. As a result, there would be no impact on any state or federally protected wetlands (including, but not limited to, marshes, vernal pools, coastal areas) from the project.

Impact Determination

The project would not have a substantial adverse effect on state or federally protected wetlands. Impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Level of Significance After Mitigation

Impacts would be less than significant.

Threshold 4: The project would not substantially interfere with the movement of any native resident or migratory fish or wildlife species, or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.

Impact Discussion

The BSA and the adjacent Wright's Field are surrounded by low-density exurban residential development. As such, the BSA and Wright's Field currently function as an "island" of habitat with limited connectivity to open space and other preserve areas. The project would be constructed at the eastern edge of this island of open space/preserve, leaving a smaller but similarly situated island of habitat west of the active park.

Residential development within the past 15 to 20 years in the vicinity of the project site has substantively changed how wildlife can move north and east of the County's parcel. Specifically, three large houses north of the County parcel along Engelmann Oak Lane were built during this time period, restricting the movement of terrestrial mesofauna to the north. Two additional homes east of the intersection of South Grade and Boulder Oak Lane were also built in this timeframe. These homes constrain wildlife movement from the far northeastern corner of the County parcel to points farther east. Large-lot residential development, many with fences around their perimeter, currently restricts wildlife movement from due east of the County parcel to points farther east. Wildlife movement, therefore, north and east of the County parcel is already constrained to backyards where there are gaps in fences or where animals can move under or over fences. Development of the equestrian center at the northern end of the proposed active park would further restrict east-west

movement at this northeastern edge of the County parcel; however, an area of open space (where the leach field for the septic system is proposed), approximately 100 feet in width, would remain in this area for east-west movement of terrestrial fauna.

On the southern end of the proposed park, development could potentially constrain wildlife movement from south to north for approximately 500 feet where the active park is proposed directly north of the Findel Ranch portion of Wright's Field. This 500-foot stretch represents only approximately 30 percent of the total linear distance where wildlife ostensibly cross from protected lands (i.e., the Findel Ranch section of Wright's Field) south of South Grade Road into the Wright's Field/County parcel to the north, or vice-versa. Approximately 1,060 feet remain where wildlife could cross from the Findel Ranch portion of Wright's Field into the proposed Alpine Preserve, ensuring that wildlife movement would continue to the extent it currently does in that portion. Most small mammals/meso-carnivore that are expected to use these habitat blocks can utilize widths of less than 1,000 feet as movement corridors. As a result, a reduction of approximately 30 percent of the width of this corridor from the proposed project would not substantially change wildlife movement patterns from baseline conditions.

Development of the Project would not significantly alter the way that wildlife utilize this contiguous block of open space. The conversion of 22.4 acres of native habitat to a developed park facility would not significantly constrain wildlife movement because the park would be adjacent to existing development on three sides and situated at the far eastern edge of the approximately 450-acre contiguous block of habitat in the immediate vicinity (i.e., the adjacent Wright's Field Preserve and privately held, directly contiguous open space lands in the immediate vicinity of the proposed Project, some of which are protected through a conservation easement). The Alpine Park Preserve would be created on the western edge of the park, contiguous to Wright's Field Preserve, and maintained as an MSCP preserve in perpetuity. Trails would be utilized by medium and large mammals for ease of movement through the preserve, similar to baseline conditions. No features would be constructed that would impinge any movement areas, including ridgelines or canyons.

There is the potential for more vehicle collisions along South Grade Road compared to baseline conditions because the proposed park would draw additional vehicles to this portion of South Grade Road. However, there is currently a risk associated with this crossing, and the relative impact of the park on traffic in this area is not anticipated to result in a significant impact on existing wildlife movement in this area.

Impact Determination

The project would not result in substantial interference with the movement of any native resident or migratory fish or wildlife species, or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. Impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Level of Significance After Mitigation

Impacts would be less than significant.

Threshold 5: The project would conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, or conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state Habitat Conservation Plan.

Impact Discussion

The project would be consistent with the MSCP, the County General Plan, and the ACP. It would not conflict with any Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state Habitat Conservation Plan. This is described within the *Multiple Species Conservation Program Conformance Statement* document, which is included as Attachment E of this EIR.

The proposed volunteer parking pad would be within the northern end of Alpine Park. The location results in the need for a Zone A and Zone B fire fuel modification zone, as described above. The County Consolidated Fire Code, Section 4907.2, Fuel Modification (f), states:

When the subject property contains an area designated to protect biological or other sensitive habitat or resource, no building or other structure requiring a fuel modification zone shall be located so as to extend the fuel modification zone into a protected area.

The County redesigned the site plan in the fall of 2022 to move the volunteer parking pad from its previous location, approximately 12 feet from the edge of the proposed preserve, and avoid having the fire fuel modification zone (Zone A and Zone B) extend into the preserve. Its new location is more centrally located, directly adjacent to the equestrian staging area; it extends into the Native Habitat Avoidance Area within the equestrian center loop road. The Native Habitat Avoidance Area would be preserved after construction is complete. As such, the placement of this volunteer parking pad is not entirely consistent with these provisions in the County Consolidated Fire Code and as such, the impacts would be significant (**Impact-BIO-15**).

Impact Determination

Impact-BIO-15: Conflicts with County Consolidated Fire Code. The project would potentially conflict with the County's Consolidated Fire Code—specifically, the provision to prevent impacts within a biological open space/preserve contained in Section 4907.2, Fuel Modification (f). Impacts would be potentially significant, absent mitigation.

Mitigation Measures

The County DPR proposes the following APM and mitigation measure to reduce **Impact-BIO-15** to below a level of significance.

APM-BIO-1: Establishment of the Open Space Preserve and **MM-BIO-9: Provide Compensatory Habitat-Based Mitigation** (see Threshold 2). Habitat-based mitigation will be provided consistent with **MM-BIO-9**, above, for significant impacts on special-status reptiles.

Level of Significance After Mitigation

Impacts would be less than significant after mitigation.

4.4.5 Summary of Significant Impacts

Table 4.4-6. Summary of Significant Biological Resources Impacts and Mitigation Measures

Summary of Potentially Significant Impact(s)	Summary of Mitigation Measure(s)	Level of Significance After Mitigation	Rationale for Finding After Mitigation
Impact-BIO-1: Significant Impacts on Decumbent Goldenbush	MM-BIO-1: Replace Decumbent Goldenbush	Less than Significant	Mitigation ensures that no net loss of decumbent goldenbush individuals will occur.
Impact-BIO-2: Potentially Significant Impacts on Engelmann Oaks	MM-BIO-2: Implement Engelmann Oak Avoidance and Minimization Measures	Less than Significant	Any potential impacts on Engelmann oak resulting from grading or compaction in the root protection zone or fire clearing will be mitigated through on-site planting, resulting in no net loss of Engelmann oaks on-site.
Impact-BIO-3: Significant Impacts on QCB-Occupied Habitat During Construction	MM-BIO-3: QCB Mitigation	Less than Significant	Impacts on QCB-occupied habitat will be mitigated through permanent on-site preservation of occupied QCB habitat. Impacts on QCB host plants will be mitigated through a 1:1 replacement through on-site restoration and enhancement. Long-term monitoring of Quino populations on the site will occur; County to confirm persistence of Quino after 5 years or contribute to Quino recovery in a significant way in off-site locations.
Impact-BIO-4: Significant Impacts on Western Spadefoot	MM-BIO-4 Western Spadefoot Mitigation	Less than Significant	Impacts on one breeding pool will be mitigated by constructing three new breeding pools closer to the core breeding population on Wright's Field. Impacts during construction will be avoided by installing exclusionary fencing and translocating individuals to outside of the construction footprint.

Summary of Potentially Significant Impact(s)	Summary of Mitigation Measure(s)	Level of Significance After Mitigation	Rationale for Finding After Mitigation
Impact-BIO-5: Habitat Impacts on Special-Status Reptiles	APM-BIO-1 Establishment of the Open Space Preserve MM-BIO-9: Provide Compensatory Habitat-Based Mitigation	Less than Significant	Permanent protection of habitat for these species will occur within the Alpine Preserve and in off-site locations (non-native grasslands), reducing impacts to less than significant.
Impact-BIO-6: Habitat Impacts on Special-Status Avian Species	APM-BIO-1 Establishment of the Open Space Preserve MM-BIO-9: Provide Compensatory Habitat-Based Mitigation	Less than Significant	Permanent protection of habitat for these species will occur within the Alpine Preserve and in off-site locations (non-native grasslands), reducing impacts to less than significant.
Impact-BIO-7: Impacts on MBTA-Protected Avian Species During Breeding Season	MM-BIO-5: Avoid and Minimize Impacts on Special-Status Avian Species and Other Birds Protected under the MBTA	Less than Significant	Avoidance of nests during construction will ensure no direct mortality of eggs or chicks will occur.
Impact-BIO-8: Potential Impacts on Breeding Burrowing Owl	MM-BIO-6: Burrowing Owl Preconstruction Surveys.	Less than Significant	Pre-construction take avoidance surveys will be conducted to avoid take of any breeding burrowing owls on-site. If found, consultation with the wildlife agencies will occur to ensure burrowing owl are not negatively affected by the project.
Impact-BIO-9: Impacts on Raptor Foraging Habitat	APM-BIO-1 Establishment of the Open Space Preserve MM-BIO-9: Provide Compensatory Habitat-Based Mitigation	Less than Significant	Permanent protection of habitat for these species will occur within the Alpine Preserve and in off-site locations (non-native grasslands), reducing impacts to less than significant.

Summary of Potentially Significant Impact(s)	Summary of Mitigation Measure(s)	Level of Significance After Mitigation	Rationale for Finding After Mitigation
Impact-BIO-10: Habitat Impacts on Special-Status Bats	MM-BIO-7: Protect Pallid Bat	Less than Significant	Pallid bat boxes will help attract pallid bats to a permanently protected location in the county (i.e., the open space/preserve) where there is a higher chance for long-term reproductive success than in private parcels where long-term persistence of this species is less certain. Potential stress to pallid bat from the loss of foraging habitat on the project site will be offset by access to bat boxes, providing safe, secure roost sites.
	APM-BIO-1: Establishment of the Open Space Preserve MM-BIO-9: Provide Compensatory Habitat-Based Mitigation		Permanent protection of habitat for these species will occur within the Alpine Preserve and in off-site locations (non-native grasslands), reducing impacts to less than significant.
Impact-BIO-11: Potential Impacts on Maternal Roost Sites	MM-BIO-8: Bat Roost Avoidance	Less than Significant	Avoiding construction activities that could negatively affect the reproductive outcomes of roosting bats will reduce potential significant impacts on these species.
Impact-BIO-12: Habitat Impacts on Special-Status Mammals	APM-BIO-1 Establishment of the Open Space Preserve MM-BIO-9: Provide Compensatory Habitat-Based Mitigation	Less than Significant	Permanent protection of habitat for this taxa group will occur within the Alpine Preserve and in off-site locations (non-native grasslands), reducing impacts to less than significant.
Impact-BIO-13: Operational Impacts on Special-Status Wildlife Species	APM-BIO-1 Establishment of the Open Space Preserve MM-BIO-9: Provide Compensatory Habitat-Based Mitigation	Less than Significant	Permanent protection of habitat for these groups will occur within the Alpine Preserve and in off-site locations (non-native grasslands), reducing impacts to less than significant.

Summary of Potentially Significant Impact(s)	Summary of Mitigation Measure(s)	Level of Significance After Mitigation	Rationale for Finding After Mitigation
Impact-BIO-14: Direct Impacts on Sensitive Natural Communities	APM-BIO-1: Establishment of the Open Space Preserve MM-BIO-9: Provide Compensatory Habitat-Based Mitigation MM-BIO-10: Native Grassland Mitigation	Less than Significant	APM-BIO-1, MM-BIO-9, and MM-BIO-10 provide compensatory mitigation, including preservation and restoration, for Impact-BIO-14 , thereby reducing potentially significant direct and permanent impacts on sensitive vegetation communities to less than significant.
Impact-BIO-15: Conflicts with County Consolidated Fire Code	APM-BIO-1: Establishment of the Open Space Preserve MM-BIO-9: Provide Compensatory Habitat-Based Mitigation MM-BIO-10: Native Grassland Mitigation	Less than Significant	The purpose of the provision in the County Consolidated Fire Code that requires fire fuel management zones not to extend into preserve areas is to reduce impacts on sensitive natural communities and the species that depend on them. APM-BIO-1, MM-BIO-9, and MM-BIO-10 provide compensatory mitigation, including preservation and restoration, thereby reducing potentially significant direct and permanent impacts on sensitive vegetation communities to less than significant.

Section 4.9

Hazards and Hazardous Materials

4.9.1 Overview

This section describes the environmental and regulatory settings for hazards and hazardous materials at the project site. It also describes impacts on hazards and hazardous materials that would result from implementation of the project.

A hazardous material is any substance that, because of its quantity, concentration, or physical or chemical properties, may pose a hazard to human health and the environment. Under California Code of Regulations (CCR) Title 22, the term *hazardous substance* refers to both hazardous materials and hazardous wastes. Both are classified according to four properties: (1) toxicity, (2) ignitability, (3) corrosiveness, and or (4) reactivity (CCR Title 22, Chapter 11). A hazardous material is defined in CCR Title 22 as:

[a] substance or combination of substances which, because of its quantity, concentration, or physical, chemical or infectious characteristics, may either (1) cause, or significantly contribute to, an increase in mortality or an increase in serious irreversible, or incapacitating reversible, illness; or (2) pose a substantial present or potential hazard to human health or environment when improperly treated, stored, transported or disposed of or otherwise managed (CCR Title 22 § 66260.10).

Hazardous materials in various forms can cause death, serious injury, long-lasting health effects, and damage to buildings, homes, and other property. Hazards to human health and the environment can occur during production, storage, transportation, use, or disposal of hazardous materials.

4.9.2 Existing Conditions

4.9.2.1 Hazardous Materials

~~Hazardous~~The hazardous materials information in this ~~chapter~~section is based on a review of the Regional Water Quality Control Board (RWQCB) GeoTracker and Department of Toxic Substances Control (DTSC) EnviroStor online databases. The database review identified the following hazardous materials site within the project footprint ~~and within a 0.25-mile radius of the project site.~~

~~One EnviroStor listing was identified within the project site, High School No 12, Study Area B, Wright's Field, located at 2480 South Grade Road, in Alpine, CA 91901 California.~~ In 2008, the Grossmont Union High School District evaluated the project site ~~as, which was~~ one of three ~~alternative~~ locations considered for the construction of a new high school. A Phase I Environmental Site Assessment (ESA) was prepared as part of the ~~at~~ evaluation. A ~~March 20, 2008,~~ letter from DTSC to the Grossmont Union High School District ~~dated March 20, 2008,~~ concluded that there were no hazardous material releases or presence of naturally occurring hazardous materials ~~at the project site.~~ The letter concurred with the Phase I ESA's conclusion that further investigation at the project site was not required.

There are no other listed hazardous materials sites within the project footprint or within a 0.25-mile radius ~~off~~from the project site.

4.9.2.2 Proximity to Schools

Joan MacQueen Middle School is located approximately 0.4-mile west of the project site at 2001 Tavern Rd, Alpine, ~~CA 91901~~California. Boulder Oaks Elementary School is located approximately 0.7-mile west of the project site at 2320 Tavern Rd, ~~Alpine, CA 91901~~.

4.9.2.3 Proximity to Airports and Airstrips

The nearest airport to the project site is On the Rocks Airport ~~—(1CA6, located), which is~~ approximately 4.5 miles southeast of the project site (AirNav.com 2021).

4.9.2.4 Emergency Response Plan

The County of San Diego ~~(County)~~ Office of Emergency Services (OES) coordinates the County's overall ~~County~~-response to disasters. OES notifies appropriate agencies when a disaster occurs; coordinates with responding agencies; ensures that resources are available and mobilized; plans for disaster response ~~to and recovery from disasters~~; and develops preparedness materials ~~to~~for the public. OES acts as the staff to the Unified Disaster Council (UDC), which was established under a joint powers agreement among all 18 incorporated cities and the County ~~of San Diego that provides for coordination of~~. The UDC coordinates plans and programs countywide to ensure the protection of life and property.

4.9.2.5 Wildfire Hazards

The California Department of Forestry and Fire Protection (CAL FIRE) has mapped areas with significant fire hazards in the county through its Fire and Resource Assessment Program. Specifically, CAL FIRE defines and maps Fire Hazard Severity Zones (FHSZs) to identify the potential fire hazard severity expected in different areas of the state, as required by Public Resources Code (PRC) Sections 4201–4205. FHSZ determinations are based on an area's vegetation, topography (slope), weather (including winds), crown fire potential, and ember production and movement potential. FHSZs are classified as Very High, High, or Moderate in areas of California where the state is responsible for fire protection (i.e., State Responsibility Areas [SRAs]) (CAL FIRE 2007).

According to CAL FIRE's "Fire Hazard Severity Zones in SRA" map, the project site is in a Very High Fire Hazard Severity Zone (VHFHSZ) (CAL FIRE 2007). In response to this designation, the San Diego County Fire Protection District (FPD)/CAL FIRE and the Alpine FPD enforce robust fire prevention regulations in the project area.

A Fire and Emergency Operation Assessment (FEOA) was prepared to identify wildfire risks at the project site (Rohde and Associates 2020~~1~~); the following information in this section is from the FEOA. The FEOA noted that the project site historically has been subject to wildfires. ~~In 2018, the West Fire affected the proposed Alpine County Park site directly. The fire line to contain the West Fire was physically placed in the location of the proposed park's northern boundary. In 1970, the Laguna Fire also burned much of the proposed park area. The FEOA identified the following site-specific wildfire and ignition risks at the project site:~~

Wildland fire protection for the immediate area of Alpine is provided to State Responsibility Area (SRA) wildlands by California Department of Forestry and Fire Protection (CAL FIRE), San Diego Unit. As the contract provider of services for the San Diego County Fire Authority, CAL FIRE also provides structural fire and rescue services to the County's unincorporated areas. CAL FIRE provides regional dispatch services via the Monte Vista dispatch center and specialized wildfire support via air tankers, helicopters, bulldozers, hand crews, and related resources for wildfire suppression.

Some areas of Alpine pose concurrent responsibility for fire protection where Local Responsibility Area (LRA) structural services are provided by the Alpine Fire Protection District (FPD), and CAL FIRE provides the SRA with wildland fire protection. Both agencies respond concurrently in a coordinated manner.

Nearby federal lands of the Cleveland National Forest are under the jurisdiction of the U.S. Department of Agriculture's Forest Service (USFS). USFS is responsible for wildland fire protection on the National Forest and maintains a fire station in the community of Alpine.

Automatic aid agreements exist between CAL FIRE, USFS, and Alpine FPD for response of the closest appropriate resource to a reported emergency, regardless of jurisdictional boundary. According to CAL FIRE's Fire Hazard Severity Zones in SRA Map, the project site is in a Very High Fire Hazard Severity Zone (VHFHSZ) (CAL FIRE 2007). In response to this designation, the San Diego County Fire Authority/CAL FIRE and the Alpine FPD both maintain robust fire prevention regulations in the project area. The FEOA identified the following site-specific wildfire and ignition risks associated with the project site:

- Proximity to South Grade Road, a known location of increased with human related fire ignition factors;
- Adjacency of the site to significant human activity, including homes and ranches;
- Robust public usage of the site for both dispersed and organized recreation;
- Location of the park site with respect to historical major wildfire corridors;
- Heavy fuel concentrations on some County/Back-Country Land Trust (BCLT) lands;
- Current off-road parking and occasional vehicle trespass; and
- Potential increase in ~~demands on~~ demand for local public safety resources due to developed park use.

For additional information on wildfire hazards, as well as prevention measures, please see Section 4.20, *Wildfire*.

4.9.3 Applicable Laws and Regulations

4.9.3.1 Federal

Federal Toxic Substances Control Act/Resource Conservation and Recovery Act/Hazardous and Solid Waste Act

The federal Toxic Substances Control Act (1976) (TSCA) of 1976 and the Resource Conservation and Recovery Act of 1976 (RCRA) of 1976 established a U.S. Environmental Protection Agency (U.S. EPA) administered program to regulate the generation, transport, treatment, storage, and disposal of hazardous waste. TSCA authorized U.S. EPA to secure information on all new and existing chemical substances, and control any of the substances determined to cause unreasonable risks to public health or the environment. The RCRA was amended in 1984 by the Hazardous and Solid Waste Act, which affirmed and extended the “cradle to grave” system of regulating hazardous wastes.

Comprehensive Environmental Response, Compensation, and Liability Act/ Superfund Amendments and Reauthorization Act

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as “Superfund,” was enacted by Congress on December 11, 1980. This law (42 United States Code [USC] 103) provides broad federal authority to respond directly to releases or threatened releases of hazardous substances that may endanger public health or the environment. CERCLA establishes requirements concerning closed and abandoned hazardous waste sites, provides for liability of persons responsible for releases of hazardous waste at these sites, and establishes a trust fund to provide for cleanup when no responsible party can be identified. CERCLA also enabled the revision of the National Contingency Plan (NCP). The NCP (Code of Federal Regulations [CFR] Title 40, Part 300) provides the guidelines and procedures needed to respond to releases and threatened releases of hazardous substances, pollutants, or contaminants. The NCP also established the National Priorities List. CERCLA was amended by the Superfund Amendments and Reauthorization Act on October 17, 1986.

The Emergency Planning and Community-Right-to-Know Act

The Emergency Planning and Community Right-to-Know Act (EPCRA) of 1986 was created to help communities plan for chemical emergencies and respond to concerns regarding environmental and safety hazards resulting from the storage and handling of toxic chemicals. The EPCRA requires the reporting of storage, use, and releases of hazardous substances to federal, state, and local governments.

Section 402 of the Clean Water Act: National Pollutant Discharge Elimination System Permits

Clean Water Act Section 402 establishes the National Pollutant Discharge Elimination System (NPDES), a permitting system for discharges of pollutants, except for dredged or fill material, of any pollutant, into waters of the U.S. In California, Regional Water Quality Control Boards (RWQCB) administer this permitting program in California. Section 402(p) requires

permits for discharges of stormwater from industrial/construction and municipal separate storm sewer systems (MS4s). In addition, construction sites on 1 acre ~~or greater~~ of land or more are required to obtain an NPDES permit.

Occupational Safety and Health Administration

The ~~mission of the~~ Occupational Safety and Health Administration's (OSHA) ~~mission~~ is to ensure the safety and health of American workers by setting and enforcing standards; providing training, outreach, and education; establishing partnerships; and encouraging continual improvement in workplace safety and health. OSHA establishes and enforces protective standards and reaches out to employers and employees through technical assistance and consultation programs. OSHA standards are listed in 29 CFR 1910.

Department of Transportation Hazardous Materials Regulations (49 CFR 100–185)

U.S. Department of Transportation (DOT) hazardous materials regulations cover all aspects of hazardous materials packaging, handling, and ~~transportation. Some topics covered~~ transport. These include Parts 107 (Hazard Materials Program), 130 (Oil Spill Prevention and Response), 172 (Emergency Response), 173 (Packaging Requirements), 174 (Rail Transportation), 176 (Vessel Transportation), 177 (Highway Transportation), 178 (Packaging Specifications), and 180 (Packaging Maintenance).

4.9.3.2 State

Department of Toxic Substances Control Regulations

DTSC regulates hazardous waste, primarily under the authority of the federal RCRA and the California Health and Safety Code (H&SC) (primarily Division 20, Chapters 6.5 through 10.6, and CCR Title 22, Division 4.5). Other laws that affect hazardous waste are specific to handling, storage, transportation, disposal, treatment, reduction, cleanup, and emergency planning. CCR Title 22, Division 4.5, Chapter 11, Article 3, highlights the procedures ~~offor~~ identifying hazardous waste into these 4 categories: ignitable, corrosive, reactive, and toxic. CCR Title 22, Division 4.5, Chapter 11, Article 5, categorizes hazardous waste into acutely hazardous waste, extremely hazardous waste, non-RCRA hazardous waste, RCRA hazardous waste, special waste, and universal waste. CCR Title 22 also underscores the guidelines for managing hazardous waste, which ~~include storing~~ pertain to storage, housekeeping, recordkeeping, and inspecting ~~waste~~.

DTSC's Environmental Health Standards for the Management of Hazardous Waste is included in CCR Title 22, Division 4.5. All hazardous waste generators must comply with the guidelines, ~~which are~~ enforced by DTSC, for identifying, labeling, accumulating, preparing, and preventing outcomes related to hazardous waste.

Cortese List

Government Code Section 65962.5 requires the California Environmental Protection Agency (CalEPA) to develop a list of sites with hazardous waste and substances ~~site list~~ (Cortese List); ~~which. This~~ includes DTSC- and the H&SC-identified hazardous waste sites; State Department of Health Services-listed contaminated public drinking water wells ~~sites~~; SWRCB-listed ~~Underground~~

~~Storage Tank~~underground storage tank (UST) leaks, solid waste facilities, and hazardous waste sites; and other sites as designated by various other state and local governments. Government Code Section 65962.5 requires ~~that the Cortese list~~List to be updated at least annually~~updated: the~~. The Cortese List complies with the CEQA requirements ~~in~~by providing information about the location of hazardous ~~materials release sites~~material releases.

Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Control Act (Porter-Cologne) restricts the disposal of wastes or any other activity that may degrade waters of the state. Porter-Cologne requires the cleanup of wastes that are below hazardous concentrations, but ~~could affect ground and~~capable of affecting the quality of surface water quality and groundwater (§ 13002). Porter-Cologne established nine Regional and State Water Boards, which are primarily responsible for protecting water quality in California. Regional Water Boards regulate discharges by issuing permits through NPDES for waste discharge requirements for nonpoint-source discharges. Anyone discharging materials or proposing to discharge materials that could affect water quality must file a report of waste discharge, unless the discharge would be into a community sewer system.

Hazardous Waste Control Act (§ 25100 et seq.)

DTSC is responsible for enforcing the Hazardous Waste Control Act (H&SC § 25100 *et seq.*), which creates the framework under which hazardous wastes are managed in California. The law provides for the development of a state hazardous waste program that administers and implements the provisions of the federal RCRA cradle-to-grave waste management system in California. It also provides for the designation of California-only hazardous waste and development of standards that are equal to or, in some cases, more stringent, than federal requirements.

Unified Hazardous Waste and Hazardous Materials Management Regulatory Program

The Unified Hazardous Waste and Hazardous Materials Management Regulatory Program (Unified Program) (H&SC Chapter 6.11 §§ 25404–25404.9) provides authority to the Certified Unified Program Agency (CUPA). The County of San Diego, Department of Environmental Health and Quality, Hazardous Materials Division (HMD), has been the CUPA for San Diego County since 1996 (County of San Diego 2021). The Unified Program ~~is the consolidation of~~consolidates six state-regulated environmental programs into one program under CalEPA. The six programs are:

- Aboveground Petroleum Storage Act (APSA) Program,
- California Accidental Release Prevention (CalARP) Program,
- Hazardous Materials Business Plan (HMBP) Program,
- Hazardous Materials Management and Inventory Program,
- Hazardous Waste and Hazardous Waste Treatment Program, and
- UST Program.

California Code of Regulations, Title 8—Industrial Relations

Occupational safety standards exist in federal and state laws to minimize worker safety risks from both physical and chemical hazards in the workplace. The California Division of Occupational Safety and Health (Cal/OSHA) and the federal OSHA are the agencies responsible for assuring worker safety in the workplace. Cal/OSHA assumes primary responsibility for developing and enforcing standards for safe workplaces and work practices. These standards ~~would~~ apply to construction activities.

California Labor Code (Division 5, Parts 1, 6, 7, and 7.5)

The California Labor Code is a collection of regulations that include regulation of the workplace to ensure appropriate training on the use and handling of hazardous materials and operation of equipment and machines that use, store, transport, or dispose of hazardous materials. Division 5, Part 1, Chapter 2.5, ensures that employees who oversee handling hazardous materials are appropriately trained and informed with respect to the materials they handle. Division 5, Part 7, ensures that employees who work with volatile flammable liquids are outfitted with appropriate safety gear and clothing.

California Building Code and Fire Code

The California Fire Code (CFC) ~~is~~ CCR Chapter 9, Title 24, ~~was~~ created by the California Building Standards Commission and based on the International Code Council-created International Fire Code. It is the primary means for authorizing and enforcing procedures and mechanisms to ensure the safe handling and storage of any substance that may pose a threat to public health and safety. The CFC regulates the use, handling, and storage ~~requirements for~~ of hazardous materials at fixed facilities. The CFC and the California Building Code (CBC) use a hazard classification system to determine what protective measures are required to promote fire and protect life safety. These measures ~~may include~~ involve construction standards, ~~separations from property lines~~ line separation, and specialized equipment. To ensure that these safety measures are met, the CFC employs a permit system, based on hazard classification. The CFC is updated every 3 years.

The CFC includes requirements for building construction and vegetation management within ~~areas designated as wildlife-urban interfaces~~ Wildlife Urban Interface (WUI) areas. In such areas, all new buildings must comply with the CBC, which defines ~~wildfire protection~~ building construction requirements ~~intended~~ to reduce wildfire exposure. In addition, buildings within the WUI must comply with California laws and regulations that require maintenance of a “defensible space” of 100 feet from structures (PRC § 4291; CCR § 1299.03). In particular, Chapter 7A establishes minimum standards for the protection of life and property by increasing the ability of a building in an FHSZ and an SRA or WUI fire area to resist the intrusion of flames or burning embers projected by a vegetation fire. Therefore, the CFC contributes to a systematic reduction in conflagration losses.

4.9.3.3 ~~Local~~ Regional

San Diego County Code, Title 6, Division 8

San Diego County Code of Regulatory Ordinances ~~under~~ Title 6, Division 8, Chapters 8 through 11, establishes the HMD as the local CUPA. The HMD, which is responsible for ~~the protection of~~ public health, safety, and the environment ~~and~~, inspects businesses or facilities that handle or store

hazardous materials, generate hazardous waste, generate medical waste, and own or operate USTs. HMD also administers the California Accidental Release Prevention Program and the Aboveground Petroleum Storage Act Program and provides specialized instruction to small businesses through its Pollution Prevention Specialist. HMD has the authority under state law to inspect facilities with hazardous materials or hazardous waste and, in cases where a facility is in noncompliance with the applicable state law or regulations, take enforcement action.

Projects are required to notify HMD regarding the use, handling, release (i.e., spills), storage, or disposal of hazardous materials and hazardous waste in accordance with existing state law and County ordinance. The notification is the initial step in the HMD permitting process, which requires businesses to obtain and maintain a Unified Program Facility Permit if they handle or store hazardous materials, are part of the California Accidental Release Prevention Program, generate or treat hazardous wastes or medical waste, store at least 1,320 gallons of aboveground petroleum, or own or operate USTs. The applicant requesting a permit must use the State of California Environmental Reporting System and submit the online request within 30 days.

If a building permit is required, California Government Code Section 65850.2 prohibits building departments from issuing a final Certificate of Occupancy to businesses or facilities that handle hazardous materials unless they have submitted and met the requirements of a hazardous materials business plan. The plan contains detailed information on the storage of hazardous materials at regulated facilities and serves to prevent or minimize damage to public health, safety, and the environment from a release or threatened release of a hazardous material. The hazardous materials business plan also provides emergency response personnel with adequate information to help them better prepare and respond to chemical-related incidents at regulated facilities.

San Diego County Emergency Operations Plan

The Operational Area Emergency Operations Plan describes a comprehensive emergency management system that provides for a planned response to ~~disaster~~ situations associated with natural disasters, technological incidents, terrorism, and nuclear-related incidents. It delineates operational concepts ~~related~~ to various emergency situations, identifies components of the Emergency Management Organization, and describes ~~the~~ overall responsibilities for protecting life and property and ensuring the overall well-being of the population. The plan also identifies ~~the~~ sources of outside support which might be provided (through mutual aid and specific statutory authorities) by other jurisdictions, state and federal agencies, and the private sector.

The plan cites authorities and references to support the plan ~~and, which~~ has five objectives:

1. Provide a system for the effective management of emergency situations;
2. Identify lines of authority and relationships;
3. Assign tasks and responsibilities;
4. Ensure adequate maintenance of facilities, services, and resources; and
5. Provide a framework for adequate resources for recovery operations.

County of San Diego Multi-Jurisdictional Hazard Mitigation Plan

The Multi-Jurisdictional Hazard Mitigation Plan includes an overview of the risk-assessment process, identifies hazards present in the jurisdiction, and provides hazard profiles and vulnerability

assessments. The plan also identifies goals, objectives, and actions for each jurisdiction in the County, including all cities and the County unincorporated areas. ~~The~~For the unincorporated portions of the County ~~13 goals have been developed~~ 13 goals for their hazard mitigation plans:

1. Promote disaster-resistant future development.
2. Increase public understanding and support for effective hazard mitigation.
3. Build and support the local capacity and commitment to become less vulnerable to hazards, and
4. Enhance hazard mitigation coordination and communication with federal, state, local, and tribal governments.

The remaining nine goals reduce the potential for damage and loss ~~to~~involving existing assets—particularly people, critical facilities and infrastructure, and County-owned facilities—due to:

5. Dam failure,
6. Earthquake and liquefaction,
7. Coastal storms/erosion/tsunami,
8. Landslides,
9. Floods,
10. Structural fires/wildfires,
11. Extreme weather and drought,
12. Manmade hazards, and
13. Hazardous materials releases.

San Diego County Wildland–Urban Interface Fire Emergency Response Plan

The San Diego County Fire Chiefs' Association and the San Diego County Police Chiefs' and Sheriffs's Association ~~approve~~are responsible for approving the San Diego County Wildland–Urban Interface Fire Emergency Response Plan, which is the County's standard emergency response and evacuation management plan format for wildfire. Staff are encouraged to become familiar with this plan and be prepared to integrate with public safety responders in response to emergencies ~~at this site~~. Park ~~staff~~personnel are urged to develop additional emergency response plans consistent with this document and the plan as well as the means and methods necessary for emergency communications with the public. Staff should consider the evacuation and "trigger point" criteria ~~stated in this plan~~ and determine if additional time ~~is~~will be required to mobilize internal staff and implement this plan. (please see Section 4.20, Wildfire, for a detailed assessment of the San Diego County Wildland–Urban Interface Fire Emergency Response Plan).

County of San Diego Code of Regulatory Ordinances Sections 68.401–68.406, Defensible Space for Fire Protection Ordinance

This ordinance addresses ~~the issues associated with an~~ accumulation of weeds, rubbish, and other materials on ~~a private property found to create~~that creates a fire hazard and could be injurious to the health, safety, and general welfare of the public. ~~The~~Under the ordinance ~~constitutes~~, the presence of such weeds, rubbish, and other materials ~~as is~~ a public nuisance ~~and that~~ requires abatement in

accordance with the provisions of this section. ~~This~~ ordinance is enforced in all ~~County Service Areas~~ county service areas (CSAs) ~~and in the~~ as well as unincorporated areas of the County ~~that are~~ outside a fire protection district. All fire protection districts have a combustible vegetation abatement program, and many have adopted ~~and enforce~~ the County's ordinance.

County of San Diego Code of Regulatory Ordinances Sections 96.1.005 and 96.1.202, Removal of Fire Hazards

The San Diego County Fire ~~Authority~~ Protection District, in partnership with CAL FIRE, the Bureau of Land Management, and the U.S. Forest Service, is responsible for enforcing defensible space inspections. Inspectors from CAL FIRE are responsible for the initial inspection of properties ~~to ensure, ensuring that~~ an adequate defensible space has been created around structures. If violations of the program requirements are noted, inspectors provide a list of required corrective measures and a reasonable timeframe ~~to complete~~ for completing the task. If ~~the~~ violations still exist upon re-inspection, the local fire inspector ~~forwards~~ will forward a complaint to the County for further enforcement action.

County of San Diego Consolidated Fire Code

The County of San Diego, in collaboration with the local fire protection districts, created the first Consolidated Fire Code in 2001; it contains ~~the County and fire protection districts amendments to the California Fire Code~~ CFC. The purpose of consolidation with respect to the adoptive ordinances of the County and local fire districts' ~~adoptive ordinances~~ is to promote consistency in the interpretation and enforcement of the ~~Fire Code for the protection of the~~ CFC and protect public health and safety, ~~which includes~~. This involves permit requirements for the installation, alteration, or repair of ~~new and existing~~ fire-protection systems and penalties for violations of the code. The Consolidated Fire Code provides ~~the~~ minimum requirements for access, water supply and distribution, construction ~~type~~, fire-protection systems, and vegetation management. Additionally, ~~the Fire Code~~ it regulates hazardous material and provides associated measures to ensure that public health and safety are protected from incidents ~~related~~ ing to hazardous substance releases.

County Department of Planning and Land Use Fire Prevention in Project Design Standards

Following the October 2003 wildfires, the County DPR's Department of Planning and Land Use (now Planning and Development Services) incorporated several fire prevention strategies into the discretionary project review process for CEQA projects. One of the more significant changes is the requirement that most discretionary permits (e.g., subdivision and use permits) in WUI areas ~~prepare to include~~ a fire protection plan for review and approval. A fire protection plan is a technical report that considers the topography, geology, combustible vegetation (i.e., fuel types), climatic conditions, and fire history ~~of at~~ the project location. The plan addresses the following (among others) in terms of compliance with applicable codes and regulations: water supply, primary and secondary access, travel time to the nearest fire station, structure setback from property lines, ignition-resistant building features, fire-protection systems and equipment, impacts on existing emergency services, defensible space, and vegetation management.

4.9.3.4 Local

Alpine Fire Protection District Ordinance

The Alpine FPD was formed in 1957 to provide fire protection for the community of Alpine. Its Board of Directors created the Alpine FPD Ordinance (No. 2020-01), which adopted the CFC, including Appendices B, C, H, I, and K; the International Fire Code; and National Fire Protection Association Standards 13, 13-R, and 13-D, as referenced in Chapter 80 of the CFC, together with Alpine FPD amendments. The CFC is adopted for the protection of public health and safety. The Alpine FPD Ordinance (No. 2020-01) includes additions, insertions, deletions, and changes to sections and chapters of the CFC.

Alpine Community Wildfire Protection Plan

The original Alpine Community Wildfire Protection Plan was developed by the Alpine Public Safety Committee, a subcommittee of Supervisor Dianne Jacob's Alpine Revitalization Committee, with guidance and support from the U.S. Forest Service, CAL FIRE, California Department of Transportation, County OES, County Department of Planning and Land Use (now Planning and Development Services, County Sheriff's Department, Alpine FPD, Viejas Fire Department, and Greater Alpine Fire Safe Council. The intent of the plan is to optimize the use of scarce resources (i.e., money, people, equipment) to achieve the greatest overall benefit to the community (Alpine Public Safety Committee 2021). The primary goal is to prioritize projects, as follows:

- Defensible space around structures,
- Defensible space along evacuation routes, and
- Hazardous fuels reductions.

A key element of the planning strategy is to link together existing and future fuel-reduction projects so they can provide contiguous corridors of protection along a perimeter surrounding the Alpine area. The areas being linked together involve defensible space projects for community homes and evacuation routes, natural and/or human-made fuel breaks created through agency efforts, and burned areas. Priority is then given to those areas that can achieve the greatest degree of protection with the limited resources available.

Alpine Community Plan

The *Alpine Community Plan* (County of San Diego 2020) outlines guidelines and policies for development within the community plan area. The policies and recommendations that apply to wildfire risk are as follows:

Safety Policy 3. Encourage development with fire-preventive development practices and fire resistant plant types.

Safety Policy 4. Consider fire hazards in Alpine a serious and significant environmental impact during review of Environmental Impact Reports.

Conservation Policy 13. Encourage the continuation of support for the brush management program in conjunction with other public agencies to reduce wildfire hazards.

4.9.4 Project Impact Analysis

4.9.4.1 Methodology

The project would ~~implement the development of develop~~ Alpine Park and associated trails and ~~the conservation of conserve~~ approximately 73 acres of open space/preserve land. The following ~~section discussion~~ evaluates the impacts associated with hazards and hazardous materials should the project be implemented. ~~Based on the~~ With respect to existing conditions, the analysis assesses the direct and indirect impacts related to hazards and hazardous materials using the thresholds presented below.

4.9.4.2 Thresholds of Significance

Appendix G of the ~~State~~ CEQA Guidelines

Based on guidance provided in Appendix G of the ~~State~~ CEQA Guidelines, the project would result in a significant impact if it would:

1. Create a significant hazard ~~to for~~ the public or the environment through the routine transport, use, or disposal of hazardous materials.
2. Create a significant hazard ~~to for~~ the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.
3. Emit hazardous emissions or ~~handle~~ involve handling hazardous or acutely hazardous materials, substances, or waste within ~~one-quarter~~ 0.25 mile of an existing or proposed school.
4. Be located on a site ~~which that~~ is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, ~~would it~~ create a significant hazard ~~to for~~ the public or the environment.
5. For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport, public use airport, or private airstrip, ~~would the project~~ result in a safety hazard or excessive noise for people residing or working in the project area.
6. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.
7. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.

County of San Diego Guidelines for Determining Significance

The following *County of San Diego Guidelines for Determining Significance for Hazardous Materials and Existing Contamination* (County of San Diego 2007) ~~will~~ guide the evaluation of whether a significant impact related to hazardous substances and existing contamination ~~will~~ would be likely to occur as a result of project implementation. A project will generally be considered to have a significant effect if it proposes any of the ~~following items listed below~~, absent specific evidence to the

contrary. Conversely, if a project does not propose any of the ~~following items~~, it will generally not be considered to have a significant effect related to hazardous substances and existing contamination, absent specific evidence of such an effect.

1. The project is a business, operation, or facility that ~~proposes to~~would handle hazardous substances in excess of the threshold quantities listed in Chapter 6.95 of the H&SC, generate hazardous waste regulated under Chapter 6.5 of the H&SC, and/or store hazardous substances in ~~underground storage tanks~~USTs regulated under Chapter 6.7 of the H&SC and ~~the project will~~therefore would not be able to comply with applicable hazardous substance regulations.
2. The project is a business, operation, or facility that would handle regulated substances that ~~are~~ subject to CalARP Risk Management Plan requirements ~~that and~~, in the event of a release, could adversely affect children's health due to the presence of a school or day-care facility within ~~one-quarter~~0.25 mile of the ~~facility~~project.
3. The project is ~~located on or within one-quarter~~0.25 mile ~~from~~of a site identified in one of the regulatory databases compiled pursuant to Government Code Section 65962.519 or is otherwise known to have been the subject of an investigation regarding a release of hazardous substances and, as a result, ~~the project may~~ result in a significant hazard ~~to~~for the public or the environment.
4. The project proposes structure(s) for human occupancy and/or significant linear excavation within 1,000 feet of an open, abandoned, or closed landfill (excluding burn sites) and, as a result, ~~the project would~~ create a significant hazard ~~to~~for the public or the environment.
5. The project is proposed on or within 250 feet of the boundary of a parcel identified as containing burn ash (from the historic burning of trash) and, as a result, ~~the project would~~ create a significant hazard ~~to~~for the public or the environment.
6. The project is proposed on or within 1,000 feet of a ~~Formerly Used Defense Site~~formerly used defense site and it has been determined that it is probable that munitions or other hazards are located on the site that could represent a significant hazard ~~to~~for the public or the environment.
7. The project could result in human or environmental exposure to soils or groundwater that exceeds U.S. EPA Region 9 Preliminary Remediation Goals, CalEPA California Human Health Screening Levels, or Primary State or Federal Maximum Contaminant Levels for applicable contaminants ~~and the~~; therefore, exposure would represent a hazard ~~to~~for the public or the environment.
8. The project ~~will~~would involve the demolition of commercial, industrial, or residential structures that may contain asbestos-containing materials, lead-based paint, and/or other hazardous materials and, as a result, ~~the project would~~ represent a significant hazard ~~to~~for the public or the environment.

4.9.4.3 Project Impacts and Mitigation Measures

Threshold 1: Implementation of the project would not create a significant hazard ~~to~~for the public or the environment through the routine transport, use, or disposal of hazardous materials.

County Park and Trails

Impact Discussion

Construction

Project construction would involve the routine transport, use, and disposal of hazardous materials, such as solvents, paints, oils, grease, and caulking. Such transport, use, and disposal must comply with applicable regulations, such as those discussed under Section 4.9.3, *Applicable Laws and Regulations*. Although small amounts of hazardous materials would be transported, used, and disposed of during the construction phase, these materials are typically used in construction projects and would not represent the transport, use, and disposal of acutely hazardous materials. In addition, ~~Best Management Practices~~ best management practices (BMPs) would be employed during construction to prevent spills of hazardous materials into the surrounding environment, as required by the project-specific ~~stormwater pollution prevention plan~~ Stormwater Pollution Prevention Plan (SWPPP) to be prepared under the Construction General Permit (Order No. 2009-009-DWQ, NPDES No. CAS000002, as amended by Order 2010-014-DWQ and 2012-06-DWQ). Therefore, potential construction impacts associated with the routine transport, use, or disposal of hazardous materials would be less than significant.

Operation

The project would ~~implement the development of~~ develop Alpine Park and associated trails and ~~the conservation of~~ conserve approximately 73 acres of open space/preserve land. Facilities within Alpine Park would include ~~amenities such as potential~~ multi-use turf areas, a baseball field, an all-wheel ~~park area~~, bike skills area, recreational courts (i.e., for basketball, pickleball, ~~and game table plaza~~), fitness stations, leash-free dog area, restroom facilities, an administrative facility/ranger station, equestrian staging ~~and area with~~ a corral, a nature play area, a community garden, a volunteer pad, picnic areas with shade structures, and picnic tables, a game table plaza, and ~~multi-use~~ trails. Operations associated with the project (i.e., restrooms, ranger station, ~~and~~ administrative facility) would use hazardous chemicals that are currently used for park operations and typical in these types of settings. These could include common materials, such as toners, paints, restroom cleaners, and other maintenance materials. Grounds and landscape maintenance within the project area would use a variety of commercial products that are considered to be hazardous materials, including fuels, cleaners and degreasers, solvents, paints, lubricants, adhesives, sealers, and pesticides/herbicides. These products would not be stored or used in quantities that would result in a significant release. Any spills involving these materials would be small, localized, and cleaned up as they occur. Furthermore, the transport, use, and disposal of hazardous materials would comply with all applicable federal, state, and local regulations. Therefore, potential operational impacts associated with the routine transport, use, or disposal of hazardous materials would be less than significant.

Impact Determination

The project would not result in a significant hazard ~~to~~for the public or the environment through the routine transport, use, or disposal of hazardous materials. Impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Level of Significance After Mitigation

Impacts would be less than significant.

Open Space/Preserve

Impact Discussion

Construction

Project construction would involve the routine transport, use, and disposal of hazardous materials, such as solvents, paints, oils, grease, and caulking. Such transport, use, and disposal must comply with applicable regulations, such as those discussed ~~under~~in Section 4.9.3, *Applicable Laws and Regulations*. Although small amounts of hazardous materials would be transported, used, and disposed of during the construction phase, these materials are typically used in construction projects and would not represent the transport, use, ~~and~~or disposal of acutely hazardous materials. In addition, BMPs would be employed during construction to prevent spills of hazardous materials into the surrounding environment, as required by the project-specific SWPPP to be prepared under the Construction General Permit (Order No. 2009-009-DWQ, NPDES No. CAS000002, as amended by Order 2010-014-DWQ and 2012-06-DWQ). Therefore, potential construction impacts associated with the routine transport, use, or disposal of hazardous materials would be less than significant.

Operation

Operation of the project's open space/preserve portion is not anticipated to require the use of hazardous materials. Therefore, potential operational impacts associated with the routine transport, use, or disposal of hazardous materials would be less than significant.

Impact Determination

The project would not result in a significant hazard ~~to~~for the public or the environment through the routine transport, use, or disposal of hazardous materials. Impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Level of Significance After Mitigation

Impacts would be less than significant.

Threshold 2: Implementation of the project would create a significant hazard ~~to~~for the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

County Park and Trails

Impact Discussion

Construction

As discussed in Section 4.9.2. *Existing Conditions*, a review of the GeoTracker and EnviroStor online databases identified one EnviroStor listing within the project site, High School No. 12, Study Area B, Wright's Field, located at 2480 South Grade Road, in Alpine CA 91901. There are no other listed hazardous materials sites within the project footprint or within a 0.25-mile radius of the project site. A March 20, 2008, letter from DTSC to the Grossmont Union High School District dated ~~March 20, 2008~~, concluded that there were no hazardous material releases or presence of naturally occurring hazardous materials at the project site. However, there was no information in the letter regarding soil testing, and, due to the former agricultural uses present on the project site, there could potentially be residual soil contamination from the historic use of herbicides or pesticides. Ground-disturbing construction activities could potentially result in the release of contaminated soil into the environment (**Impact HAZ-1**). Therefore, construction impacts would be potentially significant.

Operation

Once operational, the project would not be expected to create a significant hazard ~~to~~for the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. As discussed under Threshold 1, the project would use hazardous materials such as toners, paints, restroom cleaners, fuels, cleaners and degreasers, solvents, paints, lubricants, adhesives, sealers, and pesticides/herbicides during operation. ~~Since proper procedures would be adhered to, it is unlikely that these~~such materials would be stored or used in quantities that would result in a ~~significant release of any significance~~. Any spills involving these materials would be small, localized, and cleaned up as they occur. Furthermore, the transport, use, and disposal of hazardous materials would comply with all applicable federal, state, and local regulations, which would reduce the risk of hazardous materials releases. Therefore, operational impacts would be less than significant.

Impact Determination

Impact HAZ-1: Potential Release of Contaminated Soil. Construction of the project would potentially result in the release of contaminated soil into the environment. Impacts would be potentially significant.

Mitigation Measures

MM-HAZ-1: Prepare and Implement a Soil Management Plan. Prior to the commencement of soil-disturbing construction activities, the County will retain a licensed ~~Professional Geologist, Professional Engineering Geologist, or Professional Engineer~~professional geologist, ~~professional engineering geologist, or professional engineer~~ with experience in contaminated

site redevelopment and restoration to prepare and submit a soil and groundwater management plan to the County for review and approval. After the County's review and approval, the County will implement the soil and groundwater management plan, ~~to~~which will include the following:

- A *Site Contamination Characterization Report* (Characterization Report) delineating the vertical and lateral extent and concentration of residual contamination from the site's past uses in areas where soil would be disturbed. The Characterization Report will include a compilation of data, based on a historical records review and ~~from~~ prior reports and investigations, and, where data gaps are found, ~~include~~ new soil and groundwater sampling to characterize the existing vertical and lateral extent and concentration of residual contamination.
- A *Soil Testing and Profiling Plan* (Testing and Profiling Plan) for materials that will be disposed of during construction. ~~Testing will occur for all~~All potential contaminants of concern ~~will be tested~~, including ~~CACCR~~ Title 22 metals, polycyclic aromatic hydrocarbons, volatile organic compounds, herbicides, pesticides, polychlorinated biphenyls, or any other potential contaminants, as specified within the Testing and Profiling Plan. The Testing and Profiling Plan will document compliance with ~~CACCR~~ Title 22 for proper identification and segregation of hazardous and solid waste as needed for acceptance at a CCR Title 22-compliant off-site disposal facility. All excavation activities will be actively monitored by a ~~Registered Environmental Assessor~~registered environmental assessor for the potential presence of contaminated soils and compliance with the Testing and Profiling Plan.
- A *Soil Disposal Plan* (Disposal Plan), which will describe the process for excavation, stockpiling, dewatering, treating, loading, and hauling of soil from the site. This plan will be prepared in accordance with the Testing and Profiling Plan (i.e., in accordance with CCR Title 22, CCR Title 27, DOT Title 40 CFR Part 263), and current industry best practices for the prevention of cross-contamination, spills, or releases. Measures will include, but not be limited to, segregation into separate piles for waste profile analysis based on organic vapor and visual and odor monitoring.
- A *Site Worker Health and Safety Plan* (Safety Plan) to ensure compliance with 29 CFR Part 120, Hazardous Waste Operations and Emergency Response, regulations for site workers at uncontrolled hazardous waste sites. The Safety Plan will be based on the characterization report and ~~the~~ planned site construction activity to ensure that site workers who are potentially exposed to contamination in soil are trained, equipped, and monitored during site activities. ~~The~~Training, equipment, and monitoring activities will ensure that workers are ~~will not be~~ exposed to contaminants above personnel exposure limits established by Table Z, 29 CFR Part 1910.1000. The Safety Plan will be signed by and implemented under the oversight of a ~~California State Certified Industrial Hygienist~~state certified industrial hygienist.

Level of Significance After Mitigation

Impact HAZ-1 would be reduced to less than significant after implementation of **MM-HAZ-1**, which would ensure preparation and implementation of a Soil Management Plan.

Open Space/Preserve

Impact Discussion

Construction and Operation

Because ground-disturbing construction activities are not proposed as part of the project's open space/preserve portion, this project component would not create a significant hazard ~~to~~for the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

Impact Determination

The open space/preserve component would not result in a significant hazard ~~to~~for the public or the environment. Impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Level of Significance After Mitigation

Impacts would be less than significant.

Threshold 3: Implementation of the project would emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

County Park and Trails

Impact Discussion

Construction

Nearby schools include Joan MacQueen Middle School, approximately 0.4-mile west of the project site at 2001 Tavern Rd, ~~in~~Alpine, CA 91901 and Boulder Oaks Elementary School, approximately 0.7-mile west of the project site at 2320 Tavern Rd, ~~Alpine, CA 91901~~. As mentioned under Threshold 1, project construction would involve ~~the~~ routine handling of hazardous materials such as solvents, paints, oils, grease, and caulking. These materials must be handled in compliance with applicable regulations, such as those discussed ~~under~~in Section 3.8.2, *Regulatory Setting*. Small amounts of these materials would be handled during construction; however, these are typical for construction projects and would not include acutely hazardous materials. In addition, BMPs would be employed during construction (e.g., parking and refueling vehicles and equipment in one area, practicing good housekeeping, properly disposing of hazardous waste) to prevent spills of hazardous materials into the surrounding environment. As discussed previously, the project site does not have a history of onsite contamination; however, a Soil Management Plan would be prepared to evaluate potential for contaminated soils on the project site associated with former agricultural uses (**MM-HAZ-1**). Because the Soil Management Plan would ensure proper handling of potentially contaminated soils during construction, and routine handling of hazardous materials would be in compliance with applicable regulations, impacts from emissions or handling of hazardous materials near schools would be less than significant.

Operation

Operations associated with the project (i.e., restrooms, ranger station, ~~and~~ administrative facility) would use hazardous chemicals that are currently used for park operations and typical in these types of settings. These could include common materials, such as toners, paints, restroom cleaners, and other maintenance materials. Grounds and landscape maintenance within the project area would use a variety of commercial products that are considered hazardous materials, including fuels, cleaners and degreasers, solvents, paints, lubricants, adhesives, sealers, and pesticides/herbicides. These products would not be stored or used in quantities that would result in a significant release. Any spills involving these materials would be small, localized, and cleaned up as they occur. Therefore, potential operational impacts associated with emissions or the handling of hazardous materials near schools would be less than significant.

Impact Determination

Impact HAZ-1: Potential Release of Contaminated Soil. Ground-disturbing construction activities could potentially result in impacts from emissions or the handling of hazardous materials near schools. Impacts would be potentially significant.

Mitigation Measures

Implement **MM-HAZ-1**, as described above.

Level of Significance After Mitigation

Impact-HAZ-1 would be reduced to less than significant after implementation of **MM-HAZ-1**, which would ensure the proper handling of potentially contaminated soils during construction ~~and routine~~ as well as the proper handling of hazardous materials near schools.

Open Space/Preserve

Impact Discussion

Construction and Operation

Because ground-disturbing construction activities are not proposed as part of the project's open space/preserve portion, this project component would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

Impact Determination

Impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Level of Significance After Mitigation

Impacts would be less than significant.

Threshold 4: The project would be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would not create a significant hazard ~~to~~for the public or the environment.

County Park and Trails

Impact Discussion

Construction and Operation

As discussed under Threshold 2, a review of the GeoTracker and EnviroStor online databases only identified one EnviroStor listing within the project site, High School No 12, Study Area B, Wrights Field, located at 2480 South Grade Road, in Alpine CA 91901. There are no other listed hazardous materials sites within the project footprint or a 0.25-mile radius of the project site. This site's potential impact to the project is analyzed under Threshold 2. With the implementation of **MM-HAZ-1**, the project site is not anticipated to create a significant hazard ~~to~~for the public or the environment.

Impact Determination

Impact HAZ-1: Potential Release of Contaminated Soil. Impacts would be potentially significant.

Mitigation Measures

Implement **MM-HAZ-1**, as described above.

Level of Significance After Mitigation

Impacts would be less than significant.

Open Space/Preserve

Impact Discussion

Construction and Operation

Because ground-disturbing construction activities are not proposed as part of the open space/preserve portion of the project, this project component is not anticipated to create a significant hazard ~~to~~for the public or the environment.

Impact Determination

Impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Level of Significance After Mitigation

Impacts would be less than significant.

Threshold 5: For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport, public use airport, or private airstrip, the project would not result in a safety hazard or excessive noise for people residing or working in the project area.

County Park and Trails and Open Space/Preserve

Impact Discussion

Construction and Operation

The project is not within an airport land use plan or within 2 miles of a public airport or public use airport (San Diego County Regional Airport Authority 2021). The nearest airport to the project site is On the Rocks Airport —[1CA6], approximately 4.5 miles southeast of the project site (AirNav.com 2021). Therefore, the project is not anticipated to result in a safety hazard or excessive noise due to proximity to an airport, and no impact would occur.

Impact Determination

Impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Level of Significance After Mitigation

Impacts would be less than significant.

Threshold 6: The project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

County Park and Trails and Open Space/Preserve

Impact Discussion

Construction and Operation

South Grade Road serves as a regional route for evacuation traffic and carries significant traffic daily (Rohde and Associates 2020). As discussed in Section 4.17, *Transportation and Circulation*, a transportation impact study (TIS) was prepared by ~~Chen Ryan~~ CR Associates in April 2020 to identify vehicular impacts associated with the operation of the project (~~Chen Ryan~~ CR Associates 2020). The TIS was performed in accordance with the County of San Diego Traffic Impact Guidelines. No significant impacts related to traffic were identified in the TIS. Therefore, the project would not interfere with the operational area emergency plan or the multijurisdictional hazard mitigation plan.

Furthermore, the project would not prohibit subsequent plans from being established or prevent the goals and objectives of existing plans from being carried out. Therefore, the project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, and impacts would be less than significant.

Impact Determination

Impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Level of Significance After Mitigation

Impacts would be less than significant.

Threshold 7: The project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.

County Park and Trails and Open Space/Preserve

Impact Discussion

For additional analysis of wildfire hazards, please see Section 4.20, *Wildfire*. According to CAL FIRE's Fire Hazard Severity Zones in SRA Map, the project site is in a VHFHSZ (CAL FIRE 2007). Rohde and Associates prepared an FEOA on ~~November 3, 2020~~ June 25, 2021, to identify wildfire risks at the project site (Appendix I) (Rohde and Associates 2020~~1~~). The FEOA identified the following site-specific wildfire and ignition risks ~~associated with~~ at the project site:

- Proximity to South Grade Road, a known location of ~~increased~~ with human-related fire ignition factors;
- Adjacency of the site to significant human activity, including homes and ranches;
- Robust public usage of the site for both dispersed and organized recreation;
- Location of the park site with respect to historical major wildfire corridors;
- Heavy fuel concentrations on some County/~~Back-Country Land Trust~~ BCLT lands;
- Current off-road parking and occasional vehicle trespass; and
- Potential increase in demands on local public safety resources as a result of developed park use.

Construction

As noted, the project site is partially within a VHFHSZ, ~~and heat~~. Heat or sparks from construction equipment ~~or~~ and vehicles, as well as the use of flammable materials, have the potential to ignite adjacent vegetation and start a fire, especially during weather events ~~that include~~ with low humidity and high wind speeds that are typically experienced in the summer and fall, but can occur year-round in the San Diego region. County DPR and its contractors would implement standard BMPs ~~intended for the mitigation of potential ignition sources, including~~. Such BMPs include the following:

- All vehicles ~~must~~would be required to carry a fire extinguisher in case of accidental fire ignition.,
- Vehicles ~~cannot~~would not be permitted to park or idle over dry brush., and
- Proper wildfire awareness, reporting, and suppression training will be provided to construction personnel.

Implementation of ~~the~~ standard BMPs would reduce the potential for ignition and increase the ability of on-site workers and staff to control and extinguish a wildfire event. Therefore, construction of the project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.

Operation

Operation of the project could introduce new conditions that could exacerbate wildfire risk at the project site. While development of the project would reduce the fuel load on the project site by developing natural habitat with a built environment, operation of the project would introduce visitors to the project site ~~that who~~ were not previously present. Given the high percentage of wildfires in Southern California that are ignited by human-related causes, this could exacerbate ~~the~~ existing wildfire risks on the site. (please see Section 4.20, Wildfire, for a detailed assessment of the wildfire risk and its management). The measures discussed below would also be in effect.

The project would comply with County Code of Regulatory Ordinances; Title 3, Division 5, Chapter 3, ~~and as well as~~ Appendix H-AIIA of the Uniform Fire Code. Furthermore, County DPR would be required to comply with the Defensible Space for Fire Protection Ordinance (County of San Diego 2011). ~~The at~~ ordinance would require combustible vegetation; dead, dying, or diseased trees; green waste; rubbish; or other flammable materials to be cleared within 30 feet of the property line and within 10 feet of each side of a highway, private road, or driveway in order to maintain defensible space (County of San Diego 2011). The project ~~is~~would also be required to comply with the County of San Diego Fire Service Conditions stipulated by ~~the~~ County Fire Services staff personnel (i.e., County Fire Marshall) upon review and approval of the project. Secondly

Access to the park has been designed in coordination with County DPR, the County Department of Public Works, and County Fire Services personnel to ensure accommodation for large pieces of fire apparatus and horse trailers as they enter and exit. In addition, as part of project operations of the project, signs would be clearly posted containing with park rules and regulations ~~that would be enforced at the park~~clearly posted, in compliance with San Diego County Code of Regulatory Ordinances; Title 4, Public Property, Division 1, Parks and Recreation, Chapter 1, County Parks and Recreation. These rules, which would be enforced by park employees ~~and, would~~ include, but not be limited to, the following:

- Smoking ~~is~~would be prohibited.
- Campfires and open flames ~~are~~would be prohibited. ~~The, and~~ barbeques ~~will~~would be locked on red-flag days. County DPR has procedures for the enforcement of “Open Flame Bans” ~~that open flame bans,” which~~ are initiated by ~~the~~ declaration of a Red Flag Warning. red-flag warning. County DPR would integrate signage and other interpretive stations at key site entrance points, indicating red-flag conditions when announced by fire agencies. When a warning is issued, ~~Region Managers~~region managers would reach out to the field staff and begin the process of shutting down all ~~BBQs~~barbeques by signing and banning/taping them off until the warning is lifted. Additional signage ~~is~~would be posted at park entrances and throughout the park. Park ~~staff~~personnel would patrol the park to enforce the ban.

- No person ~~is~~would be allowed to use, transport, carry, fire, or discharge any fireworks, firearm, weapon, air gun, archery device, slingshot, or explosive of any kind across, in, or into a County park.
- Parking ~~must~~would occur in designated staging areas.

County DPR would prepare a Site Evacuation Plan as part of operational planning for the project. The Site Evacuation Plan would include emergency contact information, evacuation routes and established meeting places, and safety protocols to ensure the safe evacuation of visitors and employees of the park. County DPR would also implement recommendations provided in the FEOA prepared by Rohde and Associates for the project as outlined below.

~~County DPR will also implement the recommendations provided in the FEOA prepared by Rohde and Associates for the project.~~ Because the project would introduce potential ignition sources to a previously undeveloped open space area, fire prevention protocols would be implemented as part of the project. The following fire prevention protocols ~~that, which~~ were recommended in the Rohde and Associates ~~FEOA assessment~~, would be implemented as project design features:

- Facility Fire-Safe Design. County DPR shall design appropriate facility elements of the project and ensure County fire and building code compliance to reduce risk to wildfire risks for users and to the area, including fire. Fire-resistive landscaping would create a fire-safe area where the two dog parks, three soccer fields, and baseball diamond are proposed. In addition, the paved parking lot, basketball and pickleball courts, equestrian area, and other cleared areas would not only provide a buffer that would protect the park from wildfire but also provide a temporary safe refuge area with safe ingress and egress (Rohde and Associates 2021).
- All landscape vegetation on park premises would be consistent with the guidelines of the County Department of Planning and Development Services as well as the County's approved landscaping, fire-resistive landscape plant palette. Generally, these plants would:
 - Grow close to the ground;
 - Have a low sap or resin content;
 - Grow without accumulating dead branches, needles, or leaves;
 - Be easily maintained and pruned;
 - Be drought tolerant;
 - Be responsive to adequate irrigation to maintain a "green" state; and
 - Not present intense thermal outputs during combustion.
- Parking and equestrian areas that can would serve as Temporary Safe Refuge Areas, safe ingress and egress, and a fire-resistive equestrian facility emergency safe routes, providing broad expanses of non-combustible surfaces. These areas would be free of combustible ground cover and cleared of native vegetation whenever possible. Because equestrians would most likely use County facilities as temporary safe refuge sites during wildfires, the equestrian facility would need to be designed to be both substantial and fire resistive so as to provide secure and safe housing for large animals and prevent accidental releases due to animal panicking during wildfires.
- Fuel Modification Program. County DPR shall implement a long-term fuel modification program. This management would be accomplished on a scale needed to alleviate identified fire behavior

potential while limiting environmental impacts from the treatment and offering the highest protection value for the expense and effort. The goals of this fuel modification program would be to reduce wildfire intensity enough to offer reasonable protection to adjacent structural assets, limit landowner liability from wildfire damage to adjoining properties, provide protection for DPR/BCLT site development, and ensure safe public refuge at key sites. Existing fuel modification maintenance includes a 30-foot buffer of vegetation clearance along the frontage of South Grade Road on the County property and a 100-foot buffer of vegetation clearance and defensible space at adjoining properties along the northern boundary of the County-owned parcel, as directed by the Alpine FPD Defensible Space Requirements (Alpine FPD 2022). This document is attached as Appendix L. The County will specifically implement a 100-foot buffer of vegetation clearance that extends from the volunteer pad, an additional 20-foot buffer of vegetation clearance adjoining the 30-foot buffer of vegetation clearance (total of 50-foot buffer clearance) adjacent to the roadside within the proposed park footprint, as well as a 20-foot buffer adjoining the 30-foot buffer approximately 100 feet south of the northeast corner of the County's parcel in order to reduce hazards associated with increased human-related fire ignition factors. The aggregate 50-foot vegetation clearance and 30-foot vegetation clearance also reduce an extension of wildfire from the historical wildfire corridor on the east face of the site.

- The project also shall achieve Zone A—compliance fuel modification around the Alpine Park facility per fire and building code requirements, with the goal of 100% percent fire exclusion from the project site. The objective of landscape replacement in Zone A will be to eliminate the potential for wildfire occurrence through establishment of a fire-resistive landscape around principal park facilities and structures at the minimum distances required by code. This has been designed through the proposed landscape around sports fields and buildings, subject to Alpine Fire Marshal review and approval during the permitting process (Rohde and Associates 2021). Zone B fuel reduction shall occur adjacent to Zone A along property lines, where practical, and around key public facilities such as the parking areas, equestrian staging areas, and similar locations. Fuel modification in Zone B should be designed to achieve fire prevention goals while maintaining viable habitat and preserving ecological values. The objective of fuel treatment in Zone B is to achieve at least a 75 percent reduction in fire-line intensity from a wildfire moving from native fuels into a constructed fuel modification zone (Rhode and Associates 2021). The County will implement a 100-foot fuel reduction area extending from the volunteer pad under Zone A and Zone B compliance.
- Fuel Modification Criteria: A–O in FEOA (Appendix J)
 - Treatment Methods. County DPR shall implement one or more of the recommended treatment method alternatives, including:
 - Mechanical treatment, including mowing or plowing, may be used to establish fuel modification in grass where terrain is within the mechanical limits of equipment to extend parking lot or equestrian staging area clearance for safe refuge.
 - Grazing for grass and lighter fueled sites such as sage scrub in the south half or northwest quarter.
 - Hand treatment by hand crews is recommended for steep sites and sites with heavy fuels such as shrub fuel and steep-sloped areas in the northwest quarter of the combined site.
 - Spot control with herbicides. Herbicides would be used to control undesired weeds or selective vegetation within fuel modification areas.

- Partner Collaboration for Fire Prevention. County DPR shall coordinate with neighboring entities, including ~~BCLT, Greater Alpine Fire Safe Counsel, the Alpine FPD, San Diego County Fire Authority, CAL FIRE FPD, CAL FIRE,~~ County Road Department, and San Diego Gas & Electric, on regional defensible-space initiatives, fuel modification, and structural defense initiatives, including sharing of resources, planning, and costs.
- Comply with the Regional Wildfire and Evacuation Plan (see Section 4.20, *Wildfire*). The San Diego County WUI Fire Emergency Response Plan has been updated for the Alpine ~~South-East~~southeast area as a part of the Rohde and Associates FEOA (Appendix J). This document, which is also approved by the San Diego County Fire Chiefs Association and San Diego County Police Chiefs' and Sheriff's Associations and, is the County standard emergency response and evacuation management plan format for wildfire. County DPR shall implement the project in compliance with the plan.
- Comply with Site-Specific Wildfire and Evacuation Plan. An Alpine Community Park Fire Evacuation Analysis was developed by Chen Ryan Associates (Appendix K) to assess the time required for emergency evacuation from the project site under several scenarios, assuming a wind-driven fire that results in a required evacuation affecting the project site and surrounding community. The traffic evacuation simulations presented within the analysis found that evacuation traffic generated by the project would not significantly increase the average evacuation travel time or result in unsafe evacuation timeframes. Evacuation flow would be able to be effectively managed.

~~Therefore,~~ Implementation of the aforementioned project design features, compliance with applicable ordinances and regulations, and enforcement of County DPR rules and regulations would reduce the potential for the project to expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. Impacts would be less than significant.

Impact Determination

Implementation of the project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. Impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Level of Significance After Mitigation

Impacts would be less than significant.

Threshold 8: The project would not be a business, operation, or facility that ~~proposes to~~ would handle hazardous substances in excess of the threshold quantities listed in Chapter 6.95 of the H&SC, generate hazardous waste regulated under Chapter 6.5 of the H&SC, and/or store hazardous substances in ~~u~~Underground storage tanks regulated under Chapter 6.7 of the H&SC and the project would comply with applicable hazardous substance regulations.

County Park and Trails and Open Space/Preserve

Impact Discussion

As discussed above under Threshold 1, project construction would involve the routine transport, use, and disposal of hazardous materials, such as solvents, paints, oils, grease, and caulking. Potential construction impacts associated with the routine transport, use, or disposal of hazardous materials would be less than significant. Operations associated with the project (i.e., restrooms, ranger station, ~~and~~ administrative facility) would use hazardous chemicals that are currently used for park operations and typical in these types of settings. These products would not be stored or used in quantities that would result in a significant release ~~and potential~~. Potential operational impacts associated with the routine transport, use, or disposal of hazardous materials would be less than significant. The project would not propose a business, operation, or facility that ~~proposes to~~ would handle hazardous substances in excess of the threshold quantities listed in Chapter 6.95 of the H&SC, generate hazardous waste regulated under Chapter 6.5 of the H&SC, and/or store hazardous substances in ~~underground storage tanks~~ USTs regulated under Chapter 6.7 of the H&SC ~~and the~~. The project would comply with applicable hazardous substance regulations.

Impact Determination

Impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Level of Significance After Mitigation

Impacts would be less than significant.

Threshold 9: The project would be a business, operation, or facility that would handle regulated substances subject to CalARP Risk Management Plan requirements that in the event of a release could adversely affect children's health due to the presence of a school or day care within one-quarter mile of the facility.

County Park and Trails and Open Space/Preserve

Impact Discussion

As discussed under Threshold 3, nearby schools include Joan MacQueen Middle School, approximately 0.4 mile west of the project site at 2001 Tavern Road, Alpine, CA 91901; and Boulder Oaks Elementary School, approximately 0.7 mile west of the project site at 2320 Tavern Road, Alpine, CA 91901. Project construction would involve the routine transport, use, and disposal of hazardous materials, such as solvents, paints, oils, grease, and caulking. Operations associated with the project (i.e., restrooms, ranger station, ~~and~~ administrative facility) would use hazardous chemicals that are currently used for park operations and typical in these types of settings. ~~It is unlikely that these~~ These materials would be stored or used in quantities that would not result in a significant release. Any spills involving these materials would be small, localized, and cleaned up as they occur. As discussed under Threshold 2, ground-disturbing construction activities could potentially result in ~~the~~ a release of contaminated soil into the environment (**Impact HAZ-1**). Therefore, construction impacts would be potentially significant.

Impact Determination

Impact HAZ-1: Potential Release of Contaminated Soil. Ground-disturbing construction activities could potentially result in impacts from emissions or handling of hazardous materials near schools. Impacts would be potentially significant.

Mitigation Measures

Implement **MM-HAZ-1**, as described above.

Level of Significance After Mitigation

Impact-HAZ-1 would be reduced to a ~~less-than-significant level~~ after implementation of **MM-HAZ-1**, which would ensure the proper handling of potentially contaminated soils during construction ~~and routine~~ as well as the proper handling of hazardous materials near schools.

Threshold 10: The project would be located on or within one-quarter mile ~~from~~ of a site identified in one of the regulatory databases compiled pursuant to Government Code Section 65962.519 or ~~is~~ otherwise known to have been the subject of a release of hazardous substances and, as a result, the project may result in a significant hazard ~~to~~for the public or the environment.

County Park and Trails and Open Space/Preserve

Impact Discussion

As discussed under Thresholds 2 and 4, a review of the GeoTracker and EnviroStor online databases only identified one EnviroStor listing within the project site, High School No 12, Study Area B, Wrights Field, at 2480 South Grade Road, Alpine CA 91901. There are no other listed hazardous materials sites within the project footprint or a 0.25-mile radius ~~off~~from the project site. This site's potential impact pm the project is analyzed under Threshold 2. With ~~the~~ implementation of **MM-HAZ-1**, the project site is not anticipated to create a significant hazard ~~to~~for the public or the environment.

Impact Determination

Impact HAZ-1: Potential Release of Contaminated Soil. Impacts would be potentially significant.

Mitigation Measures

Implement **MM-HAZ-1**, as described above.

Level of Significance After Mitigation

Impacts would be less than significant.

Threshold 11: The project does not propose structure(s) for human occupancy and/or significant linear excavation within 1,000 feet of an open, abandoned, or closed landfill (excluding burn sites) and, as a result, the project would not create a significant hazard ~~to~~for the public or the environment.

County Park and Trails and Open Space/Preserve

Impact Discussion

The project does not propose structure(s) for human occupancy and/or significant linear excavation within 1,000 feet of an open, abandoned, or closed landfill (excluding burn sites) ~~and~~. Therefore, it would therefore not create a significant hazard ~~to~~for the public or the environment.

Impact Determination

There would be no impact.

Mitigation Measures

No mitigation is required.

Level of Significance After Mitigation

There would be no impact.

Threshold 12: The project is not proposed on or within 250 feet of the boundary of a parcel identified as containing burn ash (from the historic burning of trash) and, as a result, the project would not create a significant hazard ~~to~~for the public or the environment.

County Park and Trails and Open Space/Preserve**Impact Discussion**

The project site is not on or within 250 feet of a parcel identified as containing burn ash (from the historic burning of trash) ~~and~~. Therefore, it would ~~therefore~~ not create a significant hazard ~~to~~for the public or the environment.

Impact Determination

There would be no impact.

Mitigation Measures

No mitigation is required.

Level of Significance After Mitigation

There would be no impact.

Threshold 13: The project would not be proposed on or within 1,000 feet of a ~~Formerly Used Defense Site~~formerly used defense site and munitions or other hazards are not located on site that could represent a significant hazard ~~to~~for the public or the environment.

County Park and Trails and Open Space/Preserve**Impact Discussion**

The project site is not on or within 1,000 feet of a ~~Formerly Used Defense Site~~ and formerly used defense site. Therefore, it would ~~therefore~~ not represent a significant hazard ~~to~~for the public or the environment.

Impact Determination

There would be no impact.

Mitigation Measures

No mitigation is required.

Level of Significance After Mitigation

There would be no impact.

Threshold 14: The project could result in human or environmental exposure to soils or groundwater that exceeds U.S. EPA Region 9 Preliminary Remediation Goals, CalEPA California Human Health Screening Levels, or Primary State or Federal Maximum Contaminant Levels for applicable contaminants and the exposure would represent a hazard to the public or the environment.

County Park and Trails and Open Space/Preserve**Impact Discussion**

As discussed under Threshold 2, ground-disturbing construction activities could potentially result in the release of contaminated soil into the environment (**Impact HAZ-1**), thereby resulting in human or environmental exposure to contaminated soil. Soil at the project site could potentially exceed U.S. EPA Region 9 Preliminary Remediation Goals, CalEPA California Human Health Screening Levels, or Primary State or Federal Maximum Contaminant Levels for applicable contaminants. Therefore, construction impacts would be potentially significant.

Impact Determination

Impact HAZ-1: Potential Release of Contaminated Soil. Impacts would be potentially significant.

Mitigation Measures

Implement **MM-HAZ-1**, as described above.

Level of Significance After Mitigation

Impact HAZ-1 would be reduced to a less-than-significant level after implementation of **MM-HAZ-1**, which would ensure preparation and implementation of a Soil Management Plan.

Threshold 15: The project would not involve the demolition of commercial, industrial, or residential structures that may contain asbestos-containing materials, lead-based paint, and/or other hazardous materials and, as a result, the project would not represent a significant hazard ~~to~~for the public or the environment.

County Park and Trails and Open Space/Preserve**Impact Discussion**

The project would not involve the demolition of commercial, industrial, or residential structures.

Impact Determination

There would be no impact.

Mitigation Measures

No mitigation is required.

Level of Significance After Mitigation

There would be no impact.

4.9.5 Summary of Significant Impacts

Table 4.9-1. Summary of Significant Hazards and Hazardous Materials Impacts and Mitigation Measures

Summary of Potentially Significant Impact(s)	Summary of Mitigation Measure(s)	Level of Significance After Mitigation	Rationale for Finding After Mitigation
Impact HAZ-1: Potential Release of Contaminated Soil	MM-HAZ-1: Prepare and Implement a Soil Management Plan	Less than Significant	MM-HAZ-1 would ensure proper identification, handling, and disposal of contaminated soils if they are encountered on the project site.

4.20.1 Overview

This section describes the existing wildfire conditions of the project site and vicinity, identifies associated regulatory requirements, evaluates potential impacts, and identifies mitigation measures related to implementation of the project. Potential wildfire impacts resulting from construction and operation of the project were evaluated based on a review of existing resources, data, and applicable laws, regulations, guidelines, and standards. This section focuses on the effects of the project related to wildfire risk. Fire protection services for the project are addressed in Section 4.15, *Public Services*.

4.20.2 Existing Conditions

The following section provides sections below provide a brief background of the for wildfire risk in the state and the region, the existing conditions on the project site, and the official fire hazard designations of the project site.

4.20.2.1 Regional and Local Wildfire Risk

Wildfire, as defined in California Public Resources Code (PRC) Sections 4103 and 4104, is any uncontrolled fire spreading through vegetative fuels that threatens to destroy life, property, or resources. Wildfires can occur in undeveloped areas and spread to urban areas where the landscape and structures are not designed and maintained to be ignition resistant. Several factors, including climate, wind patterns, native vegetation, topography, and development patterns, make the unincorporated county susceptible to wildfires. A vast amount of the county's undeveloped lands support natural habitats such as grasslands, sage scrub, chaparral, and some coniferous forest. Extended droughts, characteristic of the region's Mediterranean climate, result in large areas of dry vegetation that provide fuel for wildland fires. In addition, climate change has contributed to soil dryness. This dry vegetation is especially vulnerable to wildfire in areas with high winds. Steep hillsides and varied topography within portions of San Diego County also contribute to the risk of wildland fires.

Fires can be ignited naturally or by human-related causes. In Southern California, over 95% of fires are started by people (County of San Diego 2010). The potential for wildland fires represents a hazard where development is adjacent to open space/preserve lands or close to wildland fuels or designated fire severity zones. The wildland-urban interface Wildland Urban Interface (WUI) is the area where structures and other human developments meet or intermingle with undeveloped wildlands or vegetative fuels. A WUI is defined by the California Department of Forestry and Fire Protection (CAL FIRE) as a buffer around areas of residential density greater with more than 0.05 dwelling unit per acre and. The WUI is divided into a Defense Zone (the area up to 0.25 mile from the developed area) and a Threat Zone (from 0.25 to 1.5 miles from developed areas) (County of San Diego 2020a). The WUI is composed of communities that border wildlands or are intermixed with wildlands and where the minimum density exceeds one structure per 40 acres. WUI communities

are created when the following conditions occur: (1) structures are built at densities greater than one unit per 40 acres, (2) the percentage of native vegetation is less than 50%, (3) the area is more than 75% vegetated, and (4) the area is within 1.5 miles of an area ~~greater~~larger than a census block (1,325 acres).

The WUI creates an environment in which fire can move readily between structural and vegetation fuels, ~~and fires.~~ Fires that occur in WUI areas may affect natural resources, life, and property. Approximately 60,072 acres of the Alpine Community Plan Area are within ~~the~~ WUI, which represents 88% of the community (County of San Diego 2020a).

The community of Alpine is at the foothills of the Peninsular Range ~~of mountains~~, which runs through Southern California and into Baja Mexico ~~in~~along a northwest to southeast trajectory. This topography allows Alpine to experience strong easterly Santa Ana winds. These winds most commonly reach their peak between September and March; however, Santa Ana winds have been experienced in every month of the year. Santa Ana wind conditions occur when cooler and drier air masses form an area of high pressure in the Great Basin region of the Pacific Southwest. This causes a pressure gradient to occur with low-pressure air masses along the Southern California coastline. ~~The phenomenon~~With this phenomenon, winds are compressed and funneled through narrow drainages formed by the mountain ranges. If the pressure gradient is large, this compression combines with gravity to cause the wind to accelerate downhill to potential hurricane speeds. The nearby Laguna and Viejas Mountains, the Sweetwater River drainage, and other significant topography within the Peninsular Range influence both winds and wildfire events, creating a historical wildfire corridor. This phenomenon also causes high wind speeds and warm, dry air that wicks moisture from the native flora, causing fuel ~~moistures~~moisture levels to lower to a critical condition. This fire hazard condition is often referred to as “Red Flag” levels. ~~red flag” levels.~~ In addition to the Santa Ana wind threat, the predominant weather pattern for the Alpine area between March and September is onshore diurnal winds, often with a western trajectory and averaging near 20 miles per hour. Under these typical conditions, Alpine can experience high daily temperatures and low relative humidity (Rohde and Associates 2021).

The 2018 West Fire burned approximately 500 acres in the Alpine community, destroying 56 structures. The West Fire affected the project site directly. The fire line ~~to contain~~for containing this ~~fire event~~ was ~~physically placed in the location of~~on the project site’s northern boundary (Rohde and Associates 20201).

The project site is primarily flat grasslands ~~and~~, with coastal sage; ~~in the northern segment of the project boundary.~~ The adjacent Wright’s Field Preserve ~~contains some~~is contoured and more sloping. Some areas are dominated by grass, but ~~is mainly~~most areas are covered primarily with a mix of sage scrub and chaparral, along with some oak woodlands. The project site and Wright’s Field Preserve are on contiguous parcels ~~and form,~~ forming a common wildfire compartment for the purposes of analyzing wildfire risk. They are subject to impacts from a single wildfire event and pose a wildfire risk to the adjacent WUI in the community of Alpine (Rohde and Associates 20201). The occurrence of Santa Ana winds plus the dry climate and existing natural habitat of the project site put it at high risk for wildfire.

4.20.3 Fire Hazard Designations

CAL FIRE has mapped areas of significant fire hazards in the county through its Fire and Resource Assessment Program. CAL FIRE defines and maps Fire Hazard Severity Zones (FHSZs) to identify the potential fire hazard severity expected in different areas within the state, as required by PRC Sections 4201–4205. ~~FHSZs are determined~~ An FHSZ determination is based on an area's vegetation, topography (slope), weather (including winds), crown fire potential, and ember production and movement potential. FHSZs include the classifications Very High, High, or Moderate in areas where the state is responsible for fire protection (i.e., State Responsibility Areas [SRAs]) (CAL FIRE 2007). The majority of San Diego County is included in an SRA for fire prevention and suppression. However, some areas, such as national forests, are within Federal Responsibility Areas, which are under the responsibility of the U.S. Forest Service for wildfire protection. FHSZs ~~also~~ include the classification Very High Fire Hazard Severity Zone (VHFHSZ) in areas where local agencies are responsible for fire protection (i.e., Local Responsibility Areas) (CAL FIRE 2009). In San Diego County, local fire protection is provided by fire protection districts (FPDs) and ~~County Service Areas~~ county service areas in unincorporated areas, ~~and by~~ along with city fire departments and joint powers agreements within city boundaries.

The project site and surrounding area are within an area identified as a VHFHSZ in an SRA (Figure 4.20-1).

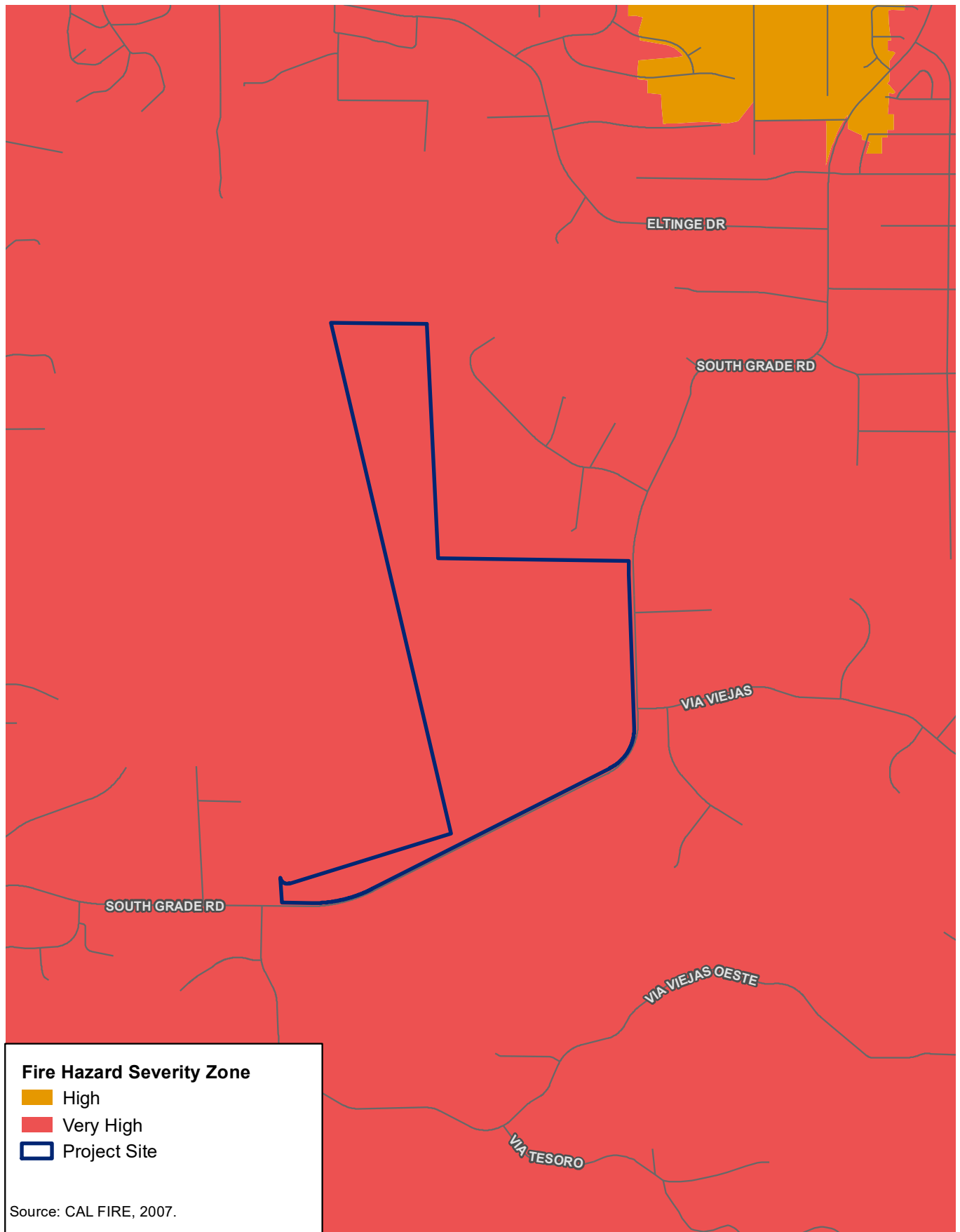
4.20.3.1 Fire and Emergency Response

The County of San Diego (County) Office of Emergency Services (OES) coordinates the overall County response to disasters. OES notifies appropriate agencies when a disaster occurs, coordinates with responding agencies, ensures that resources are available and mobilized, plans for the response to and recovery from disasters, and develops preparedness materials for the public. OES acts as the staff to the Unified Disaster Council (UDC), which was established under a joint powers agreement among all 18 incorporated cities and the County, coordinating plans and programs countywide to ensure the protection of life and property.

Fire protection services for the project site are provided by the Alpine FPD, which covers 27.5 square miles (County of San Diego 2011a). ~~The Alpine FPD Station 17 is at 1364 Tavern Road, approximately 2.7 miles from the project site. Station 17 has a Type-1 Advanced Life Support/Paramedic Structure Fire Engine, advanced-life-support/paramedic structure fire engine. It also cross staffs a Type-3 Wildland Fire Engine, wildland fire engine, has a Chief Officer, chief officer, and houses a Paramedic Ambulance, paramedic ambulance 24 hours every day. Alpine FPD also has a joint agreement for immediate services with neighboring fire agencies in the Central Zone of San Diego County and for immediate services; it also maintains dispatch services through the Heartland regional dispatch center. Wildland fire protection for the immediate area of Alpine is provided to in SRA wildlands by the CAL FIRE San Diego Unit. CAL FIRE, as the contract provider of services for the San Diego County FPD, also provides structural fire and rescue services to the unincorporated areas of San Diego County as the contract provider of services for the San Diego County Fire Authority. Some areas in the community of Alpine are covered by both agencies, where with fire protection for Local Responsibility Area structural services are provided by Alpine FPD and wildland fire protection is provided to the SRA by CAL FIRE. For an event requiring~~ Nearby federal lands within the Cleveland National Forest are under the jurisdiction of the U.S. Department of Agriculture, Forest Service (USFS). The USFS, which is responsible for wildland fire protection on the National Forest,

maintains a fire station in the community of Alpine. Automatic aid agreements exist between CAL FIRE, USFS, and Alpine FPD, ensuring a response from both, the two agencies would respond concurrently in a coordinated manner. the closest appropriate resource to a reported emergency, regardless of jurisdictional boundary.

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0 500 1,000
Feet
1 in = 1,000 ft

Figure 4.20-1
Very High Fire Hazard Severity Zone (VHFHSZ)
Alpine Park Project

4.20.4 Wildfire Hazards

As referenced within Section 4.9, *Hazards and Hazardous Materials*, a Fire and Emergency Operation Assessment (FEOA) was prepared to identify specific wildfire risks at the project site (Rohde and Associates 2021); the following information in this section is from the FEOA (Appendix J). The FEOA noted that, historically, the project site has been subject to wildfires. In 2018, the West Fire affected the proposed Alpine Park site directly. The fire line for containing the West Fire was on the proposed park's northern boundary. In 1970, the Laguna Fire also burned much of the proposed park area. The FEOA identified site-specific wildfire and ignition risks associated with the project site and recommended fire prevention measures, as stated below:

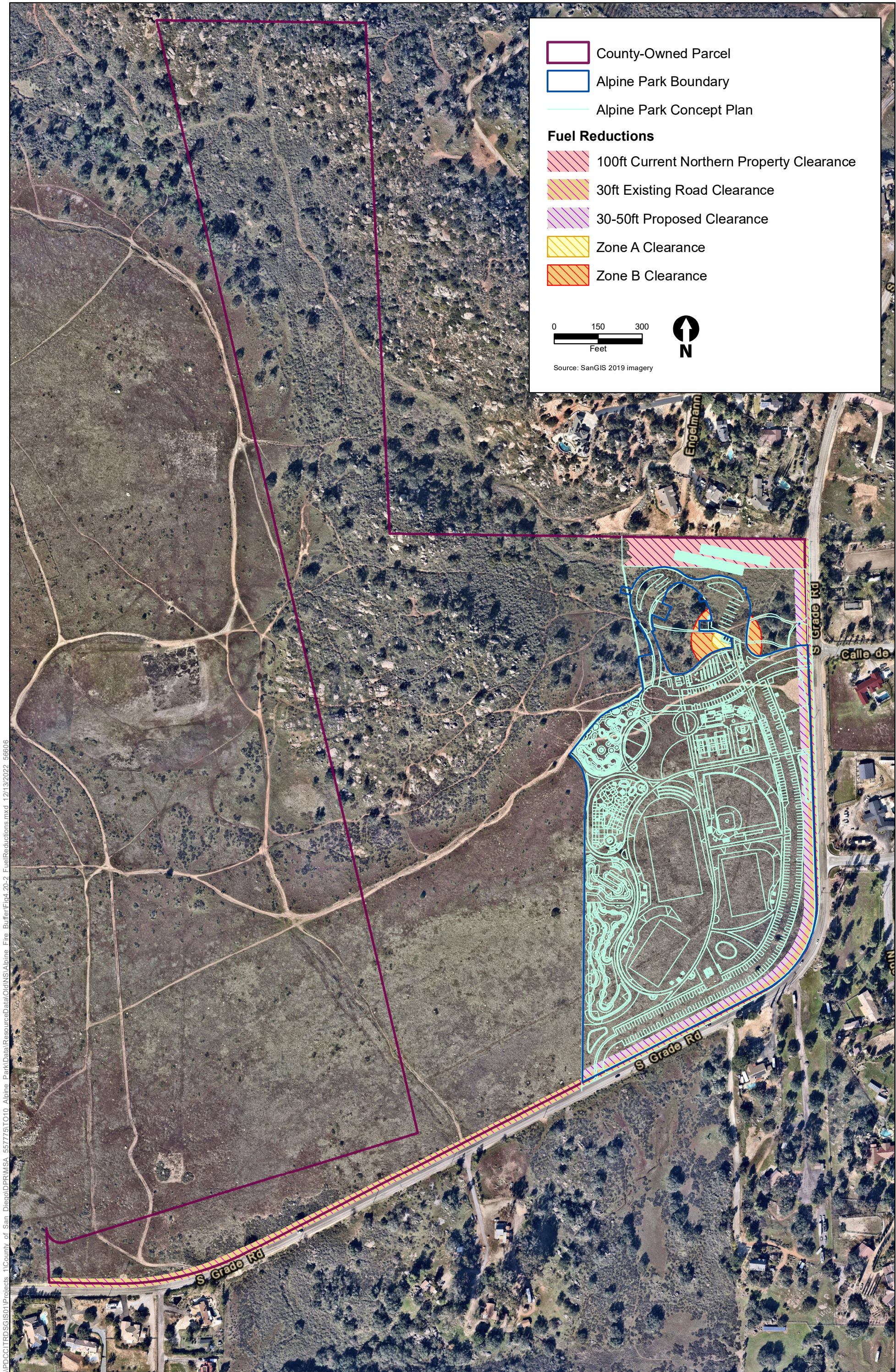
- *Proximity to South Grade Road, a known location with increased human-related fire ignition factors.* The location of South Grade Road, on the southeast boundary of the land for Alpine Park, poses elevated ignition risks because of passing vehicles—specifically, vehicle exhaust, hot materials discarded from vehicles, vehicle accidents, off-road parking, dragging tow chains, or related hazards. However, the County will continue to maintain an existing 30-foot buffer where vegetation has been cleared adjacent to the roadside along the County property, which has been historically cleared and is required by the Alpine Fire Protection District, and is not part of this project. As part of the proposed project, the County would create an additional 20-foot buffer adjacent to the existing 30-foot buffer along the park footprint, for a total of 50 feet. As part of the proposed project, the County would also create an additional 20-foot buffer adjacent to the existing 30-foot buffer approximately 100 feet south of the northeast corner of the County's parcel.
- *Adjacency of the site to significant human activity, including homes and ranches.* The proximity of homes and ranches to County Department of Parks and Recreation (DPR) and Back Country Land Trust (BCLT) lands poses risks from human-related fire ignition factors, extending from these properties to the site. For this risk, the County will continue to maintain a historically cleared and existing 100-foot buffer where vegetation has been cleared where there are adjoining properties along the northern boundary of the County-owned parcel, which is required by the Alpine Fire Protection District and is not part of this project. As part of the project, the County would create a 100-foot buffer that would extend from the volunteer pad.
- *Robust public usage of the site for both dispersed and organized recreation.* Human use could increase on the site with development of the park, thereby increasing the associated human-related fire ignition factors. The historical unregulated public use of these lands would now be regulated and managed by the County DPR. This includes the introduction of new and enhanced fire prevention measures. Development of the sports fields, associated parking, public facilities, and support buildings would include landscaping to isolate these facilities from the surrounding wildland, a requirement of the fire and building codes. This would reduce wildfire exposure and ignition risks. The County DPR would coordinate with the utility service provider to consider undergrounding the adjacent electric utility services. Additional fuel reduction measures would also be implemented to further isolate these uses for public safety and ignition resistance
- *Location of the park site with respect to historical major wildfire corridors.* Historical wildfire corridors that experience both Santa Ana winds and onshore wind-driven conditions are within proximity of the project site. Past wildfires have traversed this corridor. However, fuel modification and the placement of developed park features would aid in containing wildfire

movement within this corridor. A fire line was established in the past within the Wright's Field site for containment purposes.

- Heavy fuel concentrations on some County/BCLT lands. Heavier fuels could present extreme burning characteristics during critical fire weather, including high thermal outputs, rapid rates of spread, and spotting. Because heavy fuel is concentrated primarily on BCLT lands, the County would coordinate with BCLT to alleviate wildfire risks and prevent fire from either entering the preserve from adjacent property or moving through preserve lands and affecting private properties.
- Current off-road parking and occasional vehicle trespass. Trespassing does occasionally occur, although vehicle access is currently blocked by light fencing. Park development is expected to strengthen the vehicle control barriers and provide improved fire-safe parking.
- Potential increase in demand for local public safety resources due to the developed park use. New demands on public safety resources resulting from the development of new park facilities is not expected to place unmitigable demands on local fire or law enforcement services. For this risk, a full review of the existing response capability and potential development impacts was conducted, as discussed in the FEOA. In addition, the project would employ an on-site staff that would provide new security for park facilities upon build-out.

4.20.4.1 Fuel Reductions and Modifications

As discussed in Section 4.20.4, Wildfire Hazards, and shown in Figure 4.20-2, existing and proposed long-term fuel reductions and fuel modifications implemented throughout the County property. Fuel reductions and modifications, which would include vegetation clearance, would be implemented to reduce wildfire intensity, thereby offering reasonable protection for adjacent structural assets, limiting landowner liability associated with wildfire damage to adjoining properties, providing protection for DPR/BCLT site development, and ensuring safe public refuge at key sites. Existing and proposed fuel reductions would occur along the northern perimeter of the Alpine Park facility and adjoining properties, as well as along the roadside, to reduce hazards associated with increases in human-related fire ignition factors. The roadside fuel clearance also reduces any extension of wildfire from the historical wildfire corridor on the east face of the site.



\\P0001TRDSCIS01\Projects_1\County of San Diego\PRMISA 567775\TO10 Alpine Park\Data\ResourceData\Old\INS\Alpine Fire Buffer\Fig4.20-2 FuelReductions.mxd 12/13/2022 56606



Figure 4.20-2
Fuel Reductions
Alpine County Park Project Environmental Impact Report

~~4.20.44~~4.20.5 Applicable Laws and Regulations

~~4.20.4.14~~4.20.5.1 Federal

International Fire Code

The International Fire Code (IFC), created by the International Code Council, is the primary means for authorizing and enforcing procedures and mechanisms to ensure the safe handling and storage of ~~any substances~~substances that may pose a threat to public health and safety. The IFC regulates the use, handling, and storage requirements for hazardous materials at fixed facilities. The IFC and the International Building Code use a hazard classification system to determine what protective measures are required to protect fire and life safety. These measures may include construction standards, separations from property lines, and specialized equipment. To ensure that these safety measures are met, the IFC employs a permit system based on hazard classification. The IFC is updated every 3 years.

~~International Wildland-Urban Interface~~WUI Code

The International WUI Code is published by the International Code Council and is a model code addressing wildfire issues.

Federal Wildland Fire Management Policy

The 1995 Federal Wildland Fire Management Report produced the first ~~single~~-comprehensive federal fire policy for the Departments of the Interior and Agriculture. That review was stimulated by the 1994 fire season with its 34 fatalities and growing recognition of fire problems caused by fuel accumulation. The resulting 1995 ~~Federal Fire Policy~~policy recognized, for the first time, the essential role of fire in maintaining natural systems. In the aftermath of the escape of the Cerro Grande ~~Prescribed Fire~~prescribed fire in May of 2000, the Secretaries of the Interior and Agriculture requested a review of the 1995 ~~Federal Fire Policy and its implementation~~policy and updated ~~its policies~~it in the 2001 ~~Review and Update~~Update of the 1995 Federal Wildland Fire Management Policy. *Guidance for Implementation of Federal Wildland Fire Management Policy* (U.S. Forest Service et al. 2009) ~~outlines~~provides the following guidelines that should be used to ~~provide~~ensure consistent implementation of federal wildland fire policy:

- Firefighter and public safety is the first priority in every fire management activity.;
- The role of wildland fire as an essential ecological process and natural change agent will be incorporated into the planning process.;
- Fire management plans, programs, and activities support land and resource management plans and their implementation.;
- Sound risk management is a foundation for all fire management activities.;
- Fire management programs and activities are economically viable, based ~~upon~~ the values to be protected, costs, and land and resource management objectives.;
- Fire management plans and activities are based ~~upon~~ the best available science.;

- Fire management plans and activities incorporate public health and environmental quality considerations;
- Federal, state, tribal, local, interagency, and international coordination and cooperation are essential; and
- Standardization of policies and procedures among federal agencies is an ongoing objective.

~~4.20.4.24.20.5.2~~ 4.20.5.2 State

California Emergency Services Act

The California Emergency Services Act was adopted to establish the state's roles and responsibilities during human-caused or natural emergencies that result in disaster conditions of disaster and/or extreme peril to life, property, or resources of the state. This act is intended to protect health and safety by preserving the lives and property of the people of the state.

California Natural Disaster Assistance Act

The California Natural Disaster Assistance Act provides financial aid to local agencies to assist in the permanent restoration of public real property, other than facilities used solely for recreational purposes, when such real property has been damaged or destroyed by a natural disaster. The act is activated after a local declaration of emergency and the California Emergency Management Agency gives concurrence with the local declaration, or after the Governor issues a proclamation of a state emergency. Once the act is activated, the local government is eligible for certain types of assistance, depending on the specific declaration or proclamation issued.

California Department of Forestry and Fire Protection

CAL FIRE protects the people of California from fires, responds to emergencies, and protects and enhances forest, range, and watershed values providing social, economic, and environmental benefits to rural and urban citizens. CAL FIRE's firefighters, fire engines, and aircraft respond to an average of more than 5,400 wildland fires each year (CAL FIRE 2016). The Office of the State Fire Marshal supports CAL FIRE's mission by focusing on fire prevention. It provides support through a wide variety of fire safety responsibilities including by regulating buildings in which people live, congregate, or are confined; controlling substances and products that may, in and of themselves or by their misuse, cause injuries, death, and destruction by fire; providing statewide direction for fire prevention in wildland areas; regulating hazardous liquid pipelines; reviewing regulations and building standards; and providing training and education in fire protection methods and responsibilities.

2018 Strategic Fire Plan for California

The 2018 Strategic Fire Plan for California (2018 Plan) is a cooperative effort between the State Board of Forestry and Fire Protection and CAL FIRE (State Board of Forestry and Fire Protection and CAL FIRE 2018).

In 2018, the Board of Forestry and Fire Protection adopted a new strategic fire plan to ~~update and~~ address fire concerns in California. The board has adopted fire plans since the 1930s and periodically updates them to reflect current and anticipated needs. Over time, as the environmental,

social, and economic landscape of California's wildlands ~~has changed~~, the board has evolved the Strategic Fire Plan to ~~better~~ respond to these changes and to provide CAL FIRE with appropriate guidance "for adequate statewide fire protection of state responsibility areas" (PRC Section 4130). The 2018 Plan calls for a natural environment that is more fire resilient, buildings and infrastructure that are more fire resistant, and a society that is more aware of and responsive to the benefits and threats of wildland fire, all achieved through local, state, federal, tribal, and private partnerships.

The goals that are critical to achieving the 2018 Plan's vision revolve around fire prevention, natural resource management, and fire suppression efforts, as broadly construed. Major components are:

- Improve the availability and use of consistent, shared information on hazard and risk assessment;
- Promote the role of local planning processes, including general plans, new development, and existing developments, and recognize individual landowner/homeowner responsibilities;
- Foster a shared vision among communities and the multiple fire protection jurisdictions, including county-based plans and community-based plans such as Community Wildfire Protection Plans;
- Increase awareness and actions to improve the fire resistance of at-risk man-made assets ~~at risk~~ and the fire resilience of wildland environments through natural resource management;
- Integrate implementation of fire and vegetative fuels management practices consistent with the priorities of landowners or managers;
- Determine and seek the needed level of resources for fire prevention, natural resource management, fire suppression, and related services; and
- Implement needed assessments and actions for post-fire protection and recovery.

California Public Resources Code

Fire Hazard Severity Zones – Public Resources Code Sections 4201–4204

In 1965, PRC Sections 4201–4204 directed CAL FIRE to map areas ~~of~~with significant fire hazards, based on fuels, terrain, weather, and other relevant factors. These FHSZs define the application of various mitigation strategies to reduce risks associated with wildland fires.

Very High Fire Hazard Severity Zones – Government Code Sections 51175–51189

In 1992, Government Code Sections 51175–51189 established the classification for very high fire hazard severity based on fuel loading, terrain, weather, and other relevant factors identified by CAL FIRE as major causes of wildfire spread and ~~on the severity of fire hazard that is expected to prevail~~ in those areas. The code established ~~the~~ requirements for those that maintain an occupied dwelling within a designated VHFHSZ. The VHFHSZs define the application of mitigation measures to reduce risk associated with uncontrolled wildfires and require that the measures be taken. Local agencies designate the VHFHSZs within their jurisdictions as required by CAL FIRE.

Senate Bill 1241

In 2012, Senate Bill 1241 added Section 66474.02 to Title 7, Division 2, of the California Government Code, commonly known as the Subdivision Map Act. The statute prohibits subdivision of parcels

designated very high fire hazard, or that are in an SRA, unless certain findings are made prior to approval of the tentative map. The statute requires that a city or county planning commission make three new findings regarding fire hazard safety before approving a subdivision proposal. The three findings are, in brief: (1) the design and location of the subdivision and its lots are consistent with defensible space regulations found in PRC Sections 4290–4291; (2) structural fire protection services will be available for the subdivision through a publicly funded entity; and (3) ingress and egress road standards for fire equipment are met per any applicable local ordinance and PRC Section 4290.

Fire Safe Development Regulations

In 1991, the Fire Safe Development Regulations were developed to implement PRC Section 4290 and stipulate minimum requirements for building construction in SRAs. These regulations address ingress and egress (e.g., road widths, turnouts), building and street sign visibility, emergency water standards, and fuel modification. In June 2012, CAL FIRE and the Board of Forestry and Fire Protection formed a workgroup to revise the Fire Safe Development Regulations. Changes to the regulations were effective January 1, 2016. This workgroup was re-engaged in 2017 to align the update timeline for the Fire Safe Development Regulations with the triennial California Fire Code (CFC) cycle. The workgroup has been reviewing the existing regulations based on feedback received from the 2016 updates to reduce inconsistencies and improve clarity. These changes are anticipated to be effective with the 2020 CFC on January 1, 2020.

California Building Code and Fire Code

The California Code of Regulations, Title 24, is a compilation of building standards, including fire safety standards for residential and commercial buildings. The California Building Code (CBC) standards serve as the basis for the design and construction of buildings in California. The CFC is a component of the CBC. Typical fire safety requirements of the CFC include the installation of sprinklers in all high-rise buildings; the establishment of fire-resistance standards for fire doors, building materials, and particular types of construction; and the clearance of debris and vegetation within a prescribed distance from occupied structures in wildfire hazard areas. The CFC applies to all occupancies in California, except where more stringent standards have been adopted by local agencies.

The CFC includes requirements for building construction and vegetation management within areas designated as WUI areas. In such areas, all new buildings must comply with the CBC, which defines construction requirements to reduce wildfire exposure. In addition, buildings within the WUI must comply with California laws and regulations that require maintenance of a “defensible space” of 100 feet from structures (PRC § 4291; CCR § 1299.03). In particular, CBC Chapter 7A applies to building materials, systems, and/or assemblies used in the exterior construction of new buildings within a WUI. Chapter 7A establishes minimum standards for the protection of life and property by increasing the ability of a building in an FHSZ and an SRA or WUI to resist the intrusion of flames or burning embers projected by a vegetation fire. Therefore, the CFC contributes to a systematic reduction in conflagration losses. New buildings in an FHSZ or any WUI, as designated by an enforcing agency, constructed after the application date shall comply with the provisions of Chapter 7A. County DPR will be responsible for the review of structural development within the park for fire code compliance.

State Fire Regulations

State fire regulations are set forth in Sections 13000 et seq. of the California Health and Safety Code, which include regulations concerning building standards (as also set forth in the CBC), fire protection and notification systems, fire protection devices such as extinguishers and smoke alarms, high-rise building and childcare facility standards, and fire suppression training. The State Fire Marshal enforces these regulations and building standards in all state-owned buildings, state-occupied buildings, and state institutions throughout California.

4.20.5.3 Local/Regional

County of San Diego Multi-Jurisdictional Hazard Mitigation Plan

The federal Disaster Mitigation Act of 2000 requires all local governments to create a disaster plan in order to qualify for hazard mitigation funding. The Multi-Jurisdictional Hazard Mitigation Plan (County of San Diego 2017) is a countywide plan that identifies risks and ways to minimize damage by natural and human-made disasters. The plan is a comprehensive resource document that serves many purposes, such as enhancing public awareness, creating a decision tool for management, promoting compliance with state and federal program requirements, enhancing local policies for hazard mitigation capability, and providing inter-jurisdictional coordination.

The Multi-Jurisdictional Hazard Mitigation Plan addresses wildfire risks within the San Diego region by assessing the exposure to wildfire hazard of populations in the different jurisdictions within the region. The assessment includes considers the exposure of the population, residential buildings, and commercial buildings, as well as the exposure of critical facilities and infrastructure, such as airports, bridges, and electric power facilities. The plan then outlines goals, objectives, and actions for each jurisdiction within the San Diego region. Goals related to wildfire typically include reducing the possibility of damage and loss due to structural/wildfire. Objectives and actions related to wildfire typically include measures such as updating fire and evacuation plans, maintaining vegetation management policies, and maintaining an adequate emergency response capability.

County of San Diego Operational Area County Emergency Operations Plan

The Office of Emergency Services OES implements the Operational Area Emergency Operations Plan in collaboration with the Unified San Diego County Emergency Services Organization (Unified San Diego County Emergency Services Organization and County of San Diego 2018). The plan is for use used by the County and all of the cities within the county to respond to major emergencies and disasters. It describes the roles and responsibilities of all County departments (including many city departments), and the relationship among the County and its departments, and the jurisdictions within the county. The plan contains 16 annexes, detailing specific emergency operations for different emergency situations.

San Diego County WUI Fire Emergency Response Plan

The San Diego County Fire Chiefs Association and the San Diego County Police Chiefs' and Sheriff's Association approve the San Diego County WUI Fire Emergency Response Plan, which is the County's standard emergency response and evacuation management plan format for wildfire. The San Diego County WUI Fire Emergency Response Plan was updated for the Alpine southeast area in the Rohde and Associates FEOA (2021). This document is attached to the FEOA report as Appendix I.

The plan provides critical information regarding risk assessment, hazards, emergency resource necessities, and tactical evacuation. The tactical plan offers an evacuation plan and recommended strategies or tactics for combating wildfire. County DPR shall implement the project in compliance with the plan, as outlined in this chapter. Staff will become familiar with the plan and be prepared to integrate with public safety responders in response to emergencies at the site. Furthermore, staff members should consider the evacuation and “trigger point” criteria in the plan and determine if additional time will be required to mobilize internal staff members and implement the plan. Park personnel are urged to develop additional emergency response plans consistent with this document and the means and methods necessary for emergency communications with the public.

County of San Diego Municipal Code

The County of San Diego Municipal Code Title 9, Division 6, Fire Protection (County Fire Code), adopts the CFC with modifications or amendments specific to the local climatic, geological, or topographical conditions of the county. The County Fire Code provides definitions, requirements, and procedures for permits; and regulations for building, repair, maintenance, demolition, and equipment use of buildings and structures and new or existing fire protection systems. The County Fire Code authorizes the County Fire Warden ~~as to be~~ the party responsible for enforcement of the County Fire Code in the unincorporated areas of the county that are outside an FPD. In an FPD, the district fire chief or his/her duly authorized representative is responsible for enforcement.

County of San Diego Code of Regulatory Ordinances Sections 68.401–68.406, Defensible Space for Fire Protection Ordinance

This ordinance addresses issues associated with an accumulation of weeds, rubbish, and other materials on private property that creates a fire hazard and could be injurious to the health, safety, and general welfare of the public. Under the ordinance, the presence of such weeds, rubbish, and other materials is a public nuisance that requires abatement in accordance with the provisions of Sections 68.401–68.406. The ordinance is enforced in all county service areas as well as unincorporated areas of the county that are outside a fire protection district. All fire protection districts have a combustible vegetation abatement program, and many have adopted the County’s ordinance.

County of San Diego Code of Regulatory Ordinances Sections 96.1.005 and 96.1.202, Removal of Fire Hazards

The San Diego County Fire Protection District, in partnership with CAL FIRE, the Bureau of Land Management, and USFS, is responsible for enforcing defensible space inspections. Inspectors from CAL FIRE are responsible for the initial inspection of properties, ensuring that an adequate defensible space has been created around structures. If violations of program requirements are noted, inspectors provide a list of required corrective measures and a reasonable timeframe for completing the task. If violations still exist upon reinspection, the local fire inspector will forward a complaint to the County for further enforcement action.

County of San Diego Consolidated Fire Code

The County of San Diego, in collaboration with the local fire protection districts, created the first Consolidated Fire Code in 2001; it contains County and fire protection district amendments to the CFC. The purpose of consolidation with respect to the adoptive ordinances of the County and local fire districts is to promote consistency in the interpretation and enforcement of the CFC and protect

public health and safety. This involves permit requirements for the installation, alteration, or repair of fire-protection systems and penalties for violations of the code. The Consolidated Fire Code provides minimum requirements for access, water supply and distribution, construction, fire-protection systems, and vegetation management. In addition, it regulates hazardous material and provides associated measures to ensure that public health and safety are protected from incidents related to hazardous substance releases.

County Department of Planning and Land Use Fire Prevention in Project Design Standards

Following the October 2003 wildfires, the County Department of Planning and Land Use (now Planning & Development Services) incorporated several fire prevention strategies into the discretionary project review process for California Environmental Quality Act (CEQA) projects. One of the more significant changes is the requirement that calls for most discretionary permits (e.g., subdivision and use permits) in WUI areas to include a fire protection plan for review and approval. A fire protection plan is a technical report that considers the topography, geology, combustible vegetation (i.e., fuel types), climatic conditions, and fire history at the project location. The plan addresses the following items (among others) in terms of compliance with applicable codes and regulations: water supply, primary and secondary access, travel time to the nearest fire station, structure setback from property lines, ignition-resistant building features, fire-protection systems and equipment, impacts on existing emergency services, defensible space, and vegetation management.

County of San Diego General Plan

The ~~County of San Diego County~~ General Plan (County of San Diego 2011b) Safety Element contains policies that are applicable to wildfire in the Safety Element, as follows:

Policy S-3.1. Defensible Development. Require development to be located, designed, and constructed to provide adequate defensibility and minimize the risk of structural loss and life safety resulting from wildland fires.

Policy S-3.2. Development in Hillside and Canyons. Require development located near ridgelines, top of slopes, saddles, or other areas where the terrain or topography affect its susceptibility to wildfires to be located and designed to account for topography and reduce the increased risk from fires.

Policy S-3.3. Minimize Flammable Vegetation. Site and design development to minimize the likelihood of a wildfire spreading to structures by minimizing pockets or peninsulas, or islands of flammable vegetation within a development.

Policy S-3.4. Service Availability. Plan for development where fire and emergency services are available or planned.

Policy S-3.5. Access Roads. Require development to provide additional access roads when necessary to provide for safe access of emergency equipment and civilian evacuation concurrently.

Policy S-3.6. Fire Protection Measures. Ensure that development located within fire threat areas implement measures that reduce the risk of structural and human loss due to wildfire.

Policy S-3.7. Fire-Resistant Construction. Require all new, remodeled, or rebuilt structures to meet current ignition-resistance construction codes and establish and enforce reasonable and prudent standards that support retrofitting of existing structures in high fire-threat areas.

Policy S-6.3. Funding Fire Protection Services. Require development to contribute its fair share towards funding the provision of appropriate fire and emergency medical services as determined necessary to adequately serve the project.

Policy S-6.4. Fire Protection Services for Development. Require that new development demonstrate that fire services can be provided that meets the minimum travel times identified in Table S-1 (Travel Time Standards from Closest Fire Station).

~~4.20.4.34.20.5.4~~ **Local**

Alpine Fire Protection District Ordinance

The Alpine FPD was formed in 1957 to provide fire protection for the community of Alpine. Its Board of Directors created the Alpine FPD Ordinance (No. 2020-01), which adopted the CFC, including Appendices B, C, H, I, and K; the International Fire Code; and National Fire Protection Association Standards 13, 13-R, and 13-D, as referenced in Chapter 80 of the CFC, together with Alpine FPD amendments. The CFC is adopted for the protection of public health and safety. The Alpine FPD Ordinance (most recently adopted edition) includes additions, insertions, deletions, and changes to sections and chapters of the CFC.

Alpine Community Wildfire Protection Plan

The original Alpine Community Wildfire Protection Plan was developed by the Alpine Public Safety Committee, a subcommittee of Supervisor Dianne Jacob's Alpine Revitalization Committee, with guidance and support from the U.S. Forest Service, CAL FIRE, California Department of Transportation, County Office of Emergency Services ~~OES~~, County Department of Planning and Land Use (now Planning & Development Services), County Sheriff's Department, Alpine FPD, Viejas Fire Department, and Greater Alpine Fire Safe Council. The intent of the plan is to optimize the use of scarce resources (i.e., money, people, and equipment) to achieve the greatest overall benefit to the community (Alpine Public Safety Committee 2021). The primary goal is to prioritize projects, as follows:

- Defensible space around structures,
- Defensible space along evacuation routes, and
- Hazardous fuels reductions.

A key element of the planning strategy is to link together existing and future fuel-reduction projects so they can provide contiguous corridors of protection along a perimeter surrounding the Alpine area. The areas being linked together ~~include~~ involve defensible space projects for community homes and evacuation routes, natural and/or human-made fuel breaks created through agency efforts, and burned areas. Priority is then given to those areas that can achieve the greatest degree of protection with the limited resources available.

Alpine Community Plan

The *Alpine Community Plan* (County of San Diego 2020b) outlines guidelines and policies for development within the community plan area. The policies and recommendations that apply to wildfire risk are as follows:

Safety Policy 3. Encourage development with fire-preventive development practices and fire resistant plant types.

Safety Policy 4. Consider fire hazards in Alpine a serious and significant environmental impact during review of Environmental Impact Reports.

Conservation Policy 13. Encourage the continuation of support for the brush management program in conjunction with other public agencies to reduce wildfire hazards.

~~4.20.5.4.20.5.4~~ **4.20.6 Project Impact Analysis**

~~4.20.5.14.20.5.14~~ **4.20.6.1 Methodology**

Analysis of potential impacts related to wildfire was based on the ability of fire personnel to adequately serve the existing and future population of the project site, as well as federal, state, and local regulations regarding wildfire.

~~4.20.5.24.20.5.24~~ **4.20.6.2 Thresholds of Significance**

Appendix G of the ~~State~~ CEQA Guidelines

The following significance criteria are based on Appendix G of the ~~State~~ CEQA Guidelines and provide the basis for determining the significance of impacts associated with wildfire risk and wildfire-related hazards. Impacts are considered significant if the project would be in or near SRAs or lands classified as VHFHSZs, and would result in any of the following:

1. Substantially impair an adopted emergency response plan or emergency evacuation plan.
2. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks ~~of~~, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.
3. Require the installation or maintenance of associated infrastructure ~~{, such as roads, fuel breaks, emergency water sources, power lines, or other utilities}~~, that may exacerbate fire risks ~~or that may~~ result in temporary or ongoing impacts on the environment.
4. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

County of San Diego Guidelines for Determining Significance

The ~~following~~ *County of San Diego Guidelines for Determining Significance for Wildland Fire and Fire Protection* (County of San Diego 2010) ~~provide guidance for evaluating~~, guide the evaluation of adverse environmental effects that a proposed project may have from wildland fire. The ~~guidance~~ document ~~addresses~~ includes wildfire-related ~~State CEQA Guidelines~~ Appendix G threshold questions addressed in other sections of this EIR, including Threshold 2 in Section 4.9, *Hazards and Hazardous Materials*; Threshold 1 in Section 4.15, *Public Services*; Threshold 4 in Section 4.17, *Transportation and Circulation*; and Threshold 2 in Section 4.19, *Utilities and Service Systems*. Please refer to these listed sections to see the applicable analysis related to these thresholds.

~~4.20.5.34.20.6.3~~ Project Impacts and Mitigation Measures

Threshold 1: Implementation of the project would not substantially impair an adopted emergency response plan or emergency evacuation plan.

County Park and Trails and Open Space/Preserve

Impact Discussion

The Operational Area Emergency Operations Plan is used by unincorporated county areas and all of the cities within the county to respond to major emergencies and disasters. The plan establishes roles and responsibilities for the County departments and the jurisdictions and outlines the emergency operations for the response to different possible emergency situations. The plan indicates that specific evacuation routes would be determined ~~based on~~ according to the locations and extent of the incident and ~~would~~ include as many predesignated transportation routes as possible. According to Annex Q, Evacuation, primary evacuation routes identified in the plan consist of the major interstates, highways, and prime arterials within San Diego County (Unified San Diego County Emergency Services Organization and County of San Diego 2018). Conflict could occur with an adopted emergency response plan or emergency evacuation plan if the project ~~prevents the were to prevent~~ to prevent safe evacuation ~~in the case of~~ during an emergency, or otherwise prevents the safe and timely management of an emergency situation.

Construction

Construction would occur in one phase over 16 months and is anticipated to begin in fall 2022. Construction equipment would include tractors, excavators, backhoes, a water truck, a drill rig, a bobcat, a forklift, rollers, a rubber tire loader, wheel tractor scrapers, an air compressor, a generator set, a crane, and a concrete truck. Construction activities would occur between 7 a.m. and 7 p.m., in compliance with County of San Diego Noise Ordinance. Construction staging activities would occur on the project site. Construction may result in temporarily partially blocked travel lanes along South Grade Road due to the use of large construction equipment, construction material deliveries, or construction of project features adjacent to South Grade Road. These temporary lane closures could delay or obstruct the movement of emergency vehicles along South Grade Road. However, when construction interrupts the normal function of a roadway, a Traffic Control Permit ~~must~~ would be obtained from DPW. County DPR or its contractors would be responsible for obtaining the Traffic Control Permit, which requires the installation and maintenance of appropriate traffic controls, in accordance with a traffic control plan. The traffic control methods used to maintain a safe flow of traffic ~~flow~~ could include barriers, signs, ~~and~~ or flags. Implementation of the traffic control plan would ensure the safe passage of emergency vehicles in the public right-of-way. Additionally, construction activities and the traffic control plan would not prevent emergency vehicles from reaching the project site. County Fire Services staff (i.e., County Fire Marshall) review all proposed projects to ensure onsite access is accessible for emergency vehicles and onsite utilities are ~~sufficient~~ adequate for emergency response. Therefore, the project would be submitted to the County Fire Marshall for review and approval. In addition, the project would comply with the applicable requirements set forth by the County of San Diego Multi-Jurisdictional Hazard Mitigation Plan and the Operational Area Emergency Operations Plan during an emergency.

Operation

Operation of the project would include passive and active recreational facilities and would introduce new staff and visitors to the project site, which currently is undeveloped. ~~County DPR is preparing a Site Evacuation Plan as part of the project that outlines the evacuation routes~~ Main access to be used by visitors and staff within the Alpine Park site in the event of an onsite or offsite emergency situation. The Site Evacuation Plan only addresses evacuation within the boundaries of the project site; once visitors leave the park, evacuation would be under the jurisdiction of the Unified provided on the east side of the property at a new four-way stop-controlled intersection at South Grade Road and Calle de Compadres. A secondary entrance would be constructed at the south end of the park as a driveway into and out of the parking lot. The project would not include any roadway improvements to South Grad Road, beyond constructing a decomposed granite pathway in the existing right-of-way adjacent to the park. The bike lanes would act as a by-pass in an emergency situation. Staff members would become familiar with the San Diego County WUI Fire Emergency Services Organization, Alpine FPD, and other responsible agencies. Neither implementation of the Site Evacuation Plan nor the project as a whole would result in structures or activities that would substantially obstruct or interfere with emergency vehicles or impair emergency Response Plan for the Alpine southeast area and be prepared to integrate with public safety responders in response or evacuation plans.

~~Based on the evaluation provided to emergencies at this site. Please refer to Appendix K for the Alpine Community Park Fire Evacuation Analysis prepared by Rohde and Associates, given the proximity of Alpine FPD Station 17, Chen Ryan Associates (August 2022). This analysis assessed the time required for evacuation from the project site under several scenarios (e.g. a wind-driven fire services could respond to an emergency situation at that results in a required evacuation, affecting the project site in and surrounding community).~~

The traffic evacuation analysis presented in the Alpine Park Fire Evacuation Plan shows the vehicle travel times required under 5 various evacuation events. Nine scenarios were considered. For a conservative scenario, the analysis assumes that all the households, businesses, and vehicles would leave together once an evacuation order is issued. Specifically, the evacuation analysis assumes that up to 240 vehicles would evacuate from the project site. This assumption represents full occupancy of the project site. The analysis also assumes that up to 4,029 vehicles and 4,432 vehicles would evacuate the surrounding land uses under the existing and cumulative scenarios, respectively. Key points from the analysis are provided below. Detailed results and discussions are provided under the respective sections of the analysis provided in Appendix K.

- It would take up to 2 hours and 31 minutes with initial to evacuate existing land uses via South Grade Road and Alpine Boulevard (Scenario 1). If the two-way left-turn lane (TWLTL) along Alpine Boulevard is used as an evacuation lane, then the time is reduced to 1 hour and 33 minutes (Scenario 2).
- Evacuating project traffic only (Scenario 3) would take up to 31 minutes.
- Evacuating all existing land uses and project traffic via South Grade Road and Alpine Boulevard would take up to 2 hours and 40 minutes (Scenario 4). If the TWLTL along Alpine Boulevard is used as an evacuation lane, then the time is reduced to 1 hour and 41 minutes (Scenario 5). Thus, the project increases the total evacuation time by 9 minutes and 8 minutes, respectively.
- Under the cumulative scenario, it would take up to 2 hours and 41 minutes to evacuate the cumulative land uses via South Grade Road and Alpine Boulevard (Scenario 6). If the TWLTL

along Alpine Boulevard is used as an evacuation lane, then the time is reduced to 1 hour and 44 minutes (Scenario 7).

- Evacuating all cumulative land uses and the project via South Grade Road and Alpine Boulevard would take up to 2 hours and 53 minutes (Scenario 4). If the TWLTL along Alpine Boulevard is used as an evacuation lane, then the time is reduced to 1 hour and 50 minutes (Scenario 5). Thus, the project increases the total evacuation time by 12 minutes and 6 minutes, respectively.

The project proposes several features that would enhance evacuation operations; these are not reflected in the evacuation scenarios and average evacuation times. These features include the existing and proposed fuel modification zones within the project site as well as the fuel modification area along the project's frontage (see Figure-4.20-2). In addition, temporary areas for safe refuge would be provided. Because the project would provide a sizable area that would be ignition resistant, emulating urbanized areas where wildfire spread can be halted, emergency managers may halt evacuations at the project site at any point to move higher-priority traffic. The project may also serve as a temporary evacuation point for evacuees from other areas, given its design as a fire-resistant zone.

Neither CEQA nor the County has numerical time standards for determining whether an evacuation timeframe is appropriate. Public safety, not time, is generally the guiding consideration for evaluating impacts related to emergency evacuation. The County considers a project's impact on evacuation significant if it impairs or physically interferes with implementation of an adopted emergency response or evacuation plan or exposes people or structures to a significant risk of loss, injury, or death from wildland fires.

The evacuation scenarios presented in the analysis found that evacuation traffic generated by the project would not increase average evacuation travel times significantly or result in unsafe evacuation timeframes. The flow of evacuation traffic would be effectively managed. In addition, structural fire, rescue, and emergency medical services in the Local Responsibility Area are provided by Alpine FPD, which staffs its fire stations with personnel from a number of fire service agencies in the Alpine region.

Table 4.15-1, Fire Protection Facilities in the Project Vicinity, in Section 4.15, *Public Services*, indicates the locations and types of fire resources that are available for emergency response. Alpine FPD Station 17 is 2.7 miles away from the project site. Fire service resources at Station 17 are available to the community in less than 5 minutes for an initial response and within 15 minutes for most multi-unit responses, which these would be facilitated by the Heartland Dispatch Center and surrounding cooperating fire agencies. (Rohde and Associates 2021). Additionally, Rohde and Associates concluded that operation of the project would result in less than one emergency response call per day on average, which was estimated based on the number of daily park users at estimated peak visitation. Alpine FPD Station 17 currently conducts one to three service calls per day with substantial capacity for additional service calls.

Therefore, the project would not increase demand on existing emergency response services such that it would impair an adopted emergency response plan or emergency evacuation plan.

Impact Determination

The project would not substantially impair an adopted emergency response plan or emergency evacuation plan. Impacts would be less than significant.

Mitigation Measures

Mitigation is not required.

Level of Significance After Mitigation

Impacts would be less than significant.

Threshold 2: Implementation of the project would not due to slope, prevailing winds, and other factors, exacerbate wildfire risks of, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.

County Park and Trails and Open Space/Preserve

Impact Discussion

The project is in an area that, due to the climate, common Santa Ana wind conditions, and topography, is prone to wildfire risk. The project site is identified as a VHFHSZ and has burned during wildland fire events before. The project site slopes to the south, with the more substantial slopes on the northern end of the project site. The highest elevation is approximately 2,030 feet at the northern site boundary and the lowest is approximately 1,970 feet at the southern boundary.

Construction

As noted, the project site is partially within a VHFHSZ, and heat or sparks from construction equipment or vehicles, as well as the use of flammable materials, have the potential to ignite adjacent vegetation and start a fire, especially during weather events that include low humidity and high wind speeds that are typically experienced in the summer and fall, but can occur year-round in the San Diego region. County DPR and its contractors would implement standard best management practices (BMPs) intended for the mitigation of potential ignition sources, including:

- All vehicles ~~must~~would be required to carry a fire extinguisher in case of accidental fire ignition.
- Vehicles ~~cannot~~would not be permitted to park or idle over dry brush, and
- Proper wildfire awareness, reporting, and suppression training will be provided to construction personnel.

Implementation of ~~the~~ standard BMPs would reduce the potential for ignition and increase the ability of ~~onsite~~on-site workers and staff to control and extinguish a wildfire event. Therefore, construction of the project would not exacerbate the conditions and wildfire risk on site, thereby exposing people to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.

Operation

Operation of the project could introduce new conditions that could exacerbate wildfire risk at the project site. While development of the project would reduce the fuel load on the project site by developing natural habitat with built environment, operation of the project would introduce visitors to the project site that were not previously present. Given the high percentage of wildfires in

Southern California that are ignited by human-related causes, this could exacerbate the existing wildfire risks on site.

The project would comply with County Code of Regulatory Ordinances; Title 3, Division 5, Chapter 3, and Appendix II-A of the Uniform Fire Code. ~~Furthermore,~~ County DPR would be required to comply with the Defensible Space for Fire Protection Ordinance (2011). The ordinance requires combustible vegetation; dead, dying, or diseased trees; green waste; rubbish; or other flammable materials to be cleared within 30 feet of the property line and within 10 feet of each side of a highway, private road, or driveway in order to maintain defensible space (County of San Diego 2011c). The project is also required to comply with the County of San Diego Fire Service Conditions stipulated by ~~the County Fire Services staff~~ personnel (i.e., County Fire Marshall) upon review and approval of the project.

Secondly

Access to the park has been designed in coordination with County DPR, the County Department of Public Works, and County Fire Services personnel to ensure accommodation for large pieces of fire apparatus and horse trailers as they enter and exit. In addition, as part of project operations of the project, signs would be clearly posted containing with park rules and regulations that would be enforced at the park clearly posted, in compliance with San Diego County Code of Regulatory Ordinances; Title 4, Public Property, Division 1, Parks and Recreation, Chapter 1, County Parks and Recreation. These rules, which would be enforced by park employees and, would include, but not be limited to, the following:

- Smoking ~~is~~ would be prohibited.
- Campfires and open flames ~~are~~ would be prohibited. ~~The, and~~ barbeques ~~will~~ would be locked on red-flag days. County DPR has procedures for the enforcement of “Open Flame Bans” ~~that open flame bans,”~~ which are initiated by ~~the~~ declaration of a Red Flag Warning-red flag warning. County DPR would integrate signage and other interpretive stations at key site entrance points, indicating red-flag conditions when announced by fire agencies. When a warning is issued, ~~Region Managers~~ region managers would reach out to ~~the~~ field staff and begin the process of shutting down all ~~BBQs~~ barbeques by signing and banning/taping them off until the warning is lifted. Additional signage ~~is~~ would be posted at park entrances and throughout the park. Park ~~staff~~ personnel would patrol the park to enforce the ban.
- No person ~~is~~ would be allowed to use, transport, carry, fire, or discharge any fireworks, firearm, weapon, air gun, archery device, slingshot, or explosive of any kind across, in, or into a County park.
- Parking ~~must~~ would occur in designated staging areas.

County DPR would prepare a Site Evacuation Plan as part of operational planning for the project. The Site Evacuation Plan would include emergency contact information, evacuation routes and established meeting places, and safety protocols to ensure the safe evacuation of visitors and employees of the park. County DPR would also implement the recommendations provided in the FEOA prepared by Rohde and Associates for the project, as outlined below.

~~County DPR will also implement the recommendations provided in the Fire and Emergency Operational Assessment prepared by Rohde and Associates for the project.~~ Because the project would introduce potential ignition sources to a previously undeveloped open space area, fire prevention protocols would be implemented as part of the project. The following fire prevention

protocols ~~that, which~~ were recommended in the Rohde and Associates assessment, would be implemented as project design features:

- Facility Fire-Safe Design. County DPR shall design appropriate facility elements of the project and ensure County fire and building code compliance to reduce risk to wildfire risks for users and to the area, including fire. Fire-resistive approved landscaping, would create a fire-safe area where the two dog parks, three soccer fields, and baseball diamond are proposed. In addition, the paved parking lot, basketball and pickleball courts, equestrian area, and other cleared areas would not only provide a buffer that can serve as Temporary Safe Refuge Areas, would protect the park from wildfire but also provide a temporary safe refuge area with safe ingress and egress, and a fire-resistive equestrian facility. (Rohde and Associates 2021).
- All landscape vegetation on park premises would be consistent with the guidelines of the County Department of Planning & Development Services as well as the County's approved fire-resistive landscape plant palette. Generally, these plants would:
 - Grow close to the ground;
 - Have a low sap or resin content;
 - Grow without accumulating dead branches, needles, or leaves;
 - Be easily maintained and pruned;
 - Be drought tolerant;
 - Be responsive to adequate irrigation to maintain a "green" state; and
 - Not present intense thermal outputs during combustion.
- Parking and equestrian areas would serve as emergency safe routes, providing broad expanses of non-combustible surfaces. These areas would be free of combustible ground cover and cleared of native vegetation whenever possible. Fuel modification within adjacent native vegetation may be used in coordination with development in these areas when necessary to achieve the minimum recommended fuel clearance widths. Because equestrians would most likely use County facilities as temporary safe refuge sites during wildfires, the equestrian facility would need to be designed to be both substantial and fire resistive so as to provide secure and safe housing for large animals and prevent accidental releases due to animal panicking during wildfires.

Fuel Modification Program. County DPR shall implement a long-term fuel modification program. This management would be accomplished on a scale needed to alleviate identified fire behavior potential while limiting environmental impacts from the treatment and offering the highest protection value for the expense and effort. The goals of this fuel modification program would be to reduce wildfire intensity enough to offer reasonable protection to adjacent structural assets, limit landowner liability from wildfire damage to adjoining properties, provide protection for DPR/BCLT site development, and ensure safe public refuge at key sites. Existing fuel modification maintenance includes a 30-foot buffer of vegetation clearance along the northern frontage of South Grade Road of the County property and a 100-foot buffer of vegetation clearance and defensible space at adjoining properties along the boundary of the County-owned parcel, as directed by the Alpine FPD Defensible Space Requirements (Alpine FPD 2022). This document is attached as Appendix L. The County will specifically implement a 100-foot buffer of vegetation clearance that extends from the volunteer pad, an additional 20-foot buffer of

vegetation clearance adjoining the 30-foot buffer of vegetation clearance (total of 50-foot buffer clearance) adjacent to the roadside within the proposed park footprint, as well as a 20-foot buffer adjoining the 30-foot buffer approximately 100 feet south of the northeast corner of the County's parcel in order to reduce hazards associated with increased human-related fire ignition factors. The aggregate 50-foot vegetation clearance and 30-foot vegetation clearance also reduce an extension of wildfire from the historical wildfire corridor on the east face of the site.

- The project also shall achieve Zone A—compliance fuel modification around the Alpine Park facility per fire and building code requirements, with the goal of 100% percent fire exclusion from the project site. The objective of landscape replacement in Zone A will be to eliminate the potential for wildfire occurrence through establishment of a fire-resistive landscape around principal park facilities and structures at the minimum distances required by code. This has been designed through the proposed landscape around sports fields and buildings, subject to Alpine Fire Marshal review and approval during the permitting process (Rohde and Associates 2021). Zone B fuel reduction shall occur adjacent to Zone A along property lines, where practical, and around key public facilities such as the parking areas, equestrian staging areas, and similar locations. Fuel modification in Zone B should be designed to achieve fire prevention goals while maintaining viable habitat and preserving ecological values. The objective of fuel treatment in Zone B is to achieve at least a 75 percent reduction in fire-line intensity from a wildfire moving from native fuels into a constructed fuel modification zone (Rhode and Associates 2021). The County will implement a 100-foot fuel reduction area extending from the volunteer pad under Zone A and Zone B compliance.
- Fuel Modification Criteria: A–O in FEOA (Appendix J)
 - Treatment Methods. County DPR shall implement one or more of the recommended treatment method alternatives, including:
 - Mechanical treatment, including mowing or plowing, may be used to establish fuel modification in grass where terrain is within the mechanical limits of equipment to extend parking lot or equestrian staging area clearance for safe refuge.
 - Grazing for grass and lighter fueled sites such as sage scrub in the south half or northwest quarter.
 - Hand treatment by hand crews is recommended for steep sites and sites with heavy fuels such as shrub fuel and steep-sloped areas in the northwest quarter of the combined site.
 - Spot control with herbicides. Herbicides would be used to control undesired weeds or selective vegetation within fuel modification areas.
 - Partner Collaboration for Fire Prevention. County DPR shall coordinate with neighboring entities, including BCLT, Greater Alpine Fire Safe Counsel, the Alpine FPD, San Diego County Fire Authority, FPD, CAL FIRE, County Road Department, and San Diego Gas & Electric, on regional defensible-space initiatives, fuel modification, and structural defense initiatives, including sharing of resources, planning, and costs.
 - Comply with the Regional Wildfire and Evacuation Plan: (see Section 4.20, Wildfire). The San Diego County WUI Fire Emergency Response Plan has been updated for the Alpine ~~South-East~~southeast area as a part of the Rohde and Associates ~~Fire and Emergency Operational Assessment~~FEOA (Appendix J). This document, which is also approved by the San Diego County Fire Chiefs Association and San Diego County Police Chiefs' and Sheriff's Associations and, is the County

standard emergency response and evacuation management plan format for wildfire. County DPR shall implement the project in compliance with the plan.

- Comply with Site-Specific Wildfire and Evacuation Plan. An Alpine Community Park Fire Evacuation Analysis was developed by Chen Ryan Associates (Appendix K) to assess the time required for emergency evacuation from the project site under several scenarios, assuming a wind-driven fire that results in a required evacuation affecting the project site and surrounding community. The traffic evacuation simulations presented within the analysis found that evacuation traffic generated by the project would not significantly increase the average evacuation travel time or result in unsafe evacuation timeframes. Evacuation flow would be able to be effectively managed.

Therefore, implementation of the aforementioned project design features, compliance with applicable ordinances and regulations, and enforcement of County DPR rules and regulations would reduce the potential for the project to exacerbate wildfire risks due to slope, prevailing winds, and other factors, including risks related to pollutant concentrations as a result of a wildfire or the uncontrolled spread of a wildfire. Impacts would be less than significant.

Impact Determination

Implementation of the project would not exacerbate wildfire risks due to slope, prevailing winds, and other factors ~~exacerbate wildfire risks of~~, and thereby would not expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.

Mitigation Measures

No mitigation is required.

Level of Significance After Mitigation

Impacts would be less than significant.

Threshold 3: Implementation of the project would not require the installation or maintenance of associated infrastructure ~~(, such as roads, fuel breaks, emergency water sources, power lines, or other utilities),~~ that may exacerbate fire risk or ~~that may~~ result in temporary or ongoing impacts on the environment.

County Park, Trails, and Open Space/Preserve

Impact Discussion

Construction

The project would ~~not~~ require the construction of infrastructure specific to wildfire protection, (i.e., roads, fuel breaks, emergency water sources, electric, or other utilities). ~~The Furthermore, the project would include~~ require infrastructure improvements ~~to develop~~ as the currently vacant site is developed with an active park and passive recreational facilities. The infrastructure would include a domestic water line, an irrigation water line, a fire service line, storm drains, sewer lines, a fire hydrant, and electricity distribution lines. Construction of the infrastructure improvements would occur during the single construction phase and would use the same construction equipment as previously listed. Construction personnel would comply with the standard construction BMPs to

avoid or minimize potential wildfire risks during construction. The other potential ~~ongoing~~ environmental impacts that could arise from construction of the project are analyzed in Sections 4.1 through 4.19 of this EIR.

Given its partial location within a VHFHSZ, the project would be required to maintain defensible space around project infrastructure, consistent with PRC Section 4291 and the Defensible Space for Fire Protection Ordinance. The County DPR would collaborate with the BCLT to construct fuel breaks on adjacent BCLT parcels. Furthermore, the County DPR and its contractors would implement BMPs for the mitigation of impacts associated with potential ignition sources while constructing the fuel breaks.

The project would also comply with all applicable CBC and CFC requirements for development in a VHFHSZ, including, but not limited to, specific requirements for structural hardening, water supply and flow, hydrant and standpipe spacing, signage, and fire department access. Therefore, the project would not require the installation or maintenance of associated infrastructure that may exacerbate fire risks or result in temporary or ongoing impacts on the environment.

Operation

~~Operation of the~~ The project would include ~~the~~ operation of the above-mentioned utilities. Maintenance of this infrastructure would occur infrequently throughout the life of the project. Because the project would comply with PRC Section 4291, the Defensible Space for Fire Protection Ordinance, all applicable CBC and CFC requirements for development in a VHFHSZ, and the Operational Area Emergency Operations Plan, ~~the~~ its potential to exacerbate wildfire risk on site would be reduced. The presence and ongoing maintenance of infrastructure on the project site would not introduce any specific conditions that would result in exacerbation of wildfire risk any more than operation of the rest of the project facilities. Additionally, the potential ongoing environmental impacts caused by operation of the project infrastructure are analyzed in Sections 4.1 through 4.19 of this EIR. Therefore, the project would not require the installation or maintenance of associated infrastructure that may exacerbate fire risk or result in temporary or ongoing impacts on the environment.

Impact Determination

The project would ~~not~~ require the installation or maintenance of ~~associated~~ infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) ~~that may~~. The County DPR would collaborate with the BCLT to construct fuel breaks on the adjacent BCLT parcels. Furthermore, the County DPR and its contractors would implement standard BMPs for the mitigation of impacts associated with potential ignition sources while constructing the fuel breaks. The project would also comply with all applicable CBC and CFC requirements; therefore, implementation of project would not exacerbate fire risks or result in temporary or ongoing impacts on the environment. Impacts would be less than significant.

Mitigation Measures

Mitigation is not required.

Level of Significance After Mitigation

Impacts would be less than significant.

Threshold 4: The project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

County Park and Trails, and Open Space/Preserve

Impact Discussion

Wildfires can greatly reduce the amount of vegetation ~~from on~~ hillsides. Plant roots stabilize the soil, and above-ground plant parts slow water, allowing it to percolate into the soil. Removal of surface vegetation resulting from a wildfire reduces the ability of the soil surface to absorb rainwater and can allow for increased runoff that may include large amounts of debris. If hydrophobic conditions exist post-fire, the rate of surface water runoff is increased as percolation of water into the soil profile is reduced (DeGomez 2011).

Downslope or downstream flooding, mudflows, and landslides are common in areas where steep hillsides and embankments are present and such conditions would be exacerbated in a post-fire environment where vegetative cover has been removed. Additionally, increases in surface runoff and erosion are possible in a post-fire environment where surface vegetation has been removed and steep slopes can increase runoff flow velocity. As presented in Section 4.7, *Geology and Soils*, the project site is gently sloping and is underlain by erosive soils.

Construction

Construction activities for the project would involve earthwork, which would remove the ground cover and disturb surface soils, exposing loose soils and potentially increasing erosion, which could result in post-fire slope instability if a fire were to occur during construction. However, as detailed in Section 4.7, *Geology and Soils*, and Section 4.10, *Hydrology and Water Quality*, the project would be required to prepare and implement a Stormwater Pollution Prevention Plan outlining BMPs for the construction phase to prevent soil erosion and stormwater runoff, which would remove soil material from the project site and further reduce absorption. Additionally, a Stormwater Quality Management Plan would be prepared for the project site consistent with the requirements of the County of San Diego BMP Design Manual, which would contain site-specific design measures, source controls, and/or treatment control BMPs such as landscaped areas, berms, and stormwater retention basins to reduce potential pollutants, including sediment from erosion or siltation. Furthermore, development in the northernmost portion of the project site, which is the most sloped, would be minimal and would retain several groves of existing trees and areas of existing vegetation. Maintaining existing vegetation would maintain stability along the slope. Additionally, an existing dirt footpath would be protected in place and would not undergo ground-disturbing activities. The central and southern portions of the project site would involve substantial grading to support the proposed development as well as the proposed berm along the eastern side. However, the project site will still slope gradually from the north to the south. The graded areas would be revegetated with approved, native, fire-resistant species once construction is complete. Construction would alter drainage patterns on the site, but construction would also include drainage features such as culverts, storm drains, biofiltration basins, and catch basins designed to minimize stormwater runoff and erosion from the site. All of these features would reduce runoff, slope stability, and drainage changes that could potentially result in significant risks, including downslope or downstream flooding or landslides.

Operation

Operation of the project would include the development of active recreation facilities with impervious surfaces, including the equestrian staging area, parking areas, the paved walkway, courts, restrooms, and an administrative building. Impervious surfaces result in more stormwater runoff than the existing natural habitat on the project site. However, the project is designed with natural vegetation surrounding the developed areas of the park and the entirety of the project site. Revegetation, as well as project design features including drainage culverts, biofiltration basins, storm drains and catch basins, would reduce runoff and erosion conditions on site. There would be no steep slopes on the project site and, where the project site consists of a gradual slope, there would be either active park facilities or vegetated open space/preserve; these features would not exacerbate conditions such as slope instability that would result in downslope or downstream flooding or landslides, or other significant risks.

Impact Determination

The project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. ~~Due to~~ Because of the gradual slope of the project site, the proposed design features, and implementation of construction BMPs, impacts would be less than significant.

Mitigation Measures

Mitigation is not required.

Level of Significance After Mitigation

Impacts would be less than significant.

~~4.20.6~~ 4.20.7 Summary of Significant Impacts

There would be no significant impacts related to wildfire.

6.1 Overview

This chapter describes and analyzes a range of reasonable alternatives that could feasibly attain most of the basic project objectives while avoiding or substantially lessening one or more of the significant effects of the project. The primary purpose of this chapter is to ensure that the comparative analysis provides ~~sufficient~~enough detail to foster informed decision-making and public participation in the environmental process.

~~Four~~Five alternatives to the project are analyzed in this chapter and discussed in terms of their merits relative to the project.

- Alternative 1 – No Project Alternative
- Alternative 2 – Sports Complex Alternative
- Alternative 3 – Reconfigured Project Alternative
- Alternative 4 – Reduced Project Alternative
- Alternative 5 – Passive Park Alternative

Based on the analysis below, Alternative 4, the Reduced Project Alternative, would be the environmentally superior alternative.

6.2 Requirements for Alternatives Analysis

The ~~State~~ CEQA Guidelines require that an EIR present a range of reasonable alternatives to a project, or to the location of a project, that could feasibly attain a majority of the basic project objectives, but that would avoid or substantially lessen one or more significant environmental impacts of the project. The range of alternatives required in an EIR is governed by a “rule of reason” that requires an EIR to set forth only those alternatives necessary to permit a reasoned choice. An EIR need not consider every conceivable alternative to a project. Alternatives may be eliminated from detailed consideration in the EIR if they fail to meet most of the basic project objectives, are not feasible, or do not avoid or substantially lessen any significant environmental effects (~~State~~ CEQA Guidelines; Section 15126.6(~~[c]~~)).

In addition to the requirements described above, CEQA requires the evaluation of a No Project Alternative, which analyzes the environmental effects that would occur if the project did not proceed (~~State~~ CEQA Guidelines Section 15126.6(~~[e]~~)). Moreover, the EIR is required to identify the environmentally superior alternative. If the environmentally superior alternative is the No Project Alternative, the EIR must also identify an environmentally superior alternative among the other alternatives (~~State~~ CEQA Guidelines Section 15126.6(~~[e]~~)(~~[2]~~)).

6.3 Selection of Alternatives

In developing alternatives that meet the requirements of CEQA, the starting point is the project's objectives. The project includes the following objectives.

1. Create a place where all Alpine residents can gather and connect as a community.
2. Anticipate, accommodate, and manage a variety of active and passive recreational uses and open space preserve that benefit all members of the Alpine community both now and in the future.
3. Provide for long-term natural and cultural resource management consistent with the goals and objectives of the Multiple Species Conservation Program (MSCP) for the preserve portion of the property.
4. Design a community park that integrates and, where feasible, preserves natural features into the park design.
5. Enhance the quality of life in Alpine by providing exceptional park and recreation opportunities that improve health and wellness, while preserving significant natural and cultural resources.
6. Protect public health and safety by incorporating the Crime Prevention Through Environmental Design and other safety measures into the park design.
7. Manage Alpine County Park consistent with County DPR's missions, policies, directives, and applicable laws and regulations.
8. Reflect Alpine community's heritage through inclusion of architectural elements that reflect the rural nature of Alpine.

CEQA also requires that alternatives be feasible. *Feasible* is defined in CEQA as “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors” (Public Resource Code Section 21061.1). The ~~State~~ CEQA Guidelines indicate that the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, other plans or regulatory limitations, and jurisdictional boundaries ~~and, along with~~ whether the proponent can reasonably acquire, control, or otherwise have access to the alternative site (~~State~~ CEQA Guidelines Section 15126.6).

Finally, the alternatives should also avoid or substantially lessen one or more significant environmental impacts that would occur under the project. Table 6-1 summarizes the project's significant impacts, which have been identified to assist with focusing the analysis of alternatives in Section 6.5.

Table 6-1. Summary of Significant Effects of the Project

Resource Impact	Significant and Unavoidable	Less than Significant with Mitigation
Section 4.1, Aesthetics and Visual Resources		
Impact-AES-1: Substantially Degrade Rural Views from Public Vantage Points during Construction.		X
Impact-AES-2: Substantially Degrade Rural Views from Public Vantage Points d During Operation.		X
Impact-AES-3: New Source of Light Adversely Affecting Nighttime Views.		X
Section 4.2, Agriculture and Forestry Resources		
N/A		
Section 4.3, Air Quality and Health Risk		
Impact AQ-1: Objectionable Odors.		X
Section 4.4, Biological Resources		
Impact-BIO-1: Significant Impacts on QCB Occupied Habitat.		X
Impact-BIO-12: Significant Impacts on Decumbent Goldenbush.		X
Impact-BIO-23: Potentially Significant Impacts on Engelmann Oaks.		X
<u>Impact-BIO-34: Significant Impacts on QCB Occupied Habitat During Construction.</u>		<u>X</u>
<u>Impact-BIO-4: Significant Impacts on Western Spadefoot.</u>		<u>X</u>
<u>Impact-BIO-5: Habitat Impacts on Special-Status Reptiles.</u>		<u>X</u>
Impact-BIO-64: Habitat Potential Impacts on Special-Status Avian Species and other Birds Protected under the MBTA.		X
<u>Impact-BIO-7: Impacts on MBTA-Protected Avian Species During Breeding Season.</u>		<u>X</u>
<u>Impact-BIO-8: Potential Impacts on Breeding Burrowing Owl.</u>		<u>X</u>
<u>Impact-BIO-9: Impacts on Raptor Foraging Habitat.</u>		<u>X</u>
Impact-BIO-105: Significant Impact on Pallid Bat <u>Habitat Impacts on Special-Status Bats.</u>		X
<u>Impact-BIO-11: Potential Impacts on Maternal Roost Sites.</u>		<u>X</u>
<u>Impact-BIO-12: Habitat Impacts on Special-Status Mammals.</u>		<u>X</u>
<u>Impact-BIO-13: Operational Impacts on Special-Status Wildlife Species.</u>		<u>X</u>
Impact-BIO-146: Direct Impacts on Sensitive Natural Communities.		X
<u>Impact-BIO-15: Conflicts with County Consolidated Fire Code.</u>		<u>X</u>
Section 4.5, Cultural Resources		
Impact-CUL-1: Potential to Unearth and Damage Significant Archaeological Resources d During Construction.		X
Section 4.6, Energy		
N/A		
Section 4.7, Geology and Soils		
Impact-GEO-1: Potential Impact on Paleontological Resources.		X
Section 4.8, Greenhouse Gas Emissions and Climate Change		

Resource Impact	Significant and Unavoidable	Less than Significant with Mitigation
Impact-GHG-1: Conflict W with an Applicable Plan, Policy, or Regulation.		X
Section 4.9, Hazards and Hazardous Materials		
Impact-HAZ-1: Potential Release of Contaminated Soil.		X
Section 4.10, Hydrology and Water Quality		
N/A		
Section 4.11, Land Use and Planning		
N/A		
Section 4.12, Mineral Resources		
N/A		
Section 4.13, Noise and Vibration		
Impact-NOI-1: Construction Noise d During Installation of the Sewer System.		X
Impact-NOI-2: Onsite Operational Noise at the Active Park.		X
Section 4.14, Population and Housing		
N/A		
Section 4.15, Public Services		
N/A		
Section 4.16, Recreation		
N/A		
Section 4.17, Transportation and Circulation		
N/A		
Section 4.18, Tribal Cultural Resources		
Impact-TCR-1: Excavation Related to the Project Would Potentially Damage Tribal Cultural Resources.		X
Section 4.19, Utilities and Service Systems		
Impact-UTIL-1: Operation of the Project Has the Potential to Require New or Expanded Water Facilities.		X
Impact-UTIL-2: Insufficient Water Supplies Available to Serve the Project d During Operation.		X
Section 4.20, Wildfire		
N/A		

6.4 Alternatives Considered

A total of six alternatives were initially considered for evaluation. Based on the criteria described in Section 6.3, *Selection of Alternatives*, in addition to evaluating the No Project Alternative, three other alternatives were carried forward. The alternatives that were considered but rejected included an alternate location alternative, which would consist of multiple “mini-parks” throughout Alpine, and a reduced project alternative that would only include the staging area and trails. Alternatives The alternatives below that were carried forward and analyzed below provide variations to adjust.

adjusting various components of the project that would help reduce environmental impacts. Table 6-2 summarizes the buildout acreages for the four alternatives that were carried forward.

Table 6-2. Summary of Alternative Park Acreages

Alternative	Active Park Acreage	Passive Park Acreage	Open Space/ Conservation Acreage	Total Acreage
Alternative 1: No Project	0	0	0	0
Alternative 2: Sports Complex	50	0	46	96
Alternative 3: Reconfigured Project	25	0	71	96
Alternative 4: Reduced Project	20	0	76	96
Alternative 5: Passive Park	0	0.23	95.77	96

6.4.1 Alternatives Considered But Rejected

6.4.1.1 Alternate Location Alternative

County DPR considered an alternative that would relocate the amenities proposed for the park to several “mini-parks” that would be located throughout Alpine instead of within one consolidated location. Potential locations for these mini-parks include multiple other properties in Alpine that have been vetted by County DPR as potential park sites. Out of confidentiality for the owners of the potential properties, this EIR does not disclose the exact locations that were considered. This alternative was rejected because it would not meet many of the project objectives, including creating a place where all Alpine residents can gather and connect as a community. This alternative also would not enable long-term natural and cultural resources management. Furthermore, this alternative does not meet the CEQA standard as being a “feasible” alternative given that the County does not own other properties in Alpine, and therefore could not accomplish implementation of a new park at these other potential locations within a reasonable period of time.

6.4.1.2 Equestrian Staging and Trails Only Alternative

This alternative would only include development of the equestrian staging area within the northwestern portion of the project site and retention of the existing 1.1 miles of multi-use trails. This alternative was similarly rejected because it would not meet many of the project objectives, including Objectives 1, 2, and 5, because it would not provide a place where all Alpine residents can gather as a community, it would not provide a variety of active and passive recreational uses or an open space preserve, and it would not enhance the quality of life in Alpine by providing exceptional park and recreational opportunities.

6.4.2 Alternatives Selected for Analysis

6.4.2.1 Alternative 1 – No Project Alternative

Under the No Project Alternative, none of the proposed actions described in Chapter 3, *Project Description*, would occur at the 96.6-acre project site. The site would remain undeveloped and would not include 25 acres of active recreational uses, including potential multi-use turf areas, a

baseball field, an all-wheel park, a bike skills area, recreational courts (i.e., basketball, pickleball, ~~game table plaza~~), fitness stations, a leash-free dog area, restroom facilities, an administrative facility/ranger station, an equestrian staging area and a corral, a nature play area, a community garden, a volunteer pad, picnic areas with shade structures, and picnic tables, a game table plaza, and multi-use trails. The creation of a Habitat Conservation Plan for the remaining 71.6 acres would also not occur under this alternative.

6.4.2.2 Alternative 2 – Sports Complex Alternative

Under the Sports Complex Alternative (refer to Figure 6-1), a greater ~~area~~ portion of the project site would be allocated to active recreational uses ~~and~~. These would include ~~sports fields intended for~~ competitive sports, including club soccer and baseball teams. Under this alternative, a total of 50 acres of the project site would be developed with multi-use turf areas for soccer, etc., as well as baseball fields; and the other features described in Section 3.3.1 of Chapter 3, including a skate park and an equestrian staging area. In addition, because ~~this~~ sports complex would ~~be intended to~~ accommodate competitive teams, extended hours would be allowed, and field lighting for nighttime activities would be installed. The number of parking spaces would also be increased to accommodate the increase in parking demand that could occur with the larger active recreational space. The remaining 46 acres of the project site would include open space/conservation area for which a Habitat Conservation Plan would be created.

6.4.2.3 Alternative 3 – Reconfigured Project Alternative

Under this alternative, the area of active recreation would be the same as under the project (25 acres) but moved to the southern portion of the site ~~and~~ with adjustments to the amenities and proposed design of the park (refer to Figure 6-2). All ~~the~~ active use features would remain, including the multi-use fields, baseball field, basketball, and pickleball courts, and skate, and bike parks. The picnic areas, equestrian staging area, dog park, and community garden areas would remain. The landscaped berm for screening ~~berm~~ would be removed, and the parking lot/drive aisles would be relocated to the interior of the site so that the exterior would remain green-scaped with native vegetation. A walking path would be added to the periphery of the active park area. This alternative would also include conservation of the remaining 71.6 acres of the project site with implementation of a Habitat Conservation Plan.

6.4.2.4 Alternative 4 – Reduced Project Alternative

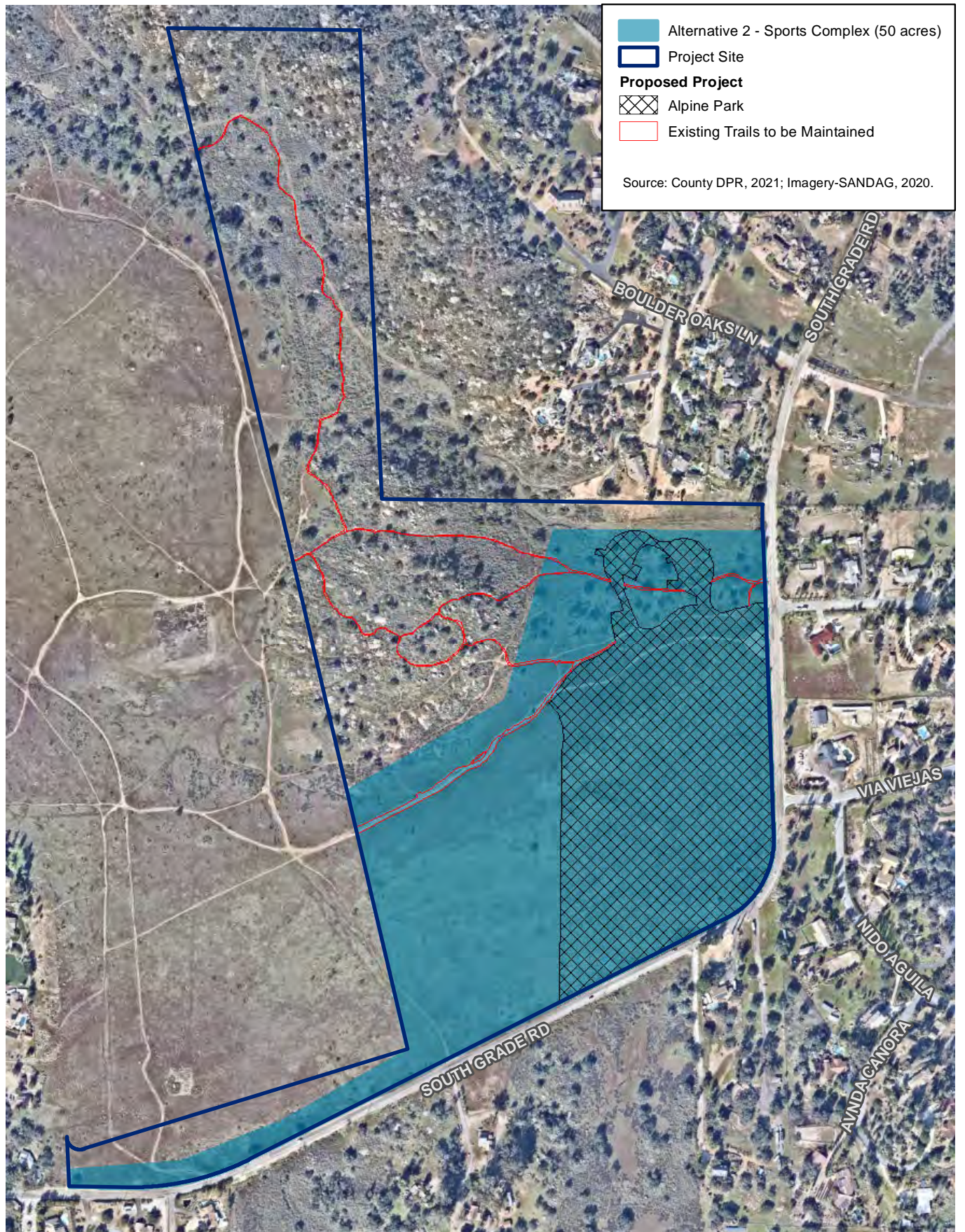
Under the Reduced Project Alternative (refer to Figure 6-3), the total square footage of the park would be reduced to 20 acres. All ~~the~~ active use features would remain, including the multi-use fields, baseball field, and basketball, and pickleball courts, except for the skate and bike parks, which would be eliminated. Passive recreational amenities would remain ~~and would include, including~~ the equestrian staging area, ~~the~~ multi-use trails, ~~the~~ game table plaza, ~~the~~ dog park, picnic areas, and ~~the~~ community garden, but ~~all at with~~ reduced square footages. The remaining area—76.6 acres—would consist of conservation/open space area, including multi-use trails and a Habitat Conservation Plan.

6.4.2.5 Alternative 5 – Passive Park Alternative

Under the Passive Park Alternative (refer to Figure 6-4), the project site would be developed with a 0.23-acre passive park. The formalized parking lot or staging area would be located within the disturbed area adjacent to South Grade Road, south of the intersection with Calle De Compadres.

The parking area, which would be graded as needed, would consist of dirt and/or decomposed granite (DG), creating an impervious surface for one or two Americans with Disabilities Act- (ADA-) compliant parking spaces. A split-rail fence would be constructed around the perimeter of the parking area. Alternative 5 would include a formalized parking area with access to the existing trails through disturbed areas to ensure that no vegetation would be affected. The Passive Park Alternative would establish the existing 1.1 miles of multi-use trails for public use. No restrooms or similar facilities that would require a higher level of on-site maintenance and ranger presence would be developed, but there would be a kiosk and a bench in a disturbed area at the trail head.

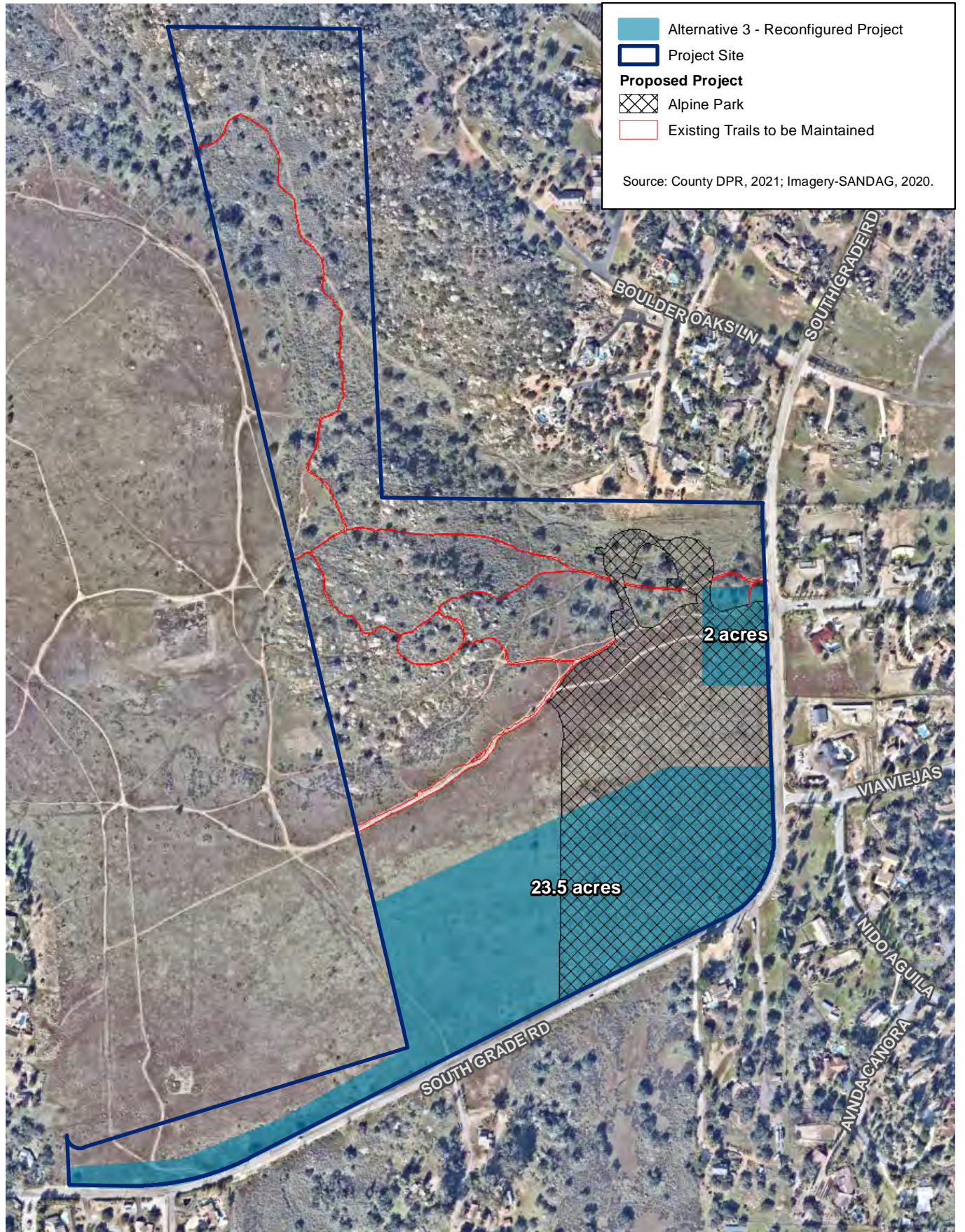
\\PDC\OTRDS\GIS\Projects - 1\County of San Diego\DRM\SA 56775\T033 Alpine Park HCP\Figures\Doc\ER\ER06_01 Alt2 SportsComplex.mxd User: 19542 Date: 7/20/2021



0 250 500
1 in = 500 ft Feet

Figure 6-1
Alternative 2: Sports Complex Alternative
Alpine Park Project

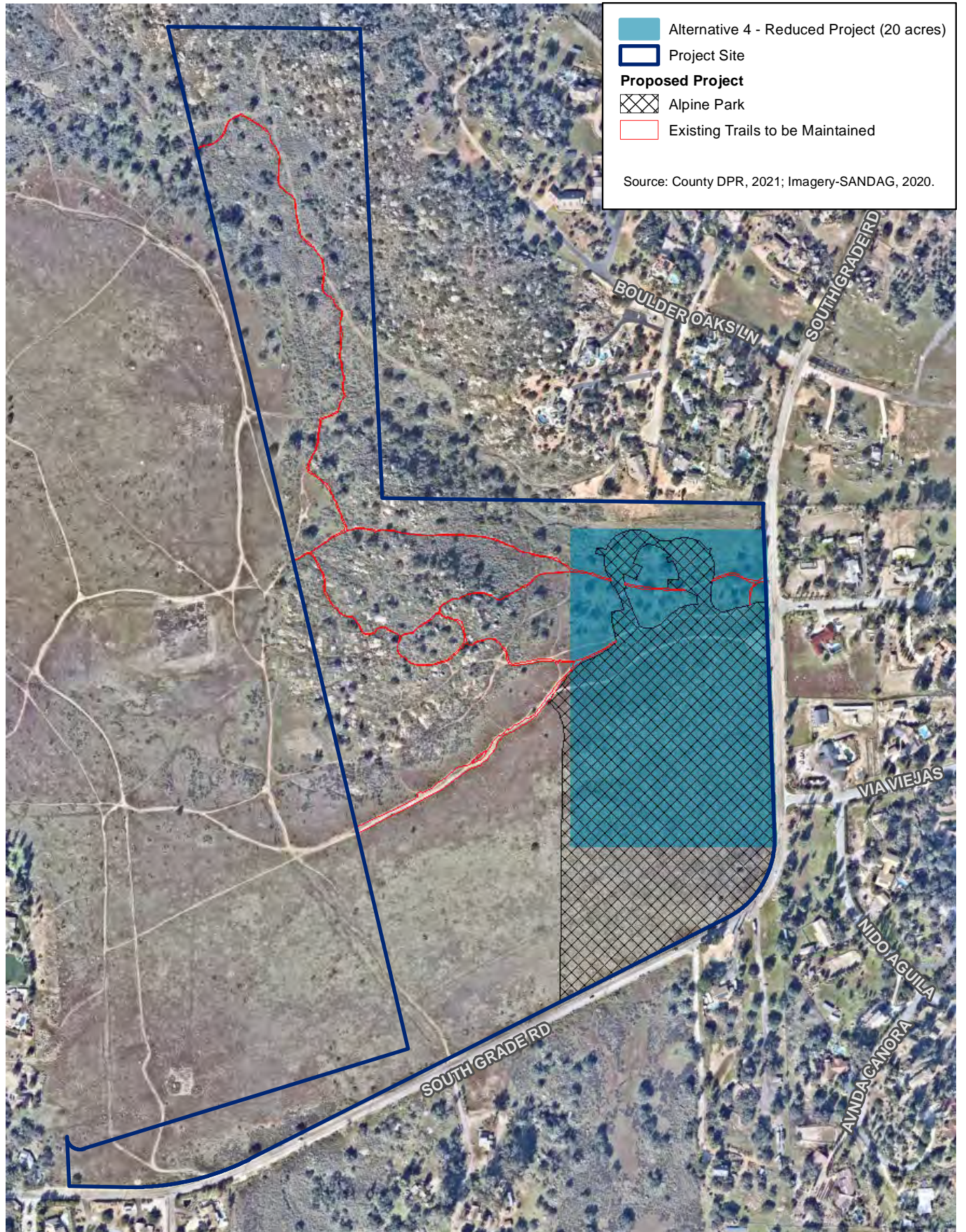
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1 in = 500 ft Feet

Figure 6-2
Alternative 3: Reconfigured Project Alternative
Alpine Park Project

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1 in = 500 ft Feet

Figure 6-3
Alternative 4: Reduced Project Alternative
Alpine Park Project

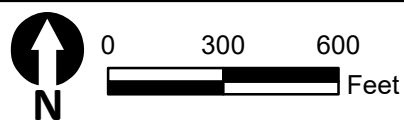
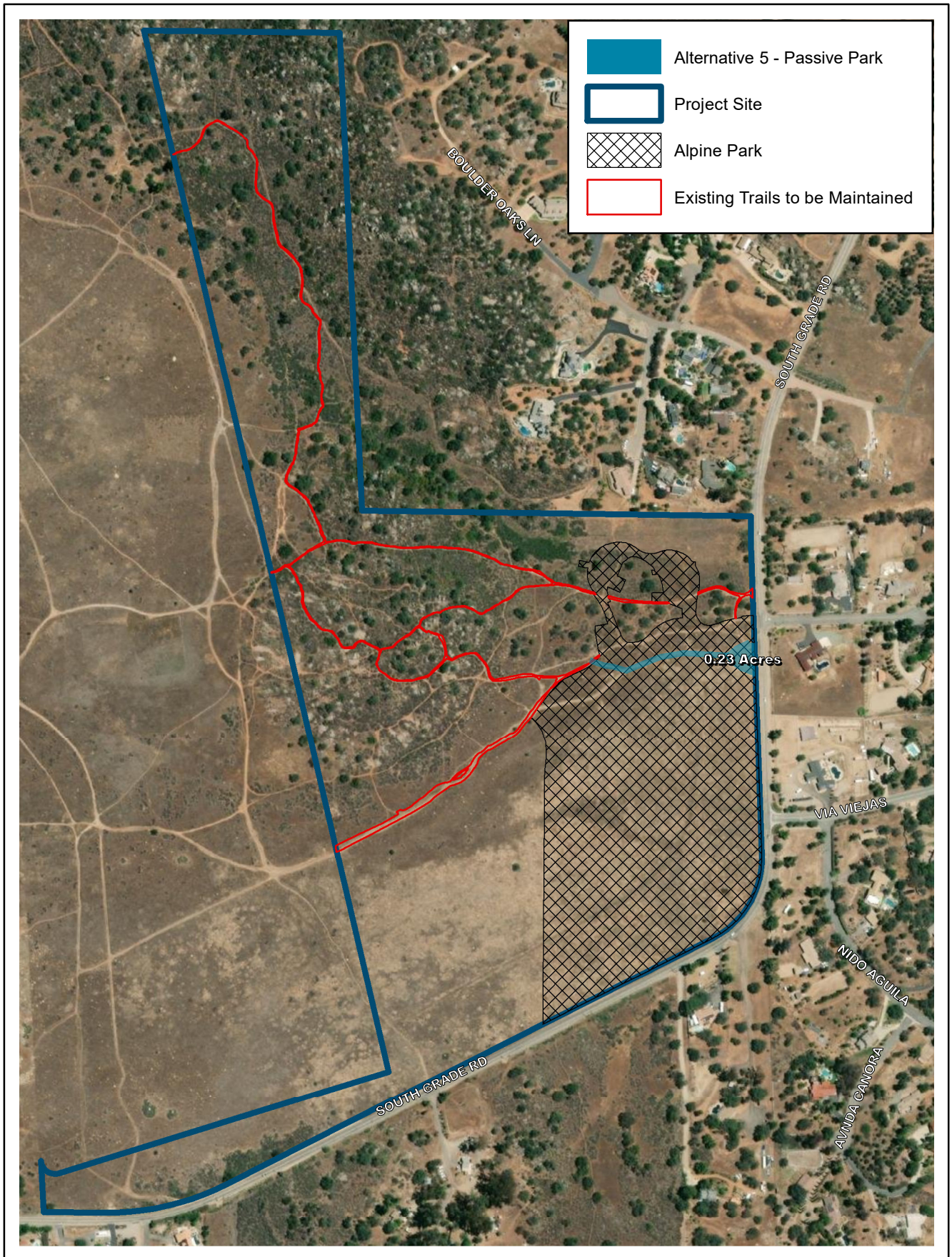


Figure 6-4
Alternative 5: Passive Park Alternative
Alpine Park Project

6.5 Analysis of Alternatives

This section discusses each of the project alternatives and determines whether each alternative would avoid or substantially reduce any of the significant impacts of the project. This section also identifies any additional impacts resulting from the alternatives that would not result from the project and considers the alternatives' respective relationships to the project's basic objectives. A summary comparison of the impacts of the project and the alternatives under consideration is included as Table 6-3 at the end of this chapter.

6.5.1 Analysis of Alternative 1 – No Project Alternative

6.5.1.1 Aesthetics and Visual Resources

The existing project site consists of undeveloped, ~~vegetated~~ rural land, ~~and the~~ with vegetation. The visual character is defined by open, rural, ~~and~~ undisturbed natural features. Under Alternative 1, the existing site would remain as it is. This alternative would not involve any construction or operational activities and would not introduce new features to the site that would affect the visual character ~~and~~. In addition, it would not introduce new sources of light or glare ~~to~~ at the site. Therefore, Alternative 1 would avoid impacts ~~on~~ related to aesthetics and visual resources, ~~and impacts~~. The impact would be reduced ~~when~~ compared to the project.

6.5.1.2 Agriculture and Forestry Resources

Because Alternative 1 would not result in any changes at the project site, there would be no potential for conversion of or conflict with any agricultural uses or zoning. However, while a portion of the project site is mapped as Farmland of Local Importance, the site is currently not used for agriculture and does not contain agricultural resources that meet the Prime and Statewide soil criteria. The project site does not contain lands zoned for forest land or timberland. Under Alternative 1, no impacts on agriculture or forestry resources would occur, which would be similar to the project.

6.5.1.3 Air Quality

Under Alternative 1, the project site would remain undeveloped and would not introduce any new sources of emissions or odors. No impacts related to air quality would occur under Alternative 1, ~~and impacts~~. The impact would be reduced compared to the project.

6.5.1.4 Biological Resources

Alternative 1 would not involve any construction activities at the project site, and the site's existing native vegetation would remain undisturbed. Therefore, Alternative 1 would avoid impacts on sensitive natural communities or on any special-status species. No impacts on biological resources would occur under Alternative 1 ~~and impacts~~. The impact would be reduced compared to the project. However, the project also includes activities that would restore habitat on the project site and includes in-perpetuity management and monitoring of the project site consistent with the County's MSCP. Under Alternative 1, a Habitat Conservation Plan would not be prepared for the site and onsite restoration would not occur.

6.5.1.5 Cultural Resources

Alternative 1 would not involve any ground-disturbing activities and would not have the potential to damage or destroy any previously unidentified archaeological resources. No impacts would occur on cultural resources under Alternative 1, and impacts would be reduced compared to the project. However, the project ~~also includes~~ activities that would protect and manage onsite cultural resources in perpetuity. Under Alternative 1, ~~the~~ at same level of cultural resources management would not occur.

6.5.1.6 Energy

Alternative 1 would not involve any changes to the project site and would, therefore, not involve construction activities that have the potential to conflict with the County's 2018 Climate Action Plan (CAP). Because Alternative 1 would not introduce any new uses at the site, there would be no change in energy consumption under this alternative, and no impacts would result related to energy. Therefore, energy impacts under Alternative 1 would be reduced compared to the project.

6.5.1.7 Geology and Soils

Alternative 1 would not result in any changes to the project site and would not require any ground-disturbing activities during construction. Therefore, Alternative 1 would not have the potential to damage or destroy any paleontological resources and would result in no impacts related to geology and soils. Impacts on geology and soils under Alternative 1 would be reduced compared to the project.

6.5.1.8 Greenhouse Gas Emissions

Alternative 1 would not involve any changes to the project site and, therefore, would not involve construction activities that have the potential to conflict with the County's 2018 CAP. Because Alternative 1 would not introduce any new uses at the site, there would be no change in greenhouse gas (GHG) emissions under this alternative, and no impacts related to GHG emissions would occur. Therefore, impacts related to GHG emissions under Alternative 1 would be reduced compared to the project.

6.5.1.9 Hazards and Hazardous Materials

Alternative 1 would not involve any construction activities and ~~would not~~ not include ground-disturbing activities that could result in the release of contaminated soil into the environment. In addition, Alternative 1 would not involve any changes to the project site and, therefore, would not introduce new conditions at the project site that have the potential to exacerbate wildfire risks. Therefore, no impacts related to hazards and hazardous materials would occur under Alternative 1, ~~and impacts.~~ The impact would be reduced compared to the project.

6.5.1.10 Hydrology and Water Quality

Alternative 1 would not involve any changes at the project site, including construction activities or operational activities that could result in increased stormwater runoff. Alternative 1 would not affect groundwater recharge or groundwater supplies or alter the drainage of the site. No impacts related to

hydrology and water quality would occur under Alternative 1. Therefore, impacts would be reduced compared to the project's less-than-significant impacts related to hydrology and water quality.

6.5.1.11 Land Use and Planning

Alternative 1 would not involve any changes to the existing uses at the project site and would not have the potential to physically divide an established community or cause a significant environmental impact due a conflict with a land use plan, policy, or regulation adopted for the purposes of avoiding or mitigating an environmental effect. No impacts related to land use and planning would occur under Alternative 1, ~~and impacts. The impact~~ would be reduced compared to the project.

6.5.1.12 Mineral Resources

As discussed in Section 4.12, *Mineral Resources*, the project site does not contain mineral deposits or active mines and would not result in the loss of locally important mineral resources. Alternative 1 would not result in any development at the site and would result in less-than-significant impacts related to mineral resources, similar to the project.

6.5.1.13 Noise and Vibration

Alternative 1 would not involve any construction or operational activities that have the potential to generate substantial increase in noise at the site. No impacts related to noise would occur under Alternative 1, ~~and impacts. The impact~~ would be reduced compared to the project.

6.5.1.14 Population and Housing

Alternative 1 would not involve any construction or operational activities at the project site and would not induce ~~any~~ population growth or displace people or housing. Alternative 1 would result in no impacts related to population and housing, ~~and impacts. The impact~~ would be reduced compared to the project.

6.5.1.15 Public Services

Alternative 1 would not involve any construction or operational activities at the project site and would not result in any increased demand on public services. Alternative 1 would result in no impacts related to public services, ~~and impacts. The impact~~ would be reduced compared to the project.

6.5.1.16 Recreation

Alternative 1 would not involve the construction or operation of a new park at the project site and would not bring new active or passive recreational resources to a community that is deficient in park space. As such, because Alternative 1 would not provide new recreational facilities to meet the existing or future demand, this alternative could result in the increased use of existing neighborhood or regional parks or other recreational facilities such that substantial deterioration could occur, or could require the construction of new or expanded parks elsewhere, which might have adverse impacts on the environment ~~not already identified in this EIR~~. Impacts may be potentially significant. Therefore, Alternative 1 would result in increased impacts related to recreation compared to the project.

6.5.1.17 Transportation and Circulation

Alternative 1 would not introduce any new uses at the site and, as such, would not generate any new sources of traffic traveling to or from the project site. As such, no impacts related to transportation and circulation would occur under Alternative 1, ~~and impacts. The impact~~ would be reduced compared to the project.

6.5.1.18 Tribal Cultural Resources

Alternative 1 would not involve any ground-disturbing activities and would not introduce any new activities at the project site. Therefore, Alternative 1 would not have the potential to damage or destroy any previously unidentified archaeological resources. No impacts would occur on tribal cultural resources under Alternative 1, and impacts would be reduced compared to the project. However, the project also includes activities that would protect and manage onsite cultural resources in perpetuity. Under Alternative 1, the same level of cultural resources management would not occur.

6.5.1.19 Utilities and Service Systems

Alternative 1 would not introduce any new uses at the project site and would not increase demand on any utilities. No impacts related to utilities would occur under Alternative 1, ~~and impacts. The impact~~ would be reduced compared to the project.

6.5.1.20 Wildfire Hazards

Alternative 1 would not introduce any new uses at the project site and would not increase potential human-related ignition sources. No impacts related to wildfire would occur under Alternative 1, ~~and impacts. The impact~~ would be reduced compared to the project.

6.5.1.21 Relationship to Project Objectives

Alternative 1 would avoid or reduce ~~the~~ impacts related to the majority of the resource areas, ~~including (i.e.,~~ aesthetics and visual resources, air quality, biological resources, cultural resources, energy, geology and soils, GHG emissions, hazards and hazardous materials, noise, transportation and circulation, tribal cultural resources, utilities and service systems, ~~and wildfire)~~. Alternative 1 would result in minimally reduced impacts related to hydrology and water quality, land use and planning, population and housing, and public services; and ~~would result in~~ similar impacts related to agriculture and forestry resources and mineral resources.

Alternative 1 could result in a greater level of impact related to recreation ~~and~~. ~~In addition, it would not result in the benefits to~~ ~~for~~ biological and cultural resources that would be realized through implementation of the project. Alternative 1 would meet only ~~meet~~ one of the project objectives (Objective #3), ~~because it~~. It would still provide for long-term natural and cultural resource management at the project site, albeit at a lower level of benefit compared to the project.

Alternative 1 would not achieve any of the other objectives related to creating a community gathering place, enhancing the quality ~~and~~ of life and public health of the community, ~~and~~ ~~or~~ accommodating a variety of active and passive recreational uses.

Objective 1: Create a place where all Alpine residents can gather and connect as a community.

The County General Plan Conservation and Open Space Element includes Goal LU-18, which encourages the development of civic uses that enhance community centers and places (County General Plan, p. 3-46). Alternative 1 would not be compatible with this goal of providing the community with a new location to gather and connect because Alternative 1 would not have the amenities or infrastructure to support it. In addition, the County General Plan Environmental Justice Element includes goal EJ-13, which aims to expand access to parks, recreational facilities, and other safe places for community members to be active (County General Plan, p. 9-47). Although the proposed project would be consistent with this goal, Alternative 1 would not provide a space for the community to be active or congregate.

Objective 2: Anticipate, accommodate, and manage a variety of active and passive recreational uses and open space/preserve lands that benefit all members of the Alpine community, both now and in the future.

The County General Plan Conservation and Open Space Element includes Goal COS-21, which aims to provide park and recreational facilities that enhance the quality of life and meet the diverse active and passive recreational needs of county residents and visitors, protect natural resources, and foster an awareness of local history, with approximately 10 acres of local parks and 15 acres of regional parks provided for every 1,000 persons in the unincorporated county. Policy COS-21.1, Diversity of Users and Services, calls for providing parks and recreational facilities that create opportunities for a broad range of recreational experiences to serve user interests. Although there are adjacent passive parks and some smaller active parks in the vicinity, the County's goal is to provide active and passive park opportunities to all local citizens of all age groups and all abilities. The private parks in the vicinity are not available to all citizens within Alpine, which is contrary to the goal for the county. Alternative 1 would not provide facilities or meet the objectives of Policy 21.1. In addition, according to the County Parks Master Plan, population density is projected to increase by 61 percent in the central Alpine Community Plan Area's (CPA) by 2040 (County Parks Master Plan, p. 53). As a result, the demand for parks and recreational services will increase substantially over the coming years. Because the community already has a deficit with respect to parkland, with only 1.83 acres per person, this will place greater demand on existing facilities. Alternative 1 would not address these concerns or contribute to responsibly furthering the region's growth.

Objective 3: Provide for long-term natural and cultural resource management consistent with the goals and objectives of the MSCP for the preserve portion of the property.

Both the proposed project and Alternative 1 would be compatible with the objective of providing long-term natural and cultural resource management consistent with the goals and objectives of the MSCP for the preserve portion of the property. However, with the proposed project, there would be a volunteer living on-site as well as park rangers patrolling the area daily. Therefore, although both the proposed project and Alternative 1 would have a Resource Management Plan, the proposed project would have additional on-site daily management for both the park and the preserve. The proposed project would have designated trails with trash cans that would be emptied daily to prevent trash from accumulating; therefore, staff would be on-site daily. With Alternative 1, there would be no formalized trails or staff members on-site daily to prevent the public from affecting sensitive resources. Furthermore, the larger designated parking area of the proposed project, with staff members on-site, would prevent the public from parking in sensitive habitat and thereby potentially negatively affecting natural and cultural resources, which could

occur with Alternative 1. Alternative 1 would not have a parking area or staff members on-site daily to prevent the public from parking within sensitive environmental resources. The proposed project would also create a walking path along the north side of South Grade Road, along County property, and a four-way stop with crosswalks, allowing the public to access trails through designated routes without crossing through proposed preserve land to the south to access the trails. In addition, the proposed project would include native grassland restoration that would benefit QCB habitat through the removal of non-native invasive species and create breeding pools for western spadefoots, which would expand the existing breeding population from Wright's Field. This would not occur with Alternative 1.

Objective 4: Design a community park that integrates and, where feasible, preserves natural features into the park design.

The County General Plan Land Use Element includes Goal LU-6, which aims to balance the built environment with the natural environment, scarce resources, natural hazards, and the unique local character of individual communities (County General Plan, p. 3-29). Policy LU-6.6, Integration of Natural Features into Project Design, requires incorporation of natural features, including mature oaks, indigenous trees, and rock formations, into proposed development and avoidance of sensitive environmental resources. In the northern portion of the project site, in areas where equestrian facilities would be developed, groves of oaks would remain in place; development, as well as new landscaping, would be situated around the trees. However, Alternative 1 would not have a community park and therefore would not meet that objective.

Objective 5: Enhance the quality of life in Alpine by providing exceptional park and recreational opportunities that improve health and wellness while preserving significant natural and cultural resources.

The County General Plan Conservation and Open Space Element includes Goal COS-22, which aims to provide high-quality parks and recreational programs that promote the health and well-being of County residents while meeting the needs of a diverse and growing population (County General Plan, p. 5-40). The proposed project would achieve this goal by providing Alpine with a multitude of recreational opportunities. Policy COS-22.1, Variety of Recreational Programs, also seeks to promote both active and passive recreational facilities, which would not be provided by Alternative 1 (County General Plan, p. 5-41).

Alternative 1 would not offer programs catered to the community. Under the proposed project, programs at the park would be established according to recommendations from local residents and the many amenities that would exist on the site. For example, more active older adults may enjoy hiking or biking along trails, working out at fitness stations, or taking an instructor-led Yoga or Zumba class. Less active older adults may enjoy working with plants in the community garden, reading a book on a shaded park bench, or socializing at the dog park. Alternative 1 would not support these programs, and given the lack of suitable parkland in Alpine, it is unlikely that the community would be provided with these enrichment programs elsewhere. In addition, no daily ranger presence would be established under Alternative 1, given the lack of on-site facilities. This would prevent the community from receiving regular park programs, classes, and events held by rangers on County properties to teach visitors about the land and local wildlife, area history, and the importance of park stewardship.

Live Well San Diego is the County's vision for addressing long-standing inequities and disparities through key interventions, programs, and services in communities that face barriers to achieving outcomes for building better health. It aligns the efforts of individuals, organizations, and government to help County residents live well and includes specific strategies to track outcomes related to health, wellness, and equity. The Live Well San Diego Community Health Assessment (CHA) is a systematic examination of the health status indicators for the population of San Diego County and used to identify key assets, trends, and challenges in a community. The purpose is to provide data and information to inform community health planning efforts. The County's Health and Human Services Agency (HHS) divides the county into six regions to analyze under the CHA. Alpine is located in the East County region.

Live Well San Diego establishes community health indicators related to the built environment, including the percentage of the population living within 0.25 mile of a park. Access to parks and recreational services has been shown to have positive health impacts, including the physical, social, and mental aspects of health and well-being for community members. Parks and open spaces help to reduce chronic diseases, improve mental health, foster community connections, and encourage physical activity. According to the CHA, only 18.5 percent of Alpine's population lives within 0.25 mile of a park or community space compared to the East County population average of 53.3 percent and 61.5 percent countywide. Alpine has one of the lowest percentages of the population living within 0.25 mile of a park or community space in East County (CHA 2019–2021, p. 208). As a community with a deficit of parkland, Alpine would greatly benefit from the addition of an active park, which Alternative 1 would not provide.

According to Live Well San Diego, the recommended level of physical activity for adults is a total of 150 minutes of moderate activity every week. In 2015, 8.8 percent of adult San Diegans had been diagnosed with heart disease. The region with the highest percentage of residents who had ever been diagnosed with heart disease was East County, at 12.1 percent (CHA 2019–2021, p. 33). The addition of active parkland and recreational spaces would provide the community with a well-maintained, up-to-date, safe, and inviting activity space with much-needed facilities and programs to promote physical activity and contribute to other positive health benefits.

The County General Plan Environmental Justice Element includes Goal EJ-11, which strives to increase physical activity resources and programs to reduce rates of obesity, heart disease, diabetes, and other health-related illnesses for residents of all ages, cultural backgrounds, and abilities in the County. Policy EJ-11.5, Community Engagement, encourages partnering with community-based organizations to create appropriate and relevant programming and support improvements to natural and built-environment placemaking that promote physical activity and recreation (County General Plan, p. 9-46). Alternative 1 would not help the County achieve these policy objectives or make progress toward enhancing the health and wellness of the community.

Objective 6: Protect public health and safety by incorporating Crime Prevention Through Environmental Design and other safety measures into the park design.

The proposed project would protect the public health and safety by acting as a temporary safe refuge area and staging area for the Alpine FPD should a fire occur in Alpine, but Alternative 1 would not. In addition, a four-way stop would slow down traffic on South Grade Road, in addition to the proposed project adding crosswalks and a walking path for the public, which Alternative 1 would not provide. There would also be active monitoring by rangers daily and a volunteer living on-site to protect the area from crime for the proposed project, which Alternative 1 would not provide.

Objective 7: Manage Alpine County Park consistent with County DPR missions, policies, directives, and applicable laws and regulations.

The Alpine community currently has no County parks and only 1.83 acres of parkland per 1,000 residents, which is less than the County General Plan goal of 10 acres of parkland per 1,000 residents. Alpine does not have adequate parkland to meet the recreational needs of the community, and there is a significant shortage of sports fields and other recreational amenities, as noted in the County's Parks Master Plan. Although there are some privately managed recreational spaces, which are operated under joint use agreements or as non-profit facilities, there are currently no County-managed public parks for Alpine residents. The project would provide an opportunity to develop an active park and conserve a substantial portion of the property as open space. The 98 acres would bring DPR closer to reaching park-per-resident goals. The roughly 25 acres within the parcel that are dedicated to active recreation offer enough space to provide a diverse mix of opportunities, ensuring options for residents of all ages, abilities, and interests. In addition, according to the County Parks Master Plan, population density is projected to increase by 61 percent in the central Alpine CPA by 2040 (County Parks Master Plan, p. 53). As a result, the demand for parks and recreational services will increase substantially over the coming years. Because the community already has a deficit of parkland, with only 1.83 acres per person, this will place greater demand on existing facilities. Alternative 1 would not address these concerns or contribute to responsibly furthering the region's growth.

Objective 8: Reflect Alpine community's heritage through inclusion of architectural elements that reflect the rural nature of Alpine.

The proposed project would be consistent with County General Plan Conservation and Open Space Element Goal COS-11.3, which requires development within visually sensitive areas to minimize visual impacts and preserve unique or special visual features, particularly in rural areas, through creative site planning; integration of natural features into the project; appropriate scale, materials, and design to complement the surrounding natural landscape; and minimal disturbance of topography. Alternative 1 would not meet Objective 8. It would not include the numerous new structures proposed by the project, such as fencing, shade structures, a playground, picnic tables, a bike park and all-wheel park, equestrian corral, restroom, administration building, and storage structures. These structures would be designed to complement the rural agricultural character of the surrounding area. The omission of these structures under Alternative 1 would preclude an opportunity to enhance the community's rural aesthetic and heritage.

6.5.2 Analysis of Alternative 2 – Sports Complex Alternative

6.5.2.1 Aesthetics and Visual Resources

The existing project site consists of undeveloped, vegetated rural land, and the with vegetation. The visual character is defined by open, rural, and undisturbed natural features. Under Alternative 2, a larger area of the project site would be developed for active recreational uses than would occur under the project. A greater portion of the project site would be converted to active recreational uses and, which would alter the visual character of the site, transforming it from an undeveloped, vegetated rural character land with expansive views of spacious fields to a developed site with playing fields, landscaped berms, parking lots, and other features associated with a community park. Therefore, Alternative 2 would result in significant and unavoidable impacts on the visual quality and character of the site. In addition, Alternative 2 would allow competitive team events, which

would involve extending the hours of operation into the evening and ~~would~~ require the installation of stadium lighting. **MM-AES-3**, which requires that all outdoor lighting be turned off 1 hour after closing, would not be applicable in this scenario, ~~and while~~. Although other mitigation measures would be identified to reduce the impact of this lighting, the introduction of stadium lighting to a currently undeveloped site within a rural area, ~~would have a substantial and impact that~~ would be significant and unavoidable. Because this alternative would result in a greater area of development and ~~would~~ introduce stadium lighting to an undeveloped site, this alternative would result in substantially greater impacts on aesthetics and visual resources ~~when~~ compared to the project.

6.5.2.2 Agriculture and Forestry Resources

Alternative 2 would result in ~~the~~ development of the project site, transforming it from an undeveloped site to a site with a community park. However, ~~while~~although a portion of the project site is mapped as Farmland of Local Importance, the site is currently not used for agriculture and does not contain agricultural resources that meet the Prime and Statewide soil criteria. The project site does not contain lands zoned for ~~forest land~~forestland or timberland. Under Alternative 2, impacts on agriculture or forestry resources would be less than significant, ~~and impacts would be~~ similar to the project.

6.5.2.3 Air Quality

Alternative 2 would introduce all of the same uses as those that would occur under the project, but at an increased intensity. This would result in increased construction and operational activity compared to the project. As such, ~~while~~although maximum daily pollutant emissions related to construction activities and new vehicular trips ~~under~~during operations may still be lower than thresholds and ~~would~~ result in less-than-significant impacts, pollutant emissions under Alternative 2 would ~~be increased~~increase compared to the project. In addition, Alternative 2 would also include equestrian staging areas, which would have the potential to generate new sources of odors and ~~would~~ require implementation of mitigation (**MM-AQ-1**) to reduce these impacts to less-than-significant levels. Therefore, ~~while~~although Alternative 2 may still result in less-than-significant impacts related to air quality, this alternative ~~has~~would have the potential to result in greater pollutant emissions than the project, and air quality impacts would be slightly greater compared to the project.

6.5.2.4 Biological Resources

Alternative 2 would involve construction activities at the project site, including ground-disturbing activities that would result in the removal of native vegetation. As such, similar to the project, this alternative has the potential to adversely affect biological resources, including Quino checkerspot butterfly (QCB) habitat, decumbent goldenbush, Engelmann oaks, western spadefoot, special-status reptile species, special-status avian species and Migratory Bird Treaty Act (MBTA)-protected birds, breeding burrowing owl, raptor foraging habitat, pallid special-status bats, bat maternal roost sites, special-status mammals, and sensitive natural communities. Mitigation measures, including **MM-BIO-1** through **MM-BIO-106**, and **APM-BIO-1** would be required to reduce these impacts to less-than-significant levels. However, because Alternative 2 would include night lighting, which would not be consistent with land use adjacency guidelines associated with the County's MSCP, it is anticipated that Alternative 2 would result in a significant and unavoidable impact related to a lack of consistency with an adopted Habitat Conservation Plan/Natural Community Conservation Plan.

Because this alternative would result in a greater area of development (up to 50 acres) and ~~would~~ introduce stadium lighting to an undeveloped site ~~that is~~ adjacent to MSCP preserve lands, this alternative would result in substantially greater impacts on biological resources ~~when~~ compared to the project. It is ~~also~~ unlikely that there would be ~~sufficient enough~~ remaining open space to provide adequate ~~onsite~~on-site mitigation for impacts on sensitive natural communities, ~~thereby~~ requiring additional ~~offsite~~off-site mitigation than proposed under the project.

6.5.2.5 Cultural Resources

Similar to the project, Alternative 2 would result in ground-disturbing activities that would have the potential to unearth and damage significant archaeological resources during construction. Mitigation would reduce these impacts to less-than-significant levels (**MM-CUL-1** through **MM-CUL-3**); however, because the area of disturbance would be greater under this alternative, impacts would be slightly greater compared to the project.

6.5.2.6 Energy

Alternative 2 would involve construction of a 50-acre active recreational park, with 46.6 acres remaining as a conservation area. Alternative 2 would involve a larger park ~~covering a greater that~~ would cover more acreage. Therefore, Alternative 2 would result in more intensive construction and operational activities than the project, ~~and impacts.~~ Impacts related to energy would be slightly greater compared to the project.

6.5.2.7 Geology and Soils

Similar to the project, Alternative 2 would result in ground-disturbing activities that would have the potential to unearth and damage significant paleontological resources during construction. Mitigation would reduce these impacts to less-than-significant levels (**MM-GEO-1**); however, because the area of disturbance would be greater under this alternative, impacts on geology and soils would be slightly greater compared to the project.

6.5.2.8 Greenhouse Gas Emissions

Similar to the project, construction activities occurring during implementation of Alternative 2 would have the potential to conflict with the County's 2018 CAP, specifically the requirement to use alternative fuels in 100% percent of construction equipment by 2030. Mitigation measure **MM-GHG-1** would be required to reduce this impact to less-than-significant levels. Additional GHG emissions are anticipated to occur during operation, given that multiple sports tournaments could occur at one time with Alternative 2. These operational emissions are anticipated to exceed the screening level and ~~could~~ result in significant unavoidable impacts related to GHG emissions. Because this alternative would result in greater operational GHG emissions that could exceed screening thresholds, this alternative would result in substantially greater impacts related to GHG emissions ~~when~~ compared to the project.

6.5.2.9 Hazards and Hazardous Materials

Similar to the project, Alternative 2 would involve construction activities, including ground-disturbing activities, that could result in the release of contaminated soil into the environment. Mitigation measures **MM-HAZ-1** would reduce these impacts to less-than-significant levels.

However, because Alternative 2 would disturb a greater area of soil, Alternative 2 would result in slightly greater impacts related to hazards and hazardous materials compared to the project.

6.5.2.10 Hydrology and Water Quality

Similar to the project, Alternative 2 would comply with ~~requirements, including best management practices (BMPs) required by and~~ the County's Jurisdictional Runoff Management Plan (JRMP) and ~~BMP Design Manual and the implementation of~~. It would also implement a Stormwater Pollution Prevention Plan (SWPPP), as required by the General Construction Permit. Compliance with these regulations would ensure that construction activities would not substantially degrade water quality. In addition, during operation, the County would require ~~the development of a Stormwater Quality Management Plan (SWQMP) to guarantee that effective~~ Low-Impact Development/low-impact development (LID) features and BMPs are implemented ~~to ensure that and~~ stormwater runoff ~~during operational activities~~ would not degrade water quality. ~~While~~ Although Alternative 2 has the potential to result in a larger amount of impervious surface area than would occur under the project, this alternative would include landscaped areas, berms, and stormwater retention basins that would allow for continued groundwater recharge. Therefore, overall, Alternative 2 would result in less-than-significant impacts related to hydrology and water quality, similar to the project.

6.5.2.11 Land Use and Planning

Similar to the project, Alternative 2 would not physically divide an established community. In addition, Alternative 2 would be consistent with the zoning and land use designation for the project site ~~and would be consistent with~~ as well as plans, policies, and regulations adopted for the purposes of avoiding or mitigating an environmental effect. Therefore, impacts related to land use and planning occurring under Alternative 2 would be less than significant ~~and would be~~, similar to the project.

6.5.2.12 Mineral Resources

The project site does not contain mineral deposits or active mines ~~and; therefore, Alternative 2~~ would not result in the loss of locally important mineral resources. ~~Therefore, development of~~ Development under Alternative 2 would result in less-than-significant impacts related to mineral resources, similar to the project.

6.5.2.13 Noise and Vibration

Overall, because Alternative 2 would involve a similar use, including ~~similar~~ construction and operational activities, ~~as similar to those of the project,~~ the same types of noise would occur at the project site under Alternative 2, ~~including~~. This includes construction noise associated with the installation of a sewer system and operational noise associated with traffic, athletic fields, skate parks, dogs barking, and balls on the pickleball and basketball courts. These impacts would be reduced ~~with the to less-than-significant levels with~~ implementation of **MM-NOI-1**, **MM-NOI-2**, and **MM-NOI-3** ~~to less-than-significant levels~~. However, because Alternative 2 would increase the area for active recreational activities, including activities within the athletic fields, ~~these~~ such activities would be allowed to continue later into the evening hours (but, per **MM-NOI-3**, would not extend beyond 10 p.m.). Given the extended hours and additional noise that could be generated by multiple ~~concurrent~~ sporting events occurring at one time, it is possible that the increase in operational noise levels associated with Alternative 2 could result in significant impacts on sensitive receptors within

the community (residences) and sensitive receptors within the adjacent biological open space areas. Because this alternative would result in a greater area of development and would substantially increase operational noise levels, this alternative would result in substantially greater impacts related to noise ~~when~~ compared to the project.

6.5.2.14 Population and Housing

Similar to the project, the introduction of a new park under Alternative 2 would not induce ~~any~~ population growth or displace people or housing. Alternative 2 would ~~also~~ include a septic system or ~~an extension of~~ the existing sewer system to serve restroom facilities, an administration facility/ranger station, and a volunteer pad. However, the extension of the sewer line would ~~only~~ serve only the project site. Alternative 2 would result in less-than-significant impacts related to population and housing, ~~and impacts would be similar to the project.~~

6.5.2.15 Public Services

As with the project, Alternative 2 would increase demand for fire and police services. However, as discussed in Section 4.15, *Public Services*, construction and operation of the park is not expected to require new or physically altered government facilities to maintain acceptable service ratios for fire protection or police services. ~~While~~ Although Alternative 2 would ~~be larger than~~ increase demand compared with the project, it is ~~similarly~~ not expected that it would require new or physically altered government facilities in order to maintain acceptable services. Impacts would be less than significant ~~and would be~~, similar to the project.

6.5.2.16 Recreation

Similar to the project, Alternative 2 would provide new park and recreational opportunities for the community of Alpine, which is currently deficient ~~in with respect to~~ park and recreational space ~~and~~. In addition, it would help reduce demand on for other existing recreational facilities. ~~In addition, construction~~ Construction of Alternative 2 would not result in any additional significant environmental impacts beyond those already identified in ~~this~~ EIR. Alternative 2 would have less-than-significant impacts related to recreation, similar to the project.

6.5.2.17 Transportation and Circulation

As discussed in Section 4.17, *Transportation and Circulation*, construction and operation of the project would not have a detrimental effect on the level of service ~~of project area roadways and~~. The project would be consistent with local policies governing levels of service. ~~In addition, because~~ Alternative 2 would fall under the local ~~serving~~ public facilities category, it is presumed ~~to that it would have a less-than-significant impact related to vehicle miles traveled (VMT) impact.~~ Alternative 2 would ~~also include~~ have a similar site design such that similar to that of the project: therefore, a hazardous roadway condition would not occur and adequate emergency access would be provided. However, Alternative 2 would increase the size of the active recreational ~~uses in the~~ area, which could allow ~~for~~ multiple large-scale sporting events to occur at one time. This increase could be large enough to result in detrimental effects on roadway levels of service in the area. Because this alternative could cause detrimental effects on roadway levels of service, ~~this alternative would~~ it could result in substantially greater impacts related to transportation and circulation ~~when~~ compared to the project.

6.5.2.18 Tribal Cultural Resources

Similar to the project, Alternative 2 would result in ground-disturbing activities that would have the potential to unearth and damage significant tribal cultural resources during construction. Mitigation would reduce these impacts to less-than-significant levels (**MM-CUL-1** through **MM-CUL-3**, **MM-TCR-1**, and **MM-TCR-2**); however, because the area of disturbance would be larger under this alternative, impacts would be slightly greater compared to the project.

6.5.2.19 Utilities and Service Systems

Alternative 2 would result in a larger area ~~off~~for active recreational uses than would occur under the project. As such, Alternative 2 would have a greater demand on water supply and could also require new or expanded water facilities to serve the project site. With implementation of **MM-UTIL-1** and **MM-UTIL-2**, these impacts would be reduced to a less-than-significant level. Because Alternative 2 would require a larger water supply ~~demand~~for irrigation ~~than the project~~, impacts under this alternative would be greater than under the project.

6.5.2.20 Wildfire Hazards

Similar to the project, Alternative 2 would be required to comply with rules established under ~~San Diego~~the County Code of Regulatory Ordinances ~~that, which~~ would help reduce risks associated with fire. In addition, Alternative 2 would include a Site Evacuation Plan that would identify emergency contact information, evacuation routes and established meeting places, and a safety protocol to ensure the safe evacuation of visitors and employees of the park. Because Alternative 2 ~~has~~would have the potential to bring more people to the project site than the project, impacts under this alternative would be greater compared to the project.

6.5.2.21 Relationship to Project Objectives

~~Due to~~Because of the larger size and ~~the intent of accommodating to accommodate~~ organized team sports, Alternative 2 would result in slightly increased impacts related to the majority of the resources, including air quality, biological resources, cultural resources, energy, geology and soils, GHG emissions, hazards and hazardous materials, noise, transportation and circulation, tribal cultural resources, utilities and service systems, and wildfire. Alternative 2 would result in similar impacts related to agriculture and forestry resources, hydrology and water quality, land use and planning, mineral resources, population and housing, public services, and recreation. ~~Due to~~Because of the addition of nighttime sports field lighting of sports fields, Alternative 2 would result in substantially greater impacts related to aesthetics and visual resources. However, Alternative 2 would meet all of the project objectives because it would create a community gathering place, enhancing the quality ~~and~~of life and public health of the community; and accommodating a variety of active and passive recreational uses; ~~and while~~although it would not provide as much ~~conservation/open space/~~preserve area as the project, it would still accommodate the objective of preserving natural and cultural resources through the provision of 46.6 acres of conservation area.

Objective 1: Create a place where all Alpine residents can gather and connect as a community.

The County General Plan Conservation and Open Space Element includes Goal LU-18, which encourages the development of civic uses that enhance community centers and places (County

General Plan, p. 3-46). The proposed project and Alternative 2 would meet this goal of providing the community with a new location to gather and connect. In addition, the County General Plan Environmental Justice Element includes Goal EJ-13, which aims to expand access to parks, recreation facilities, and other safe places for community members to be active (County General Plan, p. 9-47). The proposed project and Alternative 2 would be consistent with this goal because they would both provide a space for the community to be active or congregate.

Objective 2: Anticipate, accommodate, and manage a variety of active and passive recreational uses and open space/preserve lands that benefit all members of the Alpine community, both now and in the future.

The County General Plan Conservation and Open Space Element includes Goal COS-21, which aims to provide park and recreation facilities that enhance the quality of life and meet the diverse active and passive recreational needs of county residents and visitors, protect natural resources, and foster an awareness of local history, with approximately 10 acres of local parks and 15 acres of regional parks provided for every 1,000 persons in the unincorporated County. Policy COS-21.1 Diversity of Users and Services, calls for providing parks and recreation facilities that create opportunities for a broad range of recreational experiences to serve user interests. Although there are adjacent passive parks and some smaller active parks in the vicinity, the County's goal is to provide active and passive park opportunities to all local citizens that are usable by all age groups and all abilities. There are private parks, but they are not available to all citizens within Alpine, which is contrary to the goal for the County. The proposed project and Alternative 2 would both provide these facilities and meet the objectives of Policy 21.1. In addition, according to the County Parks Master Plan, the Alpine CPA population density is projected to increase by 61 percent in the central Alpine CPA by 2040 (County Parks Master Plan, p. 53). As a result, the demand for parks and recreational services will increase substantially over the coming years. Because the community already has a deficit with respect to parkland, with only 1.83 acres per person, this will place greater demand on existing facilities. The proposed project and Alternative 2 would address these concerns and contribute to responsibly furthering the region's growth.

Objective 3: Provide for long-term natural and cultural resource management consistent with the goals and objectives of the MSCP for the preserve portion of the property.

Both the proposed project and Alternative 2 would be compatible with the objective of providing for long-term natural and cultural resource management consistent with the goals and objectives of the MSCP for the preserve portion of the property. However, with the proposed project, a larger portion of the site would be preserved. Both the proposed project and Alternative 2 would have a volunteer living on-site as well as park rangers patrolling the area daily for both the park and preserve.

The proposed project and Alternative 2 would have designated trails with trash cans that would be emptied daily to prevent trash from accumulating; therefore, staff would be on-site daily. The designated parking area of the proposed project and Alternative 2, with staff on-site, would prevent the public from parking in sensitive habitat and thereby potentially negatively affecting natural and cultural resources. In addition, the proposed project and Alternative 2 would include native grassland restoration that would benefit QCB habitat through the removal of non-native invasive species and create breeding pools for western spadefoots, which would expand the existing breeding population from Wright's Field.

Objective 4: Design a community park that integrates and, where feasible, preserves natural features into the park design.

The County General Plan Land Use Element includes Goal LU-6, which aims to balance the built environment with the natural environment, scarce resources, natural hazards, and the unique local character of individual communities (County General Plan, p. 3-29). Policy LU-6.6, Integration of Natural Features into Project Design, requires incorporation of natural features, including mature oaks, indigenous trees, and rock formations, into proposed development and avoidance of sensitive environmental resources. In the northern portion of the project site, in areas where the equestrian facilities would be developed, groves of oaks would remain in place; development, as well as new landscaping, would be situated around the trees. Both the proposed project and Alternative 2 would have a community park that would meet this objective.

Objective 5: Enhance the quality of life in Alpine by providing exceptional park and recreational opportunities that improve health and wellness while preserving significant natural and cultural resources.

The County General Plan Conservation and Open Space Element includes Goal COS-22, which aims to provide high-quality parks and recreational programs that promote the health and well-being of County residents while meeting the needs of a diverse and growing population (County General Plan, p. 5-40). The proposed project and Alternative 2 would achieve this goal by providing Alpine with a multitude of recreational opportunities. Policy COS-22.1, Variety of Recreational Programs, also seeks to promote both active and passive recreational facilities (County General Plan, p. 5-41).

Under the proposed project and Alternative 2, programs at the park would be established according to recommendations from local residents and the many amenities that would exist on site. For example, more active older adults may enjoy hiking or biking along trails, working out at fitness stations, or taking an instructor-led Yoga or Zumba class. Less active older adults may enjoy working with plants in the community garden, reading a book on a shaded park bench, or socializing at the dog park. The proposed project and Alternative 2 would support these programs, and given the lack of suitable parkland in Alpine, it is unlikely that the community would be provided with these enrichment programs elsewhere. In addition, daily ranger presence would be established under the proposed project and Alternative 2. Both the proposed project and Alternative 2 would provide regular park programs, classes, and events held by rangers on County properties to teach visitors about the land and local wildlife, area history, and the importance of park stewardship.

Live Well San Diego is the County's vision for addressing long-standing inequities and disparities through key interventions, programs, and services in communities that face barriers to achieving outcomes for building better health. It aligns the efforts of individuals, organizations, and government to help county residents live well and includes specific strategies to track outcomes related to health, wellness, and equity. The Live Well San Diego CHA is a systematic examination of the health status indicators for the population of San Diego County and used to identify key assets, trends, and challenges in a community. The purpose is to provide data and information to inform community health planning efforts. The County's HHSA divides the county into six regions to analyze under the CHA. Alpine is located in the East County region.

Live Well San Diego establishes community health indicators related to the built environment, including the percentage of the population living within 0.25 mile of a park. Access to parks and recreation services has been shown to have positive health impacts, including the physical, social, and mental aspects of health and well-being for community members. Parks and open spaces help

to reduce chronic diseases, improve mental health, foster community connections, and encourage physical activity. According to the CHA, only 18.5 percent of Alpine's population lives within 0.25 mile of a park or community space compared to the East County population average of 53.3 percent and 61.5 percent countywide. Alpine has one of the lowest percentages of the population living within 0.25 mile of a park or community space in East County (CHA 2019–2021, p. 208). As a community with a deficit of parkland, Alpine would greatly benefit from the addition of an active park, which the proposed project and Alternative 2 would provide.

According to Live Well San Diego, the recommended level of physical activity for adults is a total of 150 minutes of moderate activity every week. In 2015, 8.8 percent of adult San Diegans had been diagnosed with heart disease. The region with the highest percentage of residents who had ever been diagnosed with heart disease was East County, at 12.1 percent (CHA 2019–2021, p. 33). The addition of active parkland and recreational spaces would provide the community with a well-maintained, up-to-date, safe, and inviting activity space with much-needed facilities and programs to promote physical activity and contribute to other positive health benefits.

The County General Plan Environmental Justice Element includes Goal EJ-11, which strives to increase physical activity resources and programs to reduce rates of obesity, heart disease, diabetes, and other health-related illnesses for residents of all ages, cultural backgrounds, and abilities in the county. Policy EJ-11.5, Community Engagement, encourages partnering with community-based organizations to create appropriate and relevant programming and support improvements to natural and built-environment placemaking that promote physical activity and recreation (County General Plan, p. 9-46). Both the proposed project and Alternative 2 would help the County achieve these policy objectives or make progress toward enhancing the health and wellness of the community.

Objective 6: Protect public health and safety by incorporating Crime Prevention Through Environmental Design and other safety measures into the park design.

The proposed project and Alternative 2 would protect the public health and safety by acting as a temporary safe refuge area and staging area for the Alpine FPD should a fire occur in Alpine. The proposed project and Alternative 2 would provide a four-way stop to slow down traffic on South Grade Road, in addition to adding crosswalks and a walking path for the public. There would also be active monitoring by rangers daily and a volunteer living on-site to protect the area from crime under both the proposed project and Alternative 2.

Objective 7: Manage Alpine County Park consistent with County DPR's missions, policies, directives, and applicable laws and regulations.

The Alpine community currently has no County parks and only 1.83 acres of parkland per 1,000 residents, which is less than the County General Plan goal of 10 acres of parkland per 1,000 residents. Alpine does not have adequate parkland to meet the recreational needs of the community, and there is a significant shortage of sports fields and other recreational amenities, as noted in the County's Parks Master Plan. Although there are some privately managed recreational spaces, which are operated under joint use agreements or as non-profit facilities, there are currently no County-managed public parks for Alpine residents. The project would provide an opportunity to develop a portion of the property as an active park and conserve a substantial portion as open space. The 98 acres would bring the DPR closer to reaching park-per-resident goals. The roughly 25 acres within the parcel that are dedicated to active recreation offer enough space to provide a diverse mix of opportunities, ensuring options for residents of all ages, abilities,

and interests. In addition, according to the County Parks Master Plan, population density is projected to increase by 61 percent in the central Alpine CPA by 2040 (County Parks Master Plan, p. 53). As a result, the demand for parks and recreational services will increase substantially over the coming years. Because the community already has a deficit of parkland, with only 1.83 acres per person, this will place greater demand on existing facilities. The proposed project and Alternative 2 would address these concerns and contribute to responsibly furthering the region's growth.

Objective 8: Reflect Alpine community's heritage through inclusion of architectural elements that reflect the rural nature of Alpine.

The proposed project would be consistent with County General Plan Conservation and Open Space Element Goal COS-11.3, which requires development within visually sensitive areas to minimize visual impacts and preserve unique or special visual features, particularly in rural areas, through creative site planning; integration of natural features into the project; appropriate scale, materials, and design to complement the surrounding natural landscape; and minimal disturbance of topography. The proposed project would meet this objective better than Alternative 2.

6.5.3 Analysis of Alternative 3 – Reconfigured Project Alternative

6.5.3.1 Aesthetics and Visual Resources

The ~~existing~~ project site consists of undeveloped, ~~vegetated~~ rural land ~~and the~~ with vegetation. The visual character is defined by open, rural, and undisturbed natural features. Under Alternative 3, a similarly sized community park would be developed at the project site; however, this alternative would include adjustments to the site plan, including removal of the bike and skate parks and the relocation of the parking areas farther into the interior of the site, ~~while~~; the periphery would remain landscaped with native vegetation and have a walking path. ~~While~~ Although the visual character of the site would still be altered under this alternative, the removal of the berm, the relocation of the parking area, and the maintenance of native vegetation along the exterior would help reduce aesthetic impacts and maintain some of the more rural character of the site. Therefore, impacts related to aesthetics and visual resources would be reduced under Alternative 3 compared to the project.

6.5.3.2 Agriculture and Forestry Resources

Alternative 3 would result in the development of the project site from an undeveloped site to a site with a community park. However, ~~while~~ although a portion of the project site is mapped as Farmland of Local Importance, the site is currently not used for agriculture and does not contain agricultural resources that meet the Prime and Statewide soil criteria. The project site does not contain lands zoned for ~~forest land~~ forestland or timberland. Under Alternative 3, impacts on agriculture or forestry resources would be less than significant, ~~and impacts would be similar to the project.~~

6.5.3.3 Air Quality

Alternative 3 would introduce most of the same uses as those that would occur under the project but would eliminate the bike and skate park. This would result in ~~similar~~ construction and operational activity compared similar to that of the project. As such, maximum daily pollutant emissions related

to construction activities and new vehicular trips would not exceed the thresholds ~~and would result, resulting~~ in less-than-significant impacts. In addition, Alternative 3 would also include equestrian staging areas, which would have the potential to generate new sources of odors and ~~would~~ require implementation of mitigation (**MM-AQ-1**) to reduce ~~these~~ impacts to less-than-significant levels. Overall, Alternative 3 would result in ~~similar~~ impacts related to air quality ~~assimilar to those of~~ the project.

6.5.3.4 Biological Resources

Alternative 3 would involve construction activities at the project site, including ground-disturbing activities that would result in the removal of native vegetation. As such, similar to the project, this alternative ~~has~~would have the potential to adversely affect biological resources, including QCB habitat, decumbent goldenbush, Engelmann oaks, western spadefoot, special-status reptile species, special-status avian species, and MBTA-protected birds, breeding burrowing owl, raptor foraging habitat, special-status pallid bats, bat maternal roost sites, special-status mammals, and sensitive natural communities. Mitigation measures, including **MM-BIO-1** through **MM-BIO-106**, and **APM-BIO-1** would be required to reduce these impacts to less-than-significant levels. Alternative 3 would be located ~~south of the project~~ in the southern portion of the project site, adjacent to existing open space areas, ~~and has~~with the potential to disturb the same area of ground as the project. It would reduce impacts on Engelmann oaks ~~into~~ the north but ~~would~~ increase impacts on native grasslands at the southern end of the project site. Both Engelmann oak woodlands and native grasslands are Tier I habitats, ~~so, therefore,~~ no appreciable difference is anticipated with respect to impacts on Tier I habitats. The location of the revised footprint would potentially obstruct a wildlife corridor that extends south of the project site and connects with open space lands south of South Grade Road. Therefore, impacts on biological resources would be increased compared to the project.

6.5.3.5 Cultural Resources

Similar to the project, Alternative 3 would result in ground-disturbing activities, which would have the potential to unearth and damage significant archaeological resources during construction. Mitigation would reduce these impacts to less-than-significant levels (**MM-CUL-1** through **MM-CUL-3**). Overall, impacts on cultural resources under Alternative 3 would be similar to those of the project.

6.5.3.6 Energy

Alternative 3 would involve construction of a 25-acre active recreational park, with 71.6 acres remaining as conservation area. Construction and operation of Alternative 3 would involve ~~similar~~ energy consumption ~~assimilar to that of~~ the project, and, impacts would be comparable to those under the project.

6.5.3.7 Geology and Soils

Similar to the project, Alternative 3 would result in ground-disturbing activities that would have the potential to unearth and damage significant paleontological resources during construction. Mitigation would reduce these impacts to less-than-significant levels (**MM-GEO-1**). Because Alternative 3 would involve a similar area of ground-disturbance, impacts ~~related to paleontological resources on geology and soils~~ would be similar to those of the project.

6.5.3.8 Greenhouse Gas Emissions

Alternative 3 would involve similar uses as the project. As such, GHG emissions that could occur under Alternative 3 would not likely exceed the screening level and impacts related to GHG emissions would be less than significant. Overall, Alternative 3 would result in impacts related to GHG emissions similar to the project.

6.5.3.9 Hazards and Hazardous Materials

As with the project, Alternative 3 would involve construction activities, including ground-disturbing activities, that could result in the release of contaminated soil into the environment. Mitigation measure **MM-HAZ-1** would reduce this impact to a less-than-significant level. Overall, impacts related to hazards and hazardous materials under Alternative 3 would be similar to those that would occur under the project.

6.5.3.10 Hydrology and Water Quality

As with the project, Alternative 3 would comply with BMPs required by the County's JRMP and *BMP Design Manual* and the implementation of a SWPPP as required by the General Construction Permit. Compliance with these regulations would ensure that construction activities would not substantially degrade water quality. In addition, during operation, the County would require the development of an SWQMP to guarantee that effective LID features and BMPs are implemented to ensure that stormwater runoff during operational activities would not degrade water quality. Alternative 3 has the potential to result in a similar amount of impervious surface area as the project ~~and~~. It would also include landscaped areas, berms, and stormwater retention basins that would allow for ~~continued~~ groundwater recharge. Therefore, overall, Alternative 3 would result in less-than-significant impacts related to hydrology and water quality, similar to the project.

6.5.3.11 Land Use and Planning

Similar to the project, Alternative 3 would not physically divide an established community. In addition, Alternative 3 would be consistent with the zoning and land use designation for the project site ~~and would be consistent with~~ as well as plans, policies, and regulations adopted for the purposes of avoiding or mitigating an environmental effect. Therefore, impacts related to land use and planning ~~occurring under~~ Alternative 3 would be less than significant ~~and would be~~, similar to the project.

6.5.3.12 Mineral Resources

The project site does not contain mineral deposits or active mines ~~and; therefore, Alternative 3~~ would not result in the loss of locally important mineral resources. ~~Therefore,~~ ~~development~~ Development of Alternative 3 would result in less-than-significant impacts related to mineral resources, similar to the project.

6.5.3.13 Noise and Vibration

Overall, because Alternative 3 would involve a similar use, including ~~similar~~ construction and operational activities ~~as similar to those of~~ the project, the same types of noise would occur at the project site under Alternative 3, ~~including~~. This includes construction noise associated with the

installation of a sewer system and operational noise associated with traffic, athletic fields, dogs barking, and balls on the pickleball and basketball courts. Alternative 3 would not include the skate and bike parks, which would eliminate noise produced from those sources. However, because the parking lot would be moved to the interior of the site, it is possible that the pickleball and basketball courts would be moved closer to the periphery, which could increase noise from those sources ~~of noise~~ for nearby sensitive receptors. ~~These impacts would be reduced to less-than-significant levels with the implementation of MM-NOI-1, MM-NOI-2, and MM-NOI-3 to less than significant levels.~~ Overall, Alternative 3 would result in noise impacts similar to those of the project.

6.5.3.14 Population and Housing

Similar to the project, the introduction of a new park under Alternative 3 would not induce ~~any~~ population growth or displace people or housing. Alternative 3 would ~~also include a septic system or an extension of~~ to the existing sewer system to serve restroom facilities, an administration facility/ranger station, and a volunteer pad. However, the extension of the sewer line would ~~only serve only~~ the project site. Alternative 3 would result in less-than-significant impacts related to population and housing ~~and impacts would be~~, similar to the project.

6.5.3.15 Public Services

As with the project, Alternative 3 would increase demand for fire and police services. However, as discussed in Section 4.15, construction and operation of the park is not expected to require new or physically altered government facilities to maintain acceptable service ratios for fire protection or police services. Impacts would be less than significant ~~and would be~~, similar to the project.

6.5.3.16 Recreation

Similar to the project, Alternative 3 would provide new park and recreational opportunities for the community of Alpine, which is currently deficient ~~in with respect to~~ park and recreational space ~~and~~. This would help reduce demand ~~on at~~ other existing recreational facilities. In addition, construction of Alternative 3 would not result in any additional significant environmental impacts beyond those already identified in ~~this~~ EIR. Alternative 3 would have less-than-significant impacts related to recreation, similar to the project.

6.5.3.17 Transportation and Circulation

As discussed in Section 4.17, construction and operation of the project would not have a detrimental effect on the level of service ~~of project on~~ area roadways ~~and~~. It would be consistent with local policies governing levels of service. Alternative 3 would result in ~~similarly sized a~~ project with a size similar to that of the proposed project, with similar effects on the roadway levels of service in the area. In addition, because Alternative 3 would fall under the local ~~serving~~ public facilities category, it is presumed to have a less-than-significant VMT impact. Alternative 3 would also ~~include have~~ a similar site design ~~such that~~; therefore, a hazardous roadway condition would not occur and adequate emergency access would be provided. Overall, Alternative 3 would result in impacts related to transportation and circulation similar to those ~~under of~~ the project.

6.5.3.18 Tribal Cultural Resources

Similar to the project, Alternative 3 would result in ground-disturbing activities that would have the potential to unearth and damage significant tribal cultural resources during construction. Mitigation would reduce these impacts to less-than-significant levels (**MM-CUL-1** through **MM-CUL-3**, **MM-TCR-1**, and **MM-TCR-2**). Alternative 3 would result in impacts related to tribal cultural resources similar to those of the project.

6.5.3.19 Utilities and Service Systems

Alternative 3 would result in a ~~similarly sized park as would occur under the project, and with a size similar to that of the proposed project.~~ Similar to the project, it would increase demands on the water supply and may require new or expanded water facilities to serve the project. With implementation of **MM-UTIL-1** and **MM-UTIL-2**, these impacts would be reduced to a less-than-significant level. Overall, Alternative 3 would result in impacts related to utilities and service systems that would be similar to those under the project.

6.5.3.20 Wildfire Hazards

Similar to the project, Alternative 3 would be required to comply with rules established under ~~San Diego~~ the County Code of Regulatory Ordinances ~~that, which~~ would help reduce risks associated with fire. In addition, Alternative 3 would include a Site Evacuation Plan that would identify emergency contact information, evacuation routes and established meeting places, and a safety protocol to ensure the safe evacuation of visitors and employees of the park. Overall, Alternative 3 would result in impacts related to wildfire risk that would be similar to those ~~under~~ of the project.

6.5.3.21 Relationship to Project Objectives

Alternative 3 would result in the same acreage distribution and the same uses as the project, except for the provision of a bike park and a skate park, which would be removed under this alternative. Because this alternative would provide the same uses at the same acreage, it would result in similar impacts for all resources, with the exception of aesthetics and visual resources. Impacts related to aesthetics and visual resources would be slightly reduced under this alternative ~~due to the removal of~~ because the landscaped berm along the South Grade Road frontage ~~would be removed~~ and the relocation of the parking lot ~~to~~ would be relocated to an area farther into the interior of the project site. This adjustment would maintain natural vegetation along the roadway, which would help reduce the degradation of visual character at the project site. Because this alternative would provide most of the same uses as the project, including preserving 71.6 acres of conservation area, it would meet all of the project objectives.

Objective 1: Create a place where all Alpine residents can gather and connect as a community.

The County General Plan Conservation and Open Space Element includes Goal LU-18, which encourages the development of civic uses that enhance community centers and places (County General Plan, p. 3-46). The proposed project and Alternative 3 would meet this goal of providing the community with a new location to gather and connect. In addition, the County General Plan Environmental Justice Element includes goal EJ-13, which aims to expand access to parks, recreational facilities, and other safe places for community members to be active (County General Plan, p. 9-47). The proposed project and Alternative 3 would be consistent with this goal because they would both provide a space for the community to be active or congregate. However, the

proposed project would provide additional areas for the public to be active because it would include a bike park and skate park.

Objective 2: Anticipate, accommodate, and manage a variety of active and passive recreational uses and open space preserve that benefit all members of the Alpine community, both now and in the future.

The County General Plan Conservation and Open Space Element includes Goal COS-21, which aims to provide park and recreation facilities that enhance the quality of life and meet the diverse active and passive recreational needs of county residents and visitors, protect natural resources, and foster an awareness of local history, with approximately 10 acres of local parks and 15 acres of regional parks provided for every 1,000 persons in the unincorporated County. Policy COS-21.1, Diversity of Users and Services, calls for providing parks and recreational facilities that create opportunities for a broad range of recreational experiences to serve user interests. Although there are adjacent passive parks and some smaller active parks in the vicinity, the County's goal is to provide active and passive park opportunities to all local citizens that are usable by all age groups and all abilities. There are private parks in the vicinity, but they are not available to all citizens within Alpine, which is contrary to the goal for the County. The proposed project and Alternative 3 would both provide these facilities and meet the objectives of Policy 21.1. However, the proposed project would provide additional areas for the public to be active because it would include a bike park and skate park. In addition, according to the County Parks Master Plan, population density is projected to increase by 61 percent in the central Alpine CPA by 2040 (County Parks Master Plan, p. 53). As a result, the demand for parks and recreational services will increase substantially over the coming years. Because the community already has a deficit with respect to parkland, with only 1.83 acres per person, this will place greater demand on existing facilities. The proposed project and Alternative 3 would address these concerns and contribute to responsibly furthering the region's growth.

Objective 3: Provide for long-term natural and cultural resource management consistent with the goals and objectives of the MSCP for the preserve portion of the property.

Both the proposed project and Alternative 3 would be compatible with the objective of providing for long-term natural and cultural resource management consistent with the goals and objectives of the MSCP for the preserve portion of the property. Both the proposed project and Alternative 3 would have a volunteer living on-site as well as park rangers patrolling the area daily for both the park and preserve.

The proposed project and Alternative 3 would have designated trails with trash cans that would be emptied daily to prevent trash from accumulating; therefore, staff would be on-site daily. The designated parking area of the proposed project and Alternative 3, with staff on-site, would prevent the public from parking within sensitive habitat and thereby potentially negatively affecting natural and cultural resources. In addition, the proposed project and Alternative 3 would include native grassland restoration that would benefit QCB habitat through the removal of non-native invasive species and create breeding pools for western spadefoots, which would expand the existing breeding population from Wright's Field.

Objective 4: Design a community park that integrates and, where feasible, preserves natural features into the park design.

The County General Plan Land Use Element includes Goal LU-6, which aims to balance the built environment with the natural environment, scarce resources, natural hazards, and unique local

character of individual communities (County General Plan, p. 3-29). Policy LU-6.6, Integration of Natural Features into Project Design, requires incorporation of natural features, including mature oaks, indigenous trees, and rock formations, into proposed development and avoidance of sensitive environmental resources. In the northern portion of the project site, in areas where the equestrian facilities would be developed, groves of oaks would remain in place; development, as well as new landscaping, would be situated around the trees. Impacts related to aesthetics and visual resources would be slightly reduced under Alternative 3 with removal of the landscaped berm along the South Grade Road frontage and relocation of the parking lot to an area farther into the interior of the project site. Both the proposed project and Alternative 3 would have a community park that would meet this objective.

Objective 5: Enhance the quality of life in Alpine by providing exceptional park and recreation opportunities that improve health and wellness while preserving significant natural and cultural resources.

The County General Plan Conservation and Open Space Element includes Goal COS-22, which aims to provide high-quality parks and recreational programs that promote the health and well-being of county residents while meeting the needs of a diverse and growing population (County General Plan, p. 5-40). The proposed project and Alternative 3 would achieve this goal by providing Alpine with a multitude of recreational opportunities. Policy COS-22.1, Variety of Recreational Programs, also seeks to promote both active and passive recreational facilities (County General Plan, p. 5-41).

Under the proposed project and Alternative 3, programs at the park would be established according to on recommendations from local residents and the many amenities that would exist on site. For example, more active older adults may enjoy hiking or biking along trails, working out at fitness stations, or taking an instructor-led Yoga or Zumba class. Less active older adults may enjoy working with plants in the community garden, reading a book on a shaded park bench, or socializing at the dog park. The proposed project and Alternative 3 would support these programs, and given the lack of suitable parkland in Alpine, it is unlikely that the community would be provided with these enrichment programs elsewhere. In addition, daily ranger presence would be established under the proposed project and Alternative 3. Both the proposed project and Alternative 3 would provide regular park programs, classes, and events held by rangers on County properties to teach visitors about the land and local wildlife, area history, and the importance of park stewardship.

Live Well San Diego is the County's vision for addressing long-standing inequities and disparities through key interventions, programs, and services in communities that face barriers to achieving outcomes for building better health. It aligns the efforts of individuals, organizations, and government to help county residents live well and includes specific strategies to track outcomes related to health, wellness, and equity. The Live Well San Diego CHA is a systematic examination of the health status indicators for the population of San Diego County and used to identify key assets, trends, and challenges in a community. The purpose is to provide data and information to inform community health planning efforts. The County's HHS divides the county into six regions to analyze under the CHA. Alpine is located in the East County region.

Live Well San Diego establishes community health indicators related to the built environment, including the percentage of the population living within 0.25 mile of a park. Access to parks and recreational services has been shown to have positive health impacts, including the physical, social, and mental aspects of health and well-being for community members. Parks and open

spaces help to reduce chronic diseases, improve mental health, foster community connections, and encourage physical activity. According to the CHA, only 18.5 percent of Alpine's population lives within 0.25 mile of a park or community space compared to the East County population average of 53.3 percent and 61.5 percent countywide. Alpine has one of the lowest percentages of the population living within 0.25 mile of a park or community space in East County (CHA 2019–2021, p. 208). As a community with a deficit of parkland, Alpine would greatly benefit from the addition of an active park, which the proposed project and Alternative 3 would provide.

According to Live Well San Diego, the recommended level of physical activity for adults is a total of 150 minutes of moderate activity every week. In 2015, 8.8 percent of adult San Diegans had been diagnosed with heart disease. The region with the highest percentage of residents who had ever been diagnosed with heart disease was East County, at 12.1 percent (CHA 2019–2021, p. 33). The addition of active parkland and recreational spaces would provide the community with a well-maintained, up-to-date, safe, and inviting activity space with much-needed facilities and programs to promote physical activity and contribute to other positive health benefits.

The County General Plan Environmental Justice Element includes Goal EJ-11, which strives to increase physical activity resources and programs to reduce rates of obesity, heart disease, diabetes, and other health-related illnesses for residents of all ages, cultural backgrounds, and abilities in the county. Policy EJ-11.5, Community Engagement, encourages partnering with community-based organizations to create appropriate and relevant programming and support improvements to natural and built-environment placemaking that promote physical activity and recreation (County General Plan, p. 9-46). Both the proposed project and Alternative 3 would help the County achieve these policy objectives or make progress toward enhancing the health and wellness of the community.

Objective 6: Protect public health and safety by incorporating Crime Prevention Through Environmental Design and other safety measures into the park design.

The proposed project and Alternative 3 would protect the public health and safety by acting as a temporary safe refuge area and staging area for the Alpine FPD should a fire occur in Alpine. The proposed project and Alternative 3 would provide a four-way stop to slow down traffic on South Grade Road, in addition to adding crosswalks and a walking path for the public. There would also be active monitoring by rangers daily and a volunteer living on-site to protect the area from crime under both the proposed project and Alternative 3.

Objective 7: Manage Alpine County Park consistent with County DPR's missions, policies, directives, and applicable laws and regulations.

The Alpine community currently has no County parks and only 1.83 acres of parkland per 1,000 residents, which is less than the County General Plan goal of 10 acres of parkland per 1,000 residents. Alpine does not have adequate parkland to meet the recreational needs of the community, and there is a significant shortage of sports fields and other recreational amenities, as noted in the County's Parks Master Plan. Although there are some privately managed recreational spaces, which are operated under joint use agreements or as non-profit facilities, there are currently no County-managed public parks for Alpine residents. The project would provide an opportunity to develop a portion of the property as an active park and conserve a substantial portion of the property as open space. The 98 acres would bring DPR closer to reaching park-per-resident goals. The roughly 25 acres within the parcel that are dedicated to active recreation offer enough space to provide a diverse mix of opportunities, ensuring options

for residents of all ages, abilities, and interests. In addition, according to the County Parks Master Plan, population density is projected to increase by 61 percent in the central Alpine CPA by 2040 (County Parks Master Plan, p. 53). As a result, the demand for parks and recreational services will increase substantially over the coming years. Because the community already has a deficit with respect to parkland, with only 1.83 acres per person, this will place greater demand on existing facilities. The proposed project and Alternative 3 would address these concerns and contribute to responsibly furthering the region's growth.

Objective 8: Reflect Alpine community's heritage through inclusion of architectural elements that reflect the rural nature of Alpine.

The proposed project would be consistent with County General Plan Conservation and Open Space Element Goal COS-11.3, which requires development within visually sensitive areas to minimize visual impacts and preserve unique or special visual features, particularly in rural areas, through creative site planning; integration of natural features into the project; appropriate scale, materials, and design to complement the surrounding natural landscape; and minimal disturbance of topography. The proposed project and Alternative 3 would meet this objective.

6.5.4 Analysis of Alternative 4 – Reduced Project Alternative

6.5.4.1 Aesthetics and Visual Resources

~~The existing~~ project site consists of undeveloped, ~~vegetated~~ rural land ~~and the~~ with vegetation. The visual character is defined by open, rural, and undisturbed natural features. Under Alternative 4, a smaller community park would be developed at the project site, ~~which would keep~~ keeping almost all uses identified for the project, except for the bike and skate parks. Under Alternative 4, more of the view of open grasslands leading to and within Wright's Field would be visible along South Grade Road. Therefore, under this alternative, visual impacts would be reduced compared to the project.

6.5.4.2 Agriculture and Forestry Resources

Alternative 4 would result in ~~the~~ development of the project site from an undeveloped site to a site with a community park. However, ~~while~~ although a portion of the project site is mapped as Farmland of Local Importance, the site is currently not used for agriculture and does not contain agricultural resources that meet the Prime and Statewide soil criteria. The project site does not contain lands zoned for ~~forest land~~ forestland or timberland. Under Alternative 4, impacts on agriculture or forestry resources would be less than significant ~~and impacts would be~~, similar to the project.

6.5.4.3 Air Quality

Alternative 4 would introduce most of the same uses as those that would occur under the project, but would eliminate the bike and skate parks. This would result in ~~similar~~ construction and operational activity ~~compared~~ similar to that of the project. As such, maximum daily pollutant emissions related to construction activities and new vehicular trips would not exceed the thresholds ~~and would result~~, resulting in less-than-significant impacts. In addition, Alternative 4 would also include equestrian staging areas, which would have the potential to generate new sources of odors and ~~would~~ require implementation of mitigation (**MM-AQ-1**) to reduce these impacts to less-than-significant levels. However, because Alternative 4 would result in a reduced footprint and activities

would be slightly less intense, impacts related to air quality would be slightly reduced compared to the project.

6.5.4.4 Biological Resources

Alternative 4 would involve construction activities at the project site, including ground-disturbing activities that would result in the removal of native vegetation. As such, similar to the project, this alternative ~~has~~would have the potential to adversely affect biological resources, including QCB habitat, decumbent goldenbush, Engelmann oaks, western spadefoot, special-status reptiles, special-status avian species~~and~~, MBTA-protected birds, breeding burrowing owl, raptor foraging habitat, pallid special-status bats, bat maternal roost sites, special-status mammals, and sensitive natural communities. Mitigation measures, including **MM-BIO-1** through **MM-BIO-106**, and **APM-BIO-1** would be required to reduce these impacts to less-than-significant levels. In addition, fewer impacts on the Valley needlegrass grasslands would occur under this ~~project~~ alternative, which would reduce the amount of ~~off-site~~off-site mitigation required for Tier I habitats ~~under the preferred alternative~~. Furthermore, impacts on occupied QCB habitat and QCB host plants would occur under this alternative. Because Alternative 4 would result in less ground disturbance than the project, especially in the sensitive habitats on the southern portion of the property, impacts on biological resources would be reduced compared to the project.

6.5.4.5 Cultural Resources

Similar to the project, Alternative 4 would result in ground-disturbing activities that would have the potential to unearth and damage significant archaeological resources during construction. Mitigation would reduce these impacts to less-than-significant levels (**MM-CUL-1** through **MM-CUL-3**). However, because Alternative 4 would result in less ground disturbance than the project, impacts on cultural resources under Alternative 4 would be slightly reduced compared to the project.

6.5.4.6 Energy

Alternative 4 would involve construction of a 20-acre active recreational park, with 76.6 acres remaining as conservation area. Because Alternative 4 would involve a smaller active recreational area, there would be a reduced amount of energy consumption. Overall, impacts related to energy would be slightly reduced under Alternative 4 compared to the project.

6.5.4.7 Geology and Soils

Similar to the project, Alternative 4 would result in ground-disturbing activities that would have the potential to unearth and damage significant paleontological resources during construction. Mitigation would reduce these impacts to less-than-significant levels (**MM-GEO-1**). Because Alternative 4 would involve a smaller area of ground-disturbance, impacts ~~related to paleontological resources~~on geology and soils would be slightly reduced compared to the project.

6.5.4.8 Greenhouse Gas Emissions

Because Alternative 4 would involve uses similar ~~uses as to those of~~ the project, GHG emissions that could occur under Alternative 4 would not exceed the screening level, and impacts related to GHG emissions would be less than significant. Overall, because Alternative 4 would result in a smaller

park than the project, impacts related to GHG emissions would be slightly reduced compared to the project.

6.5.4.9 Hazards and Hazardous Materials

Similar to the project, Alternative 4 would involve construction activities, including ground-disturbing activities, that could result in the release of contaminated soil into the environment. ~~Mitigation measure MM-HAZ-1~~ would reduce this impact to a less-than-significant level. However, because Alternative 4 would result in a smaller overall park, impacts related to hazards and hazardous materials would be slightly reduced compared to those that would occur under the project.

6.5.4.10 Hydrology and Water Quality

Similar to the project, Alternative 4 would comply with BMPs required by the County's JRMP and *BMP Design Manual* ~~and the implementation of~~. ~~It would also implement~~ a SWPPP, as required by the General Construction Permit. Compliance with these regulations would ensure that construction activities would not substantially degrade water quality. In addition, during operation, the County would require ~~the development of an SWQMP to guarantee that effective LID features and BMPs are~~ would be implemented to ensure, ensuring that stormwater runoff during operational activities would not degrade water quality. Because Alternative 4 would eliminate the bike and skate parks and ~~would~~ increase the area for community gardens and picnics, this alternative would involve a smaller amount of impervious surface area than the project ~~and~~. ~~It would also include landscaped areas, berms, and stormwater retention basins that would allow for continued~~ al groundwater recharge. Impacts under Alternative 4 ~~would be less than significant~~ related to hydrology and water quality would be less than significant, and because Alternative 4 would involve a smaller project, with a smaller ~~area~~ amount of impervious ~~surfaces~~ surface area, those impacts would be slightly reduced compared to the project.

6.5.4.11 Land Use and Planning

Similar to the project, Alternative 4 would not physically divide an established community. In addition, Alternative 4 would be consistent with the zoning and land use designation for the project site and ~~would be consistent with~~ the plans, policies, and regulations adopted for the purposes of avoiding or mitigating an environmental effect. Therefore, impacts related to land use and planning ~~occurring under Alternative 4 would be less than significant and would be~~, similar to the project.

6.5.4.12 Mineral Resources

The project site does not contain mineral deposits or active mines ~~and; therefore, Alternative 4~~ would not result in the loss of locally important mineral resources. ~~Therefore, development of~~ Development under Alternative 4 would result in less-than-significant impacts related to mineral resources, similar to the project.

6.5.4.13 Noise and Vibration

Overall, because Alternative 4 would involve a similar use, including ~~similar~~ construction and operational activities ~~as similar to those of~~ the project, the same types of noise would occur at the project site under Alternative 4, including construction noise associated with the installation of a

sewer system and operational noise associated with traffic, athletic fields, dogs barking, and balls on the pickleball and basketball courts. Alternative 4 would not include the skate and bike parks, which would eliminate noise produced from those sources. These impacts would be reduced to less-than-significant levels with the implementation of **MM-NOI-1**, **MM-NOI-2**, and **MM-NOI-3** ~~to less-than-significant levels~~. Overall, Alternative 4 would result in slightly reduced noise impacts compared to the project.

6.5.4.14 Population and Housing

Similar to the project, the introduction of a new park under Alternative 4 would not induce ~~any~~ population growth or displace people or housing. Alternative 4 would ~~also~~ include a septic system or ~~an~~ extension ~~of~~ to the existing sewer system to serve restroom facilities, ~~the~~ administration facility/ranger station, and a volunteer pad. However, the extension of the sewer line would ~~only~~ serve only the project site. Alternative 4 would result in less-than-significant impacts related to population and housing, ~~and impacts would be similar to the project.~~

6.5.4.15 Public Services

As with the project, Alternative 4 would increase demand for fire and police services. However, as discussed in Section 4.15, construction and operation of the park is not expected to require new or physically altered government facilities to maintain acceptable service ratios for fire protection or police services. Impacts would be less than significant ~~and would be~~, similar to the project.

6.5.4.16 Recreation

Similar to the project, Alternative 4 would provide new park and recreational opportunities for the community of Alpine, which is currently deficient ~~in~~ with respect to park and recreational space, ~~and would~~ help reduce demand on other existing recreational facilities. In addition, construction of Alternative 4 would not result in any additional significant environmental impacts beyond those already identified in ~~this~~ EIR. Alternative 4 would result in less-than-significant impacts related to recreation, similar to the project.

6.5.4.17 Transportation and Circulation

As discussed in Section 4.17, construction and operation of the project would not have a detrimental effect on the level of service ~~of project area roadways and~~. It would be consistent with local policies governing levels of service. Alternative 4 would result in a reduced project and ~~would~~ generate less traffic than the project, which would result in reduced effects on ~~the~~ roadway levels of service in the area. In addition, because Alternative 4 would fall under the local ~~serving~~ public facilities category, it is presumed to have a less-than-significant VMT impact. Alternative 4 would also ~~include~~ have a similar site design ~~such that~~. Therefore, a hazardous roadway condition would not occur, and adequate emergency access would be provided. Overall, because Alternative 4 would result in less traffic overall, it would have slightly reduced impacts related to transportation and circulation compared to the project.

6.5.4.18 Tribal Cultural Resources

Similar to the project, Alternative 4 would result in ground-disturbing activities that would have the potential to unearth and damage significant tribal cultural resources during construction. Mitigation

would reduce these impacts to less-than-significant levels (**MM-CUL-1** through **MM-CUL-3**, **MM-TCR-1**, and **MM-TCR-2**). However, because Alternative 4 would result in a smaller area of disturbance, impacts related to tribal cultural resources would be slightly reduced compared to the project.

6.5.4.19 Utilities and Service Systems

Alternative 4 would result in a smaller park than the project but, similar to the project, would increase demand on the water supply and ~~may~~could require new or expanded water facilities. With implementation of **MM-UTIL-1** and **MM-UTIL-2**, these impacts would be reduced to a less-than-significant level. Overall, Alternative 4 would result in slightly reduced impacts related to utilities and service systems compared to the project.

6.5.4.20 Wildfire Hazards

Similar to the project, Alternative 4 would be required to comply with rules established under ~~San Diego~~the County Code of Regulatory Ordinances that, which would help reduce risks associated with fire. In addition, Alternative 4 would include a Site Evacuation Plan that would identify emergency contact information, evacuation routes and established meeting places, and a safety protocol to ensure the safe evacuation of visitors and employees of the park. Because Alternative 4 would result in a smaller project, impacts related to wildfire risk would be slightly reduced compared to the project.

6.5.4.21 Relationship to Project Objectives

Alternative 4 would involve a smaller active park area than the project ~~and, as such, therefore~~, this alternative would result in slightly reduced impacts related to the majority of the resources, including air quality, biological resources, cultural resources, energy, geology and soils, GHG emissions, hazards and hazardous materials, hydrology and water quality, noise, transportation and circulation, tribal cultural resources, utilities and service systems, and wildfire. Alternative 4 would result in similar impacts related to aesthetics and visual resources, agriculture and forestry resources, land use and planning, mineral resources, population and housing, public services, and recreation. Alternative 4 would still meet the project objectives because while it would remove the bike and skate parks, it would still provide for long-term natural and cultural resource management at the project site, create a community gathering place, enhance the quality and life and public health of the community, and accommodate a variety of active and passive recreational uses.

Objective 1: Create a place where all Alpine residents can gather and connect as a community.

The County General Plan Conservation and Open Space Element includes Goal LU-18, which encourages the development of civic uses that enhance community centers and places (County General Plan, p. 3-46). The proposed project and Alternative 4 would meet this goal of providing the community with a new location to gather and connect. In addition, the County General Plan Environmental Justice Element includes goal EJ-13, which aims to expand access to parks, recreational facilities, and other safe places for community members to be active (County General Plan, p. 9-47). The proposed project and Alternative 3 would be consistent with this goal because they would both provide a space for the community to be active or congregate. However, the proposed project would provide additional areas for the public to be active because it would include a bike park and skate park.

Objective 2: Anticipate, accommodate, and manage a variety of active and passive recreational uses and open space preserve that benefit all members of the Alpine community, both now and in the future.

The County General Plan Conservation and Open Space Element includes Goal COS-21, which aims to provide park and recreation facilities that enhance the quality of life and meet the diverse active and passive recreational needs of county residents and visitors, protect natural resources, and foster an awareness of local history, with approximately 10 acres of local parks and 15 acres of regional parks provided for every 1,000 persons in the unincorporated county. Policy COS-21.1, Diversity of Users and Services, calls for providing parks and recreation facilities that create opportunities for a broad range of recreational experiences to serve user interests. Although there are adjacent passive parks and some smaller active parks in the vicinity, the County's goal is to provide active and passive park opportunities to all local citizens that are usable by all age groups and all abilities. There are private parks, but they are not available to all citizens within Alpine, which is contrary to the goal for the county. The proposed project and Alternative 4 would both provide these facilities and meet the objectives of Policy 21.1. However, the proposed project would provide additional areas for the public to be active because it would include a bike park and skate park. In addition, according to the County Parks Master Plan, population density is projected to increase by 61 percent in the central Alpine CPA by 2040 (County Parks Master Plan, p. 53). As a result, the demand for parks and recreational services will increase substantially over the coming years. Because the community already has a deficit of parkland, with only 1.83 acres per person, this will place greater demand on existing facilities. The proposed project and Alternative 4 would address these concerns and contribute to responsibly furthering the region's growth.

Objective 3: Provide for long-term natural and cultural resource management consistent with the goals and objectives of the MSCP for the preserve portion of the property.

Both the proposed project and Alternative 4 would be compatible with the objective of providing for long-term natural and cultural resource management consistent with the goals and objectives of the MSCP for the preserve portion of the property. Both the proposed project and Alternative 4 would have a volunteer living on-site as well as park rangers patrolling the area daily for both the park and preserve.

The proposed project and Alternative 4 would have designated trails with trash cans that would be emptied daily to prevent trash from accumulating; therefore, staff members would be on-site daily. The designated parking area of the proposed project and Alternative 4, with staff on-site, would prevent the public from parking within sensitive habitat and thereby potentially negatively affecting natural and cultural resources. In addition, the proposed project and Alternative 4 would include native grassland restoration that would benefit QCB habitat through the removal of non-native invasive species and create breeding pools for western spadefoots, which would expand the existing breeding population from Wright's Field.

Objective 4: Design a community park that integrates and, where feasible, preserves natural features into the park design.

The County General Plan Land Use Element includes Goal LU-6, which aims to balance the built environment with the natural environment, scarce resources, natural hazards, and the unique local character of individual communities (County General Plan, p. 3-29). Policy LU-6.6, Integration of Natural Features into Project Design, requires incorporation of natural features, including mature oaks, indigenous trees, and rock formations, into proposed development and

avoidance of sensitive environmental resources. In the northern portion of the project site, in areas where the equestrian facilities would be developed, groves of oaks would remain in place; development, as well as new landscaping, would be situated around the trees. Both the proposed project and Alternative 4 would have a community park that would meet this objective.

Objective 5: Enhance the quality of life in Alpine by providing exceptional park and recreational opportunities that improve health and wellness while preserving significant natural and cultural resources.

The County General Plan Conservation and Open Space Element includes Goal COS-22, which aims to provide high-quality parks and recreational programs that promote the health and well-being of County residents while meeting the needs of a diverse and growing population (County General Plan, p. 5-40). The proposed project and Alternative 4 would achieve this goal by providing Alpine with a multitude of recreational opportunities. Policy COS-22.1, Variety of Recreational Programs, also seeks to promote both active and passive recreational facilities (County General Plan, p. 5-41).

Under the proposed project and Alternative 4, programs at the park would be established according to recommendations from local residents and the many amenities that would exist on site. For example, more active older adults may enjoy hiking or biking along trails, working out at fitness stations, or taking an instructor-led Yoga or Zumba class. Less active older adults may enjoy working with plants in the community garden, reading a book on a shaded park bench, or socializing at the dog park. The proposed project and Alternative 4 would support these programs, and given the lack of suitable parkland in Alpine, it is unlikely that the community would be provided with these enrichment programs elsewhere. In addition, daily ranger presence would be established under the proposed project and Alternative 4. Both the proposed project and Alternative 4 would provide regular park programs, classes, and events held by rangers on County properties to teach visitors about the land and local wildlife, area history, and the importance of park stewardship.

Live Well San Diego is the County's vision for addressing long-standing inequities and disparities through key interventions, programs, and services in communities that face barriers to achieving outcomes for building better health. It aligns the efforts of individuals, organizations, and government to help county residents live well and includes specific strategies to track outcomes related to health, wellness, and equity. The Live Well San Diego CHA is a systematic examination of the health status indicators for the population of San Diego County and used to identify key assets, trends, and challenges in a community. The purpose is to provide data and information to inform community health planning efforts. The County's HHSA divides the county into six regions to analyze under the CHA. Alpine is located in the East County region.

Live Well San Diego establishes community health indicators related to the built environment, including the percentage of the population living within 0.25 mile of a park. Access to parks and recreational services has been shown to have positive health impacts, including the physical, social, and mental aspects of health and well-being for community members. Parks and open spaces help to reduce chronic diseases, improve mental health, foster community connections, and encourage physical activity. According to the CHA, only 18.5 percent of Alpine's population lives within 0.25 mile of a park or community space compared to the East County population average of 53.3 percent and 61.5 percent countywide. Alpine has one of the lowest percentages of the population living within 0.25 mile of a park or community space in East County (CHA 2019–2021,

p. 208). As a community with a deficit of parkland, Alpine would greatly benefit from the addition of an active park, which the proposed project and Alternative 4 would provide.

According to Live Well San Diego, the recommended level of physical activity for adults is a total of 150 minutes of moderate activity every week. In 2015, 8.8 percent of adult San Diegans had been diagnosed with heart disease. The region with the highest percentage of residents who had ever been diagnosed with heart disease was East County, at 12.1 percent (CHA 2019–2021, p. 33). The addition of active parkland and recreational spaces would provide the community with a well-maintained, up-to-date, safe, and inviting activity space with much-needed facilities and programs to promote physical activity and contribute to other positive health benefits.

The County General Plan Environmental Justice Element includes Goal EJ-11, which strives to increase physical activity resources and programs to reduce rates of obesity, heart disease, diabetes, and other health-related illnesses for residents of all ages, cultural backgrounds, and abilities in the County. Policy EJ-11.5, Community Engagement, encourages partnering with community-based organizations to create appropriate and relevant programming and support improvements to natural and built-environment placemaking that promote physical activity and recreation (County General Plan, p. 9-46). Both the proposed project and Alternative 4 would help the County achieve these policy objectives or make progress toward enhancing the health and wellness of the community.

Objective 6: Protect public health and safety by incorporating Crime Prevention Through Environmental Design and other safety measures into the park design.

The proposed project and Alternative 4 would protect the public health and safety by acting as a temporary safe refuge area and staging area for the Alpine FPD should a fire occur in Alpine. The proposed project and Alternative 4 would provide a four-way stop to slow down traffic on South Grade Road, in addition to adding crosswalks and a walking path for the public. There would also be active monitoring by rangers daily and a volunteer living on-site to protect the area from crime under both the proposed project and Alternative 4.

Objective 7: Manage Alpine County Park consistent with County DPR's missions, policies, directives, and applicable laws and regulations.

The Alpine community currently has no County parks and only 1.83 acres of parkland per 1,000 residents, which is less than the County General Plan goal of 10 acres of parkland per 1,000 residents. Alpine does not have adequate parkland to meet the recreational needs of the community, and there is a significant shortage of sports fields and other recreational amenities, as noted in the County's Parks Master Plan. Although there are some privately managed recreational spaces, which are operated under joint use agreements or as non-profit facilities, there are currently no County-managed public parks for Alpine residents. The project provides an opportunity to develop a portion of the property as an active park and conserve a substantial portion of the property as open space. The 98 acres would bring DPR closer to reaching park-per-resident goals. The roughly 25 acres within the parcel that are dedicated to active recreation offer enough space to provide a diverse mix of opportunities, ensuring there are options for residents of all ages, abilities and interests. In addition, according to the County Parks Master Plan, population density is projected to increase by 61 percent in the central Alpine CPA by 2040 (County Parks Master Plan, p. 53). As a result, the demand for parks and recreational services will increase substantially over the coming years. Because the community already has a deficit of parkland, with only 1.83 acres per person, this will

place greater demand on existing facilities. The proposed project and Alternative 4 would address these concerns and contribute to responsibly furthering the region's growth.

Objective 8: Reflect Alpine community's heritage through inclusion of architectural elements that reflect the rural nature of Alpine.

The proposed project would be consistent with County General Plan Conservation and Open Space Element Goal COS-11.3, which requires development within visually sensitive areas to minimize visual impacts and preserve unique or special visual features, particularly in rural areas, through creative site planning; integration of natural features into the project; appropriate scale, materials, and design to complement the surrounding natural landscape; and minimal disturbance of topography. The proposed project and Alternative 4 would meet this objective.

6.5.5 Analysis of Alternative 5 – Passive Park Alternative

6.5.5.1 Aesthetics and Visual Resources

The project site consists of undeveloped rural land with vegetation. The visual character is defined by open rural and undisturbed natural features. Under Alternative 5, Alpine Park would be opened to the public for use as a passive park. Alternative 5 would not involve any changes to the project site, except for formalizing a parking area for the passive park on 0.23 acre of existing disturbed areas adjacent to South Grade Road and south of the intersection at Calle De Compadres. Alternative 5 would include a parking area, consisting of dirt and/or DG, with an impervious surface for one or two ADA-compliant parking spaces; a split-rail fence would be installed around the perimeter of the parking area. The parking area would not have lighting or solar panels. This alternative would not involve any construction or operational activities that would affect aesthetic or visual resources or introduce new sources of light or glare to the site. Therefore, Alternative 5 would avoid impacts on aesthetics and visual resources. The impacts would be reduced when compared to the project.

6.5.5.2 Agriculture and Forestry Resources

Alternative 5 would not involve any changes to the project site, except for formalizing a parking area with access to existing trails. There would be no potential for the conversion of or a conflict with agricultural uses or zoning. However, although a portion of the project site is mapped as Farmland of Local Importance, the site is currently not used for agriculture and does not contain agricultural resources that meet the Prime and Statewide soil criteria. The project site does not contain lands zoned for forestland or timberland. Under Alternative 5, no impacts on agriculture or forestry resources would occur, which would be similar to the project.

6.5.5.3 Air Quality

Alternative 5 would not involve any changes to the project site, except for formalizing a parking area with access to existing trails. This alternative would not introduce any new sources of emissions or odors and would not result in construction or operational activity compared to the proposed project. No impacts related to air quality would occur under Alternative 5, and impacts would be reduced compared to the project.

6.5.5.4 Biological Resources

Alternative 5 would not involve any changes to the project site, except for formalizing a parking area with access to existing trails. The project site's existing native vegetation would remain undisturbed. No impacts on special-status plants, special-status wildlife, or sensitive natural communities would occur as a result of implementation of this alternative. Therefore, Alternative 5 would avoid impacts on sensitive natural communities or on any special-status species. No impacts on biological resources would occur under Alternative 5, and impacts would be reduced compared to the project.

6.5.5.5 Cultural Resources

Alternative 5 would result in minimal ground-disturbing activities that would have the potential to unearth and damage significant cultural resources. Mitigation measures identified in Section 4.5, *Cultural Resources*, would reduce these impacts to less-than-significant levels (MM-CUL-1 through MM-CUL-3). Alternative 5 would result in less ground disturbance than the project, impacts on cultural resources under Alternative 5 would be reduced compared to the project. The project would also include activities that would protect and manage on-site cultural resources in perpetuity. Under Alternative 5, impacts on cultural resources would be reduced compared to the project.

6.5.5.6 Energy

Alternative 5 would not involve any changes to the project site, except for formalizing a parking area with access to existing trails. Therefore, Alternative 5 would not involve construction activities that would have the potential to conflict with the County's 2018 CAP. Because Alternative 5 would not introduce any new uses at the site, there would be no change in energy consumption under this alternative, and no impacts would result related to energy. Therefore, energy impacts under Alternative 5 would be reduced compared to the project.

6.5.5.7 Geology and Soils

Alternative 5 would result in minimal ground-disturbing activities that would have the potential to damage or destroy any paleontological resources. Mitigation would reduce these impacts to less-than-significant levels (MM-GEO-1). Therefore, Alternative 5 would not have the potential to damage or destroy any paleontological resources and would result in no impacts related to geology and soils. Alternative 5 would result in less ground disturbance than the project. Impacts on geology and soils under Alternative 5 would be reduced compared to the project.

6.5.5.8 Greenhouse Gas Emissions

Alternative 5 would not involve any changes to the project site, except for formalizing a parking area with access to existing trails. Therefore, Alternative 5 would not involve construction activities that would have the potential to conflict with the County's 2018 CAP. Because Alternative 5 would not introduce any new uses at the site, there would be no change in GHG emissions under this alternative, and no impacts related to GHG emissions would occur. Therefore, impacts related to GHG emissions under Alternative 5 would be reduced compared to the project.

6.5.5.9 Hazards and Hazardous Materials

Alternative 5 would not involve any changes to the project site, except for formalizing a parking area with access to existing trails. Alternative 5 would involve minor construction activities but would not include ground-disturbing activities that could result in the release of contaminated soil into the environment. In addition, Alternative 5 would not involve any changes to the project site and, therefore, would not introduce new conditions at the project site that would have the potential to exacerbate wildfire risks. Therefore, no impacts related to hazards and hazardous materials would occur under Alternative 5, and impacts would be reduced compared to the project.

6.5.5.10 Hydrology and Water Quality

Similar to the project, Alternative 5 would comply with BMPs required by the County's IRMP and BMP Design Manual. It would also implement a SWPPP, as required by the General Construction Permit. Compliance with these regulations would ensure that construction activities would not substantially degrade water quality. In addition, during operation, the County would require development of an SWQMP to guarantee that effective LID features and BMPs would be implemented, ensuring that stormwater runoff during operational activities would not degrade water quality. Alternative 5 would formalize a parking lot with an impervious surface for one or two ADA-compliant parking spaces. Alternative 5 would result in less impervious surface area than the project and include existing trails through existing disturbed areas. Impacts under Alternative 5 related to hydrology and water quality would be less than significant, and because Alternative 5 would involve a smaller project, with a smaller amount of impervious surface area, those impacts would be reduced compared to the project.

6.5.5.11 Land Use and Planning

Alternative 5 would not involve any changes to the project site, except for formalizing a parking area with access to existing trails. This would not have the potential to physically divide an established community or cause a significant environmental impact due a conflict with a land use plan, policy, or regulation adopted for the purposes of avoiding or mitigating an environmental effect. No impacts related to land use and planning would occur under Alternative 5, and impacts would be reduced compared to the project.

6.5.5.12 Mineral Resources

As discussed in Section 4.12, *Mineral Resources*, the project site does not contain mineral deposits or active mines; therefore, Alternative 5 would not result in the loss of locally important mineral resources. Alternative 5 would not result in any development at the site. It would result in less-than-significant impacts related to mineral resources, similar to the project.

6.5.5.13 Noise and Vibration

Alternative 5 would include a parking area, consisting of dirt and/or DG, with an impervious surface for one or two ADA-compliant parking spaces; a split-rail fence would be installed around the perimeter of the parking area. The potential to generate substantial noise impacts at the site from formalizing a parking area for the passive park on 0.23 acre of existing disturbed areas adjacent to South Grade Road, such as grading or paving, would be reduced to a less-than-significant level with implementation of the mitigation measures identified in Section 4.13, *Noise and Vibration*.

6.5.5.14 Population and Housing

Alternative 5 would not involve any changes to the project site, except for formalizing a parking area with access to existing trails. Alternative 5 would not involve any construction or operational activities at the project site and would not induce population growth or displace people or housing. Alternative 5 would result in no impacts related to population and housing, similar to the proposed project.

6.5.5.15 Public Services

Alternative 5 would not introduce any new uses or operational activities at the project site and would not result in any increased demand on public services. Alternative 5 would result in no impacts related to public services, and impacts would be reduced compared to the project.

6.5.5.16 Recreation

Alternative 5 would not involve any changes to the project site, except for formalizing a parking area with access to existing trails. Alternative 5 would not involve the construction or operation of an active park at the project site. Because Alternative 5 would not provide new active recreational facilities to meet existing or future demand, this alternative could result in the increased use of existing neighborhood parks or other recreational facilities such that substantial deterioration could occur or require the construction of new or expanded parks elsewhere. Therefore, Alternative 5 would result in increased impacts related to recreation compared to the project.

6.5.5.17 Transportation and Circulation

Alternative 5 would not involve any changes to the project site, except for formalizing a parking area with access to existing trails. Therefore, Alternative 5 would not generate any new sources of traffic that would travel to or from the project site. As such, no impacts related to transportation and circulation would occur under Alternative 5, and impacts would be reduced compared to the project.

6.5.5.18 Tribal Cultural Resources

Alternative 5 would involve grading and paving a parking area, consisting of dirt and/or DG, with an impervious surface for one or two ADA-compliant parking spaces; a split-rail fence would be installed around the perimeter of the parking area. Similar to the project, Alternative 5 would result in ground-disturbing activities that would have the potential to unearth and damage significant tribal cultural resources during construction. Mitigation measures identified in Section 4.18, *Tribal and Cultural Resources*, would reduce these impacts to less-than-significant levels (**MM-CUL-1** through **MM-CUL-3**). In addition, because Alternative 5 would result in less ground disturbance than the project, impacts on tribal cultural resources under Alternative 5 would be reduced compared to the project.

6.5.5.19 Utilities and Service Systems

Alternative 5 would not involve any changes to the project site, except for formalizing a parking area with access to existing trails. Alternative 5 would not introduce any new uses or facilities or increase demand on utilities at the project site. No impacts related to utilities would occur under Alternative 5, and impacts would be reduced compared to the project.

6.5.5.20 Wildfire Hazards

Alternative 5 would not introduce any new uses or increase the number of potential human-related ignition sources at the project site. The parking area with access to existing trails would be formalized within the existing disturbed area adjacent to South Grade Road. No impacts related to wildfire would occur under Alternative 5, and impacts would be reduced compared to the project.

6.5.5.21 Relationship to Project Objectives

Alternative 5 would avoid or reduce impacts related to the majority of the resource areas, including aesthetics and visual resources, air quality, biological resources, cultural resources, energy, geology and soils, GHG emissions, hazards and hazardous materials, noise, transportation and circulation, tribal cultural resources, utilities and service systems, and wildfire. Alternative 5 would result in minimal reduced impacts related to hydrology and water quality, land use and planning, population and housing, and public services; it would result in similar impacts related to agriculture and forestry resources and mineral resources. Alternative 5 could result in a greater level of impact related to recreation. It would not result in the benefits to biological and cultural resources that would be realized through implementation of the project.

Alternative 5 would meet only one of the project objectives (Objective 3) because it would still provide for long-term natural and cultural resource management at the project site, albeit at a lower level of benefit compared to the project. Alternative 5 would not achieve any of the other objectives related to creating a community gathering place, enhancing the quality of life and public health of the community, and accommodating a variety of active and passive recreational uses.

Objective 1: Create a place where all Alpine residents can gather and connect as a community.

The County General Plan Conservation and Open Space Element includes Goal LU-18, which encourages the development of civic uses that enhance community centers and places (County General Plan, p. 3-46). The project would not be compatible with this goal of providing the community with a new location to gather and connect because Alternative 5 would not have the amenities to support it. Potential community uses of the site could include sporting events, small swap meets, farmers markets, or other community gatherings. However, Alternative 5 would not have the amenities or infrastructure needed to accommodate the gathering of Alpine residents. In addition, the County General Plan Environmental Justice Element includes goal EJ-13, which aims to expand access to parks, recreational facilities, and other safe places for community members to be active (County General Plan, p. 9-47). Although the project would be consistent with this goal, Alternative 5 would not provide a space for the community to be active or congregate.

Objective 2: Anticipate, accommodate, and manage a variety of active and passive recreational uses and open space/preserve lands that benefit all members of the Alpine community, both now and in the future.

The County General Plan Conservation and Open Space Element includes Goal COS-21, which aims to provide park and recreation facilities that enhance the quality of life and meet the diverse active and passive recreational needs of County residents and visitors, protect natural resources, and foster an awareness of local history, with approximately 10 acres of local parks and 15 acres of regional parks provided for every 1,000 persons in the unincorporated County. Policy COS-21.1, Diversity of Users and Services, calls for providing parks and recreational facilities that create opportunities for a broad range of recreational experiences to serve user interests. Although there are adjacent passive

parks and some smaller active parks in the vicinity, the County's goal is to provide active and passive park opportunities to all local citizens that are usable by all age groups and all abilities. There are private parks, but they are not available to all citizens within Alpine, which is contrary to the goal for the County. Alternative 5 would not provide these facilities or meet the objectives of Policy 21.1. In addition, according to the County Parks Master Plan, population density is projected to increase by 61 percent in the central Alpine CPA by 2040 (County Parks Master Plan, p. 53). As a result, the demand for parks and recreational services will increase substantially over the coming years. Because the community already has a deficit with respect to parkland, with only 1.83 acres per person, this will place greater demand on existing facilities. Alternative 5 would not address these concerns or contribute to responsibly furthering the region's growth.

Objective 3: Provide for long-term natural and cultural resource management consistent with the goals and objectives of the MSCP for the preserve portion of the property.

Both the proposed project and Alternative 5 would be compatible with the objective of providing for long-term natural and cultural resource management consistent with the goals and objectives of the MSCP for the preserve portion of the property. However, with the proposed project, there would be a volunteer living on-site as well as park rangers patrolling the area daily. Therefore, although both the proposed project and Alternative 5 would have a Resource Management Plan, the proposed project would have additional on-site daily management for both the park and the preserve. In addition, although the trails would be available for use by the public under both the proposed project and Alternative 5, trash cans would be emptied daily to prevent trash from accumulating; therefore, staff members would be on-site daily. Furthermore, the larger designated parking area of the proposed project, with staff on-site, would prevent the public from parking on preserve land and thereby potentially negatively affecting the natural and cultural resources that could occur with Alternative 5. Alternative 5 would involve a small parking area without staff members on-site to ensure that the public parks in the designated area. The proposed project would create a walking path along the north side of South Grade Road, along County property, and a four-way stop with crosswalks, allowing the public to access the trails through designated routes without crossing through the proposed preserve land in the south to access the trails. In addition, the proposed project would include native grassland restoration that would benefit QCB habitat through the removal of non-native invasive species and create breeding pools for western spadefoots, which would expand the existing breeding population from Wright's Field.

Objective 4: Design a community park that integrates and, where feasible, preserves natural features into the park design.

The County General Plan Land Use Element includes Goal LU-6, which aims to balance the built environment with the natural environment, scarce resources, natural hazards, and the unique local character of individual communities (County General Plan, p. 3-29). Policy LU-6.6, Integration of Natural Features into Project Design, requires incorporation of natural features, including mature oaks, indigenous trees, and rock formations, into proposed development and avoidance of sensitive environmental resources. In the northern portion of the project site, in areas where the equestrian facilities would be developed, groves of oaks would remain in place; development, as well as new landscaping, would be situated around the trees. However, Alternative 5 would not include natural features in the project design because of the lack of physical structures proposed for development.

Objective 5: Enhance the quality of life in Alpine by providing exceptional park and recreation opportunities that improve health and wellness while preserving significant natural and cultural resources.

The County General Plan Conservation and Open Space Element includes Goal COS-22, which aims to provide high-quality parks and recreational programs that promote the health and well-being of County residents while meeting the needs of a diverse and growing population (County General Plan, p. 5-40). The project would achieve this goal by providing Alpine with a multitude of recreational opportunities. Policy COS-22.1, Variety of Recreational Programs, also seeks to promote both active and passive recreational facilities, which would not be provided by Alternative 5 (County General Plan, p. 5-41).

With its passive park, Alternative 5 would not offer programs that would be catered to the community. Under the proposed project, programs at the park would be established according to recommendations from local residents and the many amenities that would exist on the site. For example, more active older adults may enjoy hiking or biking along trails, working out at fitness stations, or taking an instructor-led Yoga or Zumba class. Less active older adults may enjoy working with plants in the community garden, reading a book on a shaded park bench, or socializing at the dog park. Alternative 5 would not be able to support these programs, and given the lack of suitable parkland in Alpine, it is unlikely that the community would be provided with these enrichment programs elsewhere. In addition, no ranger presence would be established under Alternative 5, given the lack of on-site facilities. This would prevent the community from receiving regular park programs, classes, and events held by rangers on County properties to teach visitors about the land and local wildlife, area history, and the importance of park stewardship.

Live Well San Diego is the County's vision for addressing long-standing inequities and disparities through key interventions, programs, and services in communities that face barriers to achieving outcomes for building better health. It aligns the efforts of individuals, organizations, and government to help County residents live well and includes specific strategies to track outcomes related to health, wellness, and equity. The Live Well San Diego CHA is a systematic examination of the health status indicators for the population of San Diego County and used to identify key assets, trends, and challenges in a community. The purpose is to provide data and information to inform community health planning efforts. The County's HHSA divides the county into six regions to analyze under the CHA. Alpine is located in the East County region.

Live Well San Diego establishes community health indicators related to the built environment, including the percentage of the population living within 0.25 mile of a park. Access to parks and recreational services has been shown to have positive health impacts, including the physical, social, and mental aspects of health and well-being for community members. Parks and open spaces help to reduce chronic diseases, improve mental health, foster community connections, and encourage physical activity. According to the CHA, only 18.5 percent of Alpine's population lives within 0.25 mile of a park or community space compared to the East County population average of 53.3 percent and 61.5 percent countywide. Alpine has one of the lowest percentages of the population living within 0.25 mile of a park or community space in East County (CHA 2019–2021, p. 208). As a community with a deficit of parkland, Alpine would greatly benefit from the addition of an active park, which Alternative 5 would not provide.

According to Live Well San Diego, the recommended level of physical activity for adults is a total of 150 minutes of moderate activity every week. In 2015, 8.8 percent of adult San Diegans had been diagnosed with heart disease. The region with the highest percentage of residents who had ever been diagnosed with heart disease was East County, at 12.1 percent (CHA 2019–2021, p. 33). The addition of active parkland and recreational spaces would provide the community with a well-maintained, up-to-date, safe, and inviting activity space with much-needed facilities and programs to promote physical activity and contribute to other positive health benefits.

The County General Plan Environmental Justice Element includes Goal EJ-11, which strives to increase physical activity resources and programs to reduce rates of obesity, heart disease, diabetes, and other health-related illnesses for residents of all ages, cultural backgrounds, and abilities in the County. Policy EJ-11.5, Community Engagement, encourages partnering with community-based organizations to create appropriate and relevant programming and support improvements to natural and built-environment placemaking that promote physical activity and recreation (County General Plan, p. 9-46). Alternative 5 would not help the County achieve these policy objectives or make progress in enhancing the health and wellness of the community.

Objective 6: Protect public health and safety by incorporating Crime Prevention Through Environmental Design and other safety measures into the park design.

The proposed project would protect the public health and safety by acting as a temporary safe refuge area and staging area for the Alpine FPD should a fire occur in Alpine; Alternative 5 would not. In addition, a four-way stop would slow down traffic on South Grade Road. The proposed project would add crosswalks and a walking path for the public, which Alternative 5 would not provide. There would also be active monitoring by rangers and a volunteer living on-site to protect the area from crime for the proposed project but not for Alternative 5.

Objective 7: Manage Alpine County Park consistent with County DPR's missions, policies, directives, and applicable laws and regulations.

The Alpine community currently has no County parks and only 1.83 acres of parkland per 1,000 residents, which is less than the County General Plan goal of 10 acres of parkland per 1,000 residents. Alpine does not have adequate parkland to meet the recreational needs of the community, and there is a significant shortage of sports fields and other recreational amenities, as noted in the County's Parks Master Plan. Although there are some privately managed recreational spaces, which are operated under joint use agreements or as non-profit facilities, there are currently no County-managed public parks for Alpine residents. The project would provide an opportunity to develop a portion of the property as an active park and conserve a substantial portion of the property as open space. The 98 acres would bring DPR closer to reaching park-per-resident goals. The roughly 26 acres within the parcel that are dedicated to active recreation offer enough space to provide a diverse mix of opportunities, ensuring options for residents of all ages, abilities, and interests. In addition, according to the County Parks Master Plan, population density is projected to increase by 61 percent in the central Alpine CPA by 2040 (County Parks Master Plan, p. 53). As a result, the demand for parks and recreational services will increase substantially over the coming years. Because the community already has a deficit of parkland, with only 1.83 acres per person, this will place greater demand on existing facilities. Alternative 5 would not address these concerns or contribute to responsibly furthering the region's growth.

Objective 8: Reflect Alpine community's heritage through inclusion of architectural elements that reflect the rural nature of Alpine.

The proposed project would be consistent with County General Plan Conservation and Open Space Element Goal COS-11.3, which requires development within visually sensitive areas to minimize visual impacts and preserve unique or special visual features, particularly in rural areas, through creative site planning; integration of natural features into the project; appropriate scale, materials, and design to complement the surrounding natural landscape; and minimal disturbance of topography. Alternative 5 would not meet Objective 8 because it proposes to construct only a split-rail fence, bench, and kiosk. It would not include the numerous new structures proposed by the project (e.g., fencing, shade structures, a playground, picnic tables, a bike park and all-wheel park, equestrian corral, restroom building, administrative building, storage structures). These structures would be designed to complement the rural agricultural character of the surrounding area, and the omission of these structures under Alternative 5 would preclude an opportunity to enhance the community's rural aesthetic and heritage.

6.5.56.5.6 Environmentally Superior Alternative

Pursuant to CEQA, the EIR is required to identify the environmentally superior alternative. Although the No Project Alternative (Alternative 1) reduces the greatest number of significant impacts, CEQA requires another alternative to be identified that when the environmentally superior alternative is the No Project Alternative, ~~another alternative should be identified. The Reduced Project, Under the Passive Park Alternative (Alternative 54) reduces,~~ the second-largest number of significant impacts would be reduced (see Table 6-3) because, unlike Alternatives 2, ~~and 3, and 4,~~ this alternative would ~~reduce the overall~~ not include acreage ~~offer~~ for active park space; it would provide access to existing trails and would also eliminate the bike and skate parks establish them for public use. Alternative 45 would ~~also~~ meet only one of the project objectives (Objective 3); it would not achieve any of the other objectives related to creating a community gathering place, enhancing the quality of life and public health of the community, and accommodating a variety of active and passive recreational uses. Therefore, Alternative 4 would be the environmentally superior alternative because it would feasibly attain most of the basic objectives of the project while lessening significant effects of the project. Under the Reduced Project Alternative (Alternative 4), the largest number of significant impacts would be reduced by eliminating the bike and skate portions of the active park.

Table 6-3. Summary Impact Comparison of Project Alternatives

Environmental Resource	Project Determination	Alternative 1: No Project	Alternative 2: Sports Complex	Alternative 3: Reconfigured Project	Alternative 4: Reduced Project	Alternative 5: Passive Park Project
Aesthetics and Visual Resources	Significant and Unavoidable	▼	▲	▼	▼	▼
Agriculture and Forestry Resources	Less than Significant	=	=	=	=	≡
Air Quality	Less than Significant w/Mitigation	▼	▲	=	▼	▼

Environmental Resource	Project Determination	Alternative 1: No Project	Alternative 2: Sports Complex	Alternative 3: Reconfigured Project	Alternative 4: Reduced Project	Alternative 5: <u>Passive Park Project</u>
Biological Resources	Less than Significant w/Mitigation	▼	▲	▲	▼	▼
Cultural Resources	Less than Significant w/Mitigation	▼	▲	=	▼	▼
Energy	Less than Significant w/Mitigation	▼	▲	=	▼	▼
Geology and Soils	Less than Significant w/Mitigation	▼	▲	=	▼	▼
Greenhouse Gas Emissions and Climate Change	Less than Significant w/Mitigation	▼	▲	=	▼	▼
Hazards and Hazardous Materials	Less than Significant w/Mitigation	▼	▲	=	▼	▼
Hydrology and Water Quality	Less than Significant	▼	=	=	▼	▼
Land Use and Planning	Less than Significant	▼	=	=	=	▼
Mineral Resources	Less than Significant	=	=	=	=	≡
Noise	Less than Significant w/Mitigation	▼	▲	=	▼	▼
Population and Housing	Less than Significant	▼	=	=	=	≡
Public Services	Less than Significant	▼	=	=	=	▼
Recreation	Less than Significant	▲	=	=	=	▲
Transportation and Circulation	Less than Significant	▼	▲	=	▼	▼
Tribal Cultural Resources	Less than Significant w/Mitigation	▼	▲	=	▼	▼
Utilities and Service Systems	Significant and Unavoidable	▼	▲	=	▼	▼
Wildfire Hazards	Less than Significant w/Mitigation	▼	▲	=	▼	▼

▲ Alternative is likely to result in greater impacts on issue when compared to project.

- = Alternative is likely to result in similar impacts on issue when compared to project.
- ▼ Alternative is likely to result in reduced impacts on issue when compared to project.

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