Chapter 3
Response to Comments on the 2026 Recirculated Draft EIR

3.1 Requirements for Responding to Comments on a Recirculated Draft Environmental Impact Report

Lead agencies are required to evaluate comments on environmental issues received on a Draft Environmental Impact Report (EIR) and prepare a written response pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15088. Written responses should address the environmental issue(s) raised and provide a detailed response. Rationale must be provided when specific comments or suggestions (e.g., additional mitigation measures) are not accepted. In addition, the written response must be a good-faith and reasoned analysis. As long as a good-faith effort at full disclosure is made in the EIR (CEQA Guidelines Section 15204), lead agencies need only respond to significant environmental issues associated with the project and do not need to provide all the information requested by commenters.

CEQA Guidelines Section 15088.5(f)(2) includes the following regarding recirculation of an EIR prior to certification:

> "When an EIR is revised only in part and the lead agency recirculates only the revised chapters or portions of the EIR, the lead agency may request that reviewers limit their comments to the revised chapters or portions of the recirculated EIR. The lead agency need only respond to (i) comments received during the initial circulation period that relate to chapters or portions of the document that were not revised and recirculated, and (ii) comments received during the recirculation period that relate to the chapters or portions of the earlier EIR that were revised and recirculated. The lead agency's request that reviewers limit the scope of their comments shall be included either within the text of the revised EIR or by an attachment to the revised EIR."

As described in the Reader's Guide for the 2026 Recirculated Draft EIR, the County requested that reviewers limit their comments to only EIR revisions in the recirculated sections and supplemental documents (Appendices D2, I1, and J1).

CEQA Guidelines Section 15204 recommends that commenters provide detailed comments that focus on the sufficiency of the Draft EIR in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated. CEQA Guidelines Section 15204 also notes that commenters should provide an explanation and evidence supporting their comments. Pursuant to CEQA Guidelines Section 15064, an effect shall not be considered significant in the absence of substantial evidence.

CEQA Guidelines Section 15088 also recommends that, where the response to comments results in revisions to the Draft EIR, those revisions should be noted as a revision to the Draft EIR or in a separate section of the Final EIR. Chapter 2, *Reader's Guide*, outlines the revisions to the 2026 Recirculated Draft EIR.

3.2 List of Commenters

The public agencies, organizations, and private individuals who submitted comments on the 2026 Recirculated Draft EIR during the public review period (July 31, 2026 to September 14, 2026) are listed below. As described in Chapter 2, the County originally circulated the project's Draft EIR for public review and comment on September 30, 2021. In December 2022, sections of the Draft EIR were recirculated, and the public review period for the 2022 Recirculated Draft EIR ended on February 28, 2023. Public comments and County responses on the Draft EIR and 2022 Recirculated Draft EIR are provided in Volume 4 of this Final EIR. The numbering for the 2026 Recirculated Draft EIR comment letters, responses, and master responses picks up where the responses on the Draft EIR and 2022 Recirculated Draft EIR comments left off to prevent duplicate numbering between the iterations of the EIR. 2026 comment letters and their responses are arranged in the order of agencies, organizations, and individuals, as shown in Table 3-1, *List of Commenters* below.

Table 3-1. 2026 List of Commenters

Letter	Name	Agency/Organization	Date
Agencies			
A6		California Department of Fish and Wildlife	September 9, 2026
Organizations			
O14		San Diego Mountain Biking Association	August 5, 2026
O15		Cleveland National Forest Foundation	September 9, 2026
Individuals			
I127	Adcock, Samantha M.		August 6, 2026
I128	Amborn, Lloyd		August 12, 2026
I129	Anderson, John		August 3, 2026
I130	August, Dawn		September 12, 2026
I131	Barnett, George		July 31, 2026
I132	Bennett, Kymberly		July 31, 2026
I133	Bergen, Ellen		August 13, 2026
I134	Bohmfalk, Adah		September 13, 2026
I135	Bohmfalk, Charles		September 13, 2026
I136	Brown, Stephanie		August 14, 2026
I137	Charvat, Jan		August 22, 2026
I138	Conway, Deana		September 14, 2026
I139	Conway, Jerry		September 14, 2026
I140	Craig, Anne		September 8, 2026
I141	Davis, Mary		September 14, 2026
I142	Fuchs, Chris		September 14, 2026
I143	Fuchs, Michelle		September 14, 2026
I144	Funtas, Michael		September 11, 2026
I145	Goodin, Sean		September 11, 2026
I146	Green, Jon		September 13, 2026
I147	Hales, Kim		September 14, 2026
I148	Hallihan, Laurie		August 29, 2026
I149	Hohimer, Don		September 14, 2026

Letter	Name	Agency/Organization	Date
I150	Howell, Neil		September 14, 2026
I151	Judy		September 14, 2026
I152	Katz, Peggy		September 14, 2026
I153	Kawabata, Tina		September 14, 2026
I154	Lewis, Amber		September 4, 2026
I155	Norton, Anne		September 14, 2026
I156	Norton, Charles		September 14, 2026
I157	Norton, Courtney		September 14, 2026
I158	Norton, Dominique		September 14, 2026
I159	Nygaard, Joyce		September 14, 2026
I160	Perez, Victoria		September 13, 2026
I161	Phelps, JP		July 31, 2026
I162	Pursglove, Jordan & Derrick		September 14, 2026
I163	Ranucci, Denae		September 14, 2026
I164	Reimund, Sarah		July 31, 2026
I165	Rivera, Janine		August 27, 2026
I166	Root, Jody		September 13, 2026
I167	Russo, Louis		September 4, 2026
I168	Smith, Mary		September 14, 2026
I169	Smith, Ron		September 14, 2026
I170	Spady, Jillian		September 14, 2026
I171	Stanko, Allen		September 12, 2026
I172	Todaro, Nick		August 21, 2026
I173	Williams, Patrick		September 14, 2026
I174	Wood, Karen		September 14, 2026
I175	Woolley, Tina		September 14, 2026

3.3 Comments and Responses to Comments

3.3.1 Master Responses

Several comments made on the 2026 Recirculated Draft EIR raised similar issues related to common topics. The following Master Responses are provided to address those repeated comments. As noted above, the numbering of these master responses picks up where the responses on the Draft EIR and 2022 Recirculated Draft EIR comments left off to prevent duplicate numbering between the iterations of the EIR.

Master Response MR-16 (Scope of the RDEIR)

CEQA Guidelines Section 15088.5(f)(2) includes the following regarding recirculation of an EIR prior to certification:

> "When an EIR is revised only in part and the lead agency recirculates only the revised chapters or portions of the EIR, the lead agency may request that reviewers limit their comments to the revised chapters or portions of the recirculated EIR. The lead agency need only respond to (i) comments received during the initial circulation period that relate to chapters or portions of the document that were not revised and recirculated, and (ii) comments received during the recirculation period that relate to the chapters or portions of the earlier EIR that were revised and recirculated. The lead agency's request that reviewers limit the scope of their comments shall be included either within the text of the revised EIR or by an attachment to the revised EIR."

As described in the Reader's Guide for the 2026 Recirculated Draft EIR, the County requested that reviewers limit their comments to only EIR revisions in the recirculated sections and supplemental documents (Appendices D2, I1, and J1). Comments on environmental issues that were not revised in the 2026 Recirculated Draft EIR are considered out of the scope of the 2026 Recirculated Draft EIR and do not require a written response.

A number of public comments raised issues that were not required to be analyzed in the 2026 Recirculated Draft Environmental Impact Report (RDEIR), including the need for the project, alternative locations, community character and aesthetics, traffic congestion, wildfire evacuation, septic systems, air pollution, noise pollution, and water use, among others. Various comments also discussed social or economic factors, such as property values or taxpayer funds. CEQA requires an analysis of a project's potential effects on the environment. Under CEQA Guidelines Section 15131(a), this excludes the economic or social effects of a project, unless those effects would also result in a physical impact on the environment. Therefore, these social and economic factors are not required to be addressed in the FEIR.

As for the other issues raised, typically, an EIR is circulated for only one public review and comment period. However, in some circumstances, an EIR, or portions of an EIR, must be recirculated for an additional public review and comment period. The purpose of recirculation is to give the public and agencies the opportunity to evaluate changes in the project, new information or analysis, or new conclusions relating to the significance of impacts, and submit comments on the same.

Here, the 2026 RDEIR is the result of a legal challenge against the project. On December 6, 2023, the County certified the project's 2023 FEIR and approved the project. On January 5, 2024, the Cleveland

National Forest Foundation and the California Native Plant Society (Petitioners) filed a lawsuit, alleging approval of the project violated the California Environmental Quality Act (CEQA). The Superior Court of the State of California (Superior Court) ruled in the Petitioners' favor for the CEQA claim regarding the EIR's analysis of potential impacts related to western spadefoot toad, pallid bat, wildfire, and vehicle traffic public safety. On January 20, 2026, the Superior Court entered a judgment granting the petition for Writ of Mandate (Writ) solely as to these CEQA issues. The Writ ordered the County to set aside the Board's certification of the EIR for the project and rescind all project approvals, including but not limited to the County's adoption of Environmental Findings and Mitigation, Monitoring, and Reporting Program. The Writ further stated that to the extent that the County revises the project's EIR, the revised environmental analysis must address only the CEQA deficiencies identified in the Court's June 9, 2025 Minute Order. These deficiencies identified directly from the Writ include:

> "Western Spadefoot Toad. Respondent shall address, providing reasoned analysis supported by substantial evidence in the record, comments submitted by Petitioners' expert stating that the Spadefoot can travel up to 600 meters from their breeding pools and noting that the USGS recommended an undeveloped buffer of 300 to 400 meters around breeding pools.
>
> Pallid Bat. Prior to making any finding that the 200-foot avoidance buffer from potential pallid bat roost sites, as set forth in mitigation measure MM-BIO-8, will avoid or substantially reduce a significant impact, Respondent shall support such a finding with substantial evidence in the record.
>
> Wildfire Impacts. Respondent shall separately analyze the significant impacts of the fire risk and its baseline existing conditions before proposing mitigation measures, and shall provide information on *how* it analyzed the effectiveness of the proposed measures.
>
> Vehicle Traffic Public Safety. Respondent shall analyze and disclose the traffic hazard impacts concerning South Grade Road, in particular, whether the Project will substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections). In doing so, Respondent shall not delay reasonably feasible analysis and potential impacts of the Project's driveway, the driveway's traffic control device, and sight distance analysis on traffic collisions, including as to pedestrians and bicyclists."

In response to the Court's January 2026 Writ, the County revised the project's EIR to address the issues listed above and recirculated only the following sections: Table of Contents, Biological Resources (Section 4.4), Hazards and Hazardous Materials (Section 4.9), Transportation and Circulation (Section 4.17), and Wildfire (Section 4.20), technical appendices associated with the four issues identified above, and a corresponding Reader's Guide to explain and outline all updates and revisions to the recirculated Draft EIR sections. As described above, the revised analysis is only required to address the CEQA deficiencies identified by the Court, and the previously certified 2023 FEIR was not recirculated in its entirety for public review and comment.

Under CEQA, a court can only require changes that are needed to bring the project into compliance. Because the court only took issue with specific issues documented in the January 2026 Writ, all other issues not addressed in the January 2026 Writ have been fully resolved, and the law assumes that the 2023 FEIR is adequate in all other respects (this is a legal principle also known as res judicata). The decertification of the entire 2023 FEIR does not alter the fact that the 2023 FEIR was litigated, and all issues were resolved. Res judicata applies even if an agency rescinds approval of a project and decertifies the entire EIR. (Citizens for Open Government v. City of Lodi [2012] 205

Cal.App.4th 296 [the court applied res judicata even though the city rescinded approval of the project and decertified the prior EIR].) Finally, res judicata bars the litigation of both issues that were actually litigated or could have been litigated. (Citizens for Open Government v. City of Lodi [2012] at 324-325.)

Master Response MR-17 (Project Scope and Alternatives)

Commenters questioned the need for the project and disapproved of the project's scope, stating a preference for a smaller or more passive park or alternative locations. The proposed project was designed to meet the project objectives described in Section 3.2 of Volume 2, which serve the County's underlying goal of providing active and passive recreational uses to meet the needs of the Alpine community both now and in the future. While 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. As described in MR-16 above (Scope of the RDEIR), the 2026 Recirculated Draft EIR was required to address only the CEQA deficiencies identified in the Court's June 9, 2025 Minute Order, which did not include the project's alternatives analysis. Refer to Chapter 6, *Alternatives* in Volume 2 of this Final EIR, which analyzes reduced footprint and passive park alternatives and explains that the County does not own other properties in Alpine, and therefore could not accomplish implementation of a new park at other potential locations within a reasonable period of time. Additional information and a response on the Passive Park Alternative is also provided in Master Response 10, Chapter 3, *Response to Comments on the Draft EIR and Recirculated Draft EIR* in Volume 4 of this Final EIR.

Master Response MR-18 (Emergency Evacuation)

Commenters expressed concern about how emergency evacuation may be impacted by the project. As described in more detail in MR-16 (Scope of the RDEIR) above, the project's EIR was recirculated in 2026 to address only the CEQA deficiencies identified in the Court's June 9, 2025 Minute Order, which include the avoidance buffers for western spadefoot and pallid bat, fire risk, and traffic hazards on South Grade Road. Regarding fire risk, the Writ states that the "Respondent shall separately analyze the significant impacts of the fire risk and its baseline existing conditions before proposing mitigation measures, and shall provide information on *how* it analyzed the effectiveness of the proposed measures." As described in the Minute Order, this deficiency is specifically related to ignition risk and the project's fire prevention measures. The Court did not identify the project's emergency evacuation analysis as a deficiency to be reanalyzed, and the revised analyses in Section 4.9, Section 4.20, and Appendix J1 of the 2026 Recirculated Draft EIR do not affect emergency evacuation. The emergency evacuation conclusion in Section 4.9.4 and Section 4.20.6 of the 2023 Final EIR is based on the project's compliance with adopted emergency response or evacuation plans. The revised analysis in the 2026 Recirculated Draft EIR conducts fire behavior modeling and ignition risk research to compare fire risk in the existing condition and fire risk with the project. These are two separate issues, and no modifications to the project have occurred that would affect the project's implementation of adopted emergency response or evacuation plans, including firefighting operations. As such, the emergency evacuation analysis in Section 4.9.4 and Section 4.20.6 of the EIR was not revised and is not an issue reanalyzed in the 2026 Recirculated Draft EIR. Impacts to emergency response and evacuation were concluded to be less than significant without mitigation in Sections 4.9.4 and 4.20.6 of the 2023 Final EIR. Refer to those sections in Volume 2 of this Final EIR for the detailed emergency evacuation analysis, which is beyond the scope of the 2026 Recirculated Draft EIR.

Master Response MR-19 (Wildfire Ignition and Spread)

Commenters expressed concern about wildfire ignition and spread on the project site and in the project vicinity. The 2026 Recirculated Draft EIR was revised to address the Writ's statement that the "Respondent shall separately analyze the significant impacts of the fire risk and its baseline existing conditions before proposing mitigation measures, and shall provide information on *how* it analyzed the effectiveness of the proposed measures." As described in the Minute Order, this deficiency is specifically related to ignition risk and the project's fire prevention measures. To address the Writ, the 2026 Recirculated Draft EIR included a Fire Protection Memorandum (Appendix J1) to supplement the 2021 Fire and Emergency Operation Assessment report. Appendix J1 includes a revised analysis of wildfire risk, including fire behavior and ignition potential. The results of the updated wildfire risk analysis were presented in the 2026 Recirculated Draft EIR under Threshold 7 of Section 4.9.4.3 and Threshold 2 of Section 4.20.6.3.

Specifically, Sections 4.20.2.1 and 4.20.4 of Volume 2 describe the existing fire behavior and ignition risks on the project site to provide a baseline against which the project can be compared. The project site is currently subject to occasional unauthorized vehicular and pedestrian public access to and within hazardous vegetation fuels, making it vulnerable to potential smoking, vehicle, or other ignition hazards that increase wildfire risk and spread. The existing hazardous vegetation fuels and current occasional unauthorized use of the undeveloped land places the project area at risk for fire ignitions associated with both natural events and human behavior. Volume 2 Section 4.20.6.3 acknowledges that the project is anticipated to lead to additional human presence at the site, which could increase fire risk by introducing additional opportunities for human-caused fire ignitions. However, the project would incorporate vegetation fuel modification fire prevention measures such as vegetation clearing to reduce wildfire spread, as well as human activity fire prevention measures including a live-on volunteer, maintenance staff, and park ranger to monitor and enforce requirements to reduce ignition risk. Specific prohibitions include smoking; the use of barbecues when a Red Flag Warning has been issued; the use or carrying of any fireworks, firearm, or explosive of any kind except as authorized under Section 41.117 of the County Code of Regulatory Ordinances; campfires and open flames; and overnight use of the park. Project barbecues would be appropriately shielded and contained, and would not involve open flames, consistent with the prohibitions mentioned above. The project would also strengthen vehicle control barriers and provide improved fire-safe parking. These measures would be incorporated into the park's operations manual, which outlines the mandatory operating procedures for the park. As the project owner and operator, County Parks would be responsible for implementing, maintaining, and monitoring these measures as part of ongoing park operations.

As described in Appendix J1 and Section 4.20 of Volume 2, a live-on volunteer, maintenance staff, and park ranger would enforce the prohibitions described above. All entrances to the park would include gates that would be closed and locked outside of the park's operational hours, preventing vehicular access to the project site. The on-site volunteer park host would assist with monitoring park activity, enforcing pedestrian/bicycle/equestrian access, opening and securing gates as assigned, reporting safety concerns or prohibited activities, and contacting DPR Rangers or emergency services after hours when necessary. On-site staffing during operating hours would include Park Maintenance Workers, Park Attendants, Park Rangers, and the volunteer park host as part of normal park operations. Rangers would conduct routine patrols as part of regional operations and would provide additional response based on reported concerns, park activity, or elevated fire-weather conditions. During patrols, Rangers would enforce restrictions on fires, smoking, and other prohibited ignition sources. Posted regulations, routine staff and Ranger

presence, the on-site volunteer park host, and securing the park at sunset would collectively help minimize unauthorized activity and potential ignition risks.

As described in Appendix J1, one of the most effective means of reducing ignitions is to combine effective education with judicious enforcement. Pairing restrictions (such as the prohibition of smoking) with on-site enforcement personnel establishes a comprehensive compliance framework by providing the legal authority necessary to support enforcement actions and penalties for violations; active monitoring and enforcement capacity to identify noncompliance and request compliance or summoning assistance from law enforcement; and direct public education and outreach that promotes awareness of regulations and reduces the likelihood of future violations. Appendix J1 and Sections 4.9 and 4.20 of Volume 2 demonstrate that the project would result in a net reduction in wildfire intensity, spread, and suppression difficulty compared to existing conditions. The project would reduce the risk of wildfire impacts to nearby residences compared to existing conditions, create a safer area for public use, and provide ancillary benefits by improving fire containment opportunities for emergency responders. As a result, impacts related to wildfire risk were determined to be less than significant without mitigation.

Master Response MR-20 (Baseline Wildfire Risk)

A number of comments asserted that the recirculated sections should state an independent significance conclusion for fire risk under existing conditions and that the analysis improperly treats compliance with code requirements as project mitigation rather than as part of the regulatory baseline. This is incorrect. The 2026 Recirculated Draft EIR was revised to address the Writ's statement that the "Respondent shall separately analyze the significant impacts of the fire risk and its baseline existing conditions before proposing mitigation measures, and shall provide information on *how* it analyzed the effectiveness of the proposed measures." As described in the Minute Order, this deficiency is specifically related to ignition risk and the project's fire prevention measures, which were the focus of the revised analysis in the 2026 Recirculated Draft EIR.

Specifically, Sections 4.20.2.1 and 4.20.4 in Volume 2 describe the existing fire behavior and ignition risks on the project site to provide a baseline against which the project can be compared. Several commenters asserted that the Writ requires the EIR to draw a significance conclusion about the baseline conditions for the project site; however, significance conclusions relate to a proposed project's potential impact on the environment. Under the existing condition, there is no project, and therefore no impact for which a significance conclusion can be drawn. The EIR acknowledges that the existing conditions on the project site are conducive to wildfire ignition and spread and provides quantitative fire behavior modeling to support the baseline conditions assessment. The EIR's characterization of baseline wildfire risk on the project site is adequate, and no specific impact conclusion for existing conditions without the project is possible nor required.

Additionally, code requirements applicable to the project are explicitly listed under Threshold 2 of Section 4.20.6.3 in Volume 2, which provides individual analyses for 1) the project with required fire prevention measures (code requirements) and 2) the project with additional fire prevention measures proposed by the County. There is no scenario in which the project could be constructed without replacing some of the existing hazardous natural vegetation with hardscape and landscaped areas suitable for the proposed park and complying with the listed vegetation management and human activity related code requirements. The code requirements are part of the regulatory environment in which the project would occur; they have already been adopted and are legally effective. Therefore, no analysis of a condition lacking code compliance is provided or required.

Further, the combined quantitative and qualitative analyses demonstrate that the project developed with only the code-required components would result in a less than significant impact without mitigation. Therefore, the additional fire prevention measures proposed are not mitigation, but aspects of the project design that would further reduce wildfire risk. The analysis in Volume 2, Section 4.20 is adequate, and no changes to the 2026 Recirculated Draft EIR are needed.

Master Response MR-21 (Pedestrian and Bicyclist Safety)

A number of comments expressed concern about pedestrian and bicyclist safety along South Grade Road. Regarding pedestrian and bicycle safety, the Writ states that the "Respondent shall analyze and disclose the traffic hazard impacts concerning South Grade Road, in particular, whether the Project will substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections). In doing so, Respondent shall not delay reasonably feasible analysis and potential impacts of the Project's driveway, the driveway's traffic control device, and sight distance analysis on traffic collisions, including as to pedestrians and bicyclists." As described under Threshold 3 of Section 4.17.4.3 in Volume 2, an Addendum to the project's Traffic Impact Study was prepared and included as Appendix I1 to the 2026 Recirculated Draft EIR to address the Writ. The Addendum to the Transportation Impact Study (TIS) conducted a sight distance analysis, evaluated crash history in the project vicinity, and modeled project parking demand to assess pedestrian and bicyclist safety. The analysis concluded that drivers would have sufficient sight distance of pedestrians and bicyclists, ensuring that vehicles would have ample time to slow down to avoid collisions. Additionally, the project includes a decomposed granite pedestrian path along the west side of South Grade Road, which would provide a separate path of travel for pedestrians outside of the vehicle right-of-way. Sports programming would also be scheduled and managed to prevent simultaneous sports activities and ensure the project's parking lot can accommodate park visitors and prevent spillover onto South Grade Road. As stated under Threshold 3 of Section 4.17.4.3 in Volume 2 "Even without these [sports programming] features, should park visitors choose to access the site via walking or bicycling, the project's proposed pedestrian path along the west side of South Grade Road would prevent pedestrians from walking within the roadway, and a driver traveling on South Grade Road under normal daytime conditions has sufficient sight distance to perceive a pedestrian or bicyclist near either driveway location and bring the vehicle to a complete stop before reaching the individual. Thus, no safety impacts to pedestrians or bicyclists would occur." As a result, impacts to pedestrian and bicyclist safety were determined to be less than significant without mitigation.

Master Response MR-22 (Analog Park Selection)

A number of comments expressed disapproval of the project's comparison to Hilton Head County Park, asserting that the parks are too different to provide a useful analysis. Appendix I1 presents a detailed discussion of the analog park selection and the ultimate determination that Hilton Head Park presents the best comparison to the project. Hilton Head County Park was selected on the basis of several comparability factors, including: (a) active recreational programming featuring multi-use sports field practice; (b) comparable facility scale, with a 10-acre developed footprint and a 56-space parking lot; and (c) the absence of tournament-level events, consistent with the day-use operational character anticipated at the Alpine Community Park.

Additionally, the difference in size between Hilton Head and Alpine was accounted for directly. Hilton Head's observed parking demand was increased by a factor of 2.5 based on the approximately 25-acre active program area at Alpine compared with Hilton Head's 10-acre developed area. Hilton Head is also located in a denser, more urbanized setting and serves a larger surrounding population

than Alpine, conditions that would generally be expected to generate greater baseline parking demand. Although adjusting for these differences would likely reduce the parking demand transferred to Alpine, no such downward adjustment was applied. The analysis therefore retains the higher Hilton Head demand as a conservative upper-bound estimate for the project.

Master Response MR-23 (Wright's Field Parking)

A number of commenters asked if parking for Wright's Field was factored into the project's parking analysis, and if visitors to Wright's Field would be required to use the project's parking lot. Wright's Field is currently open to the public, and the public would continue to utilize Wright's Field as they always have with the project. Visitors to Wright's Field would not be required to use the project's parking lot. Alpine County Park and Preserve would have formal trails that connect to Wright's Field; thus, users of the park could utilize the parking lot for access to Wright's Field, but it would not become the only way to access Wright's Field.

The parking analysis did consider existing passive use associated with the project area and Wright's Field. As part of the project team's review, historical aerial imagery from 2022 through 2026 was examined, with particular attention to weekend activity around the project site. The highest observed parking activity was approximately eight vehicles on April 17, 2021. That existing passive-use demand is also reflected conservatively in the Hilton Head County Park comparison. Hilton Head includes passive recreational uses in addition to organized sports activity, so the observed parking demand there includes both active and passive park users. The analysis then applied the 2.5 scaling factor to the total observed parking demand to account for the larger active recreation area at Alpine. This factor was determined based on size of Hilton Head (10 acres) compared to the project (25 acres). As a result, passive recreational demand was not excluded from the analysis. Rather, it was carried forward and conservatively increased as part of the overall parking demand estimate.

The project trail system will connect directly to the park parking lot, and trail users, including users accessing Wright's Field, will share the same on-site parking supply as other park users. Therefore, separate parking for trail users is not assumed or required as part of the parking analysis. Their demand is accommodated within the same 240-space parking supply evaluated for the project.

Master Response MR-24 (Breeding Pool AP-7)

A number of comments asked about why impacts to western spadefoot breeding pool AP-7 are necessary, how Appendix D2 characterizes the biological significance of breeding pool AP-7, and how mitigation for impacts to breeding pool AP-7 would be determined to be successful.

Breeding pool AP-7 is located within the active park development footprint and therefore must be filled during construction to accommodate the project.

The EIR recognizes AP-7 as potential western spadefoot breeding habitat but determines that its function is limited because the single egg mass was observed during an exceptionally wet year, no larvae were detected during weekly surveys, and the basin generally does not retain water long enough for successful larval development. Nevertheless, the loss of AP-7 is treated as a significant impact requiring mitigation and its loss would be offset at a 3:1 ratio through creation of three permanent breeding basins designed to support successful reproduction, resulting in an improved condition. This would be implemented through mitigation measure MM-BIO-4.

The EIR acknowledges that restored or created habitat cannot guarantee immediate use by western spadefoot. However, the mitigation program was specifically designed to restore and enhance breeding habitat in areas that would be permanently protected and managed for the species. The County is also committed to long-term monitoring, management, and habitat maintenance to support the continued viability of the local western spadefoot population. Additionally, the western spadefoot habitat mitigation and monitoring plan will include success criteria for the project. If results do not meet success criteria, adaptive management will be implemented. The USFWS and CDFW would be in receipt of annual reports detailing the status of the mitigation. If success criteria are not met these agencies will hold the County responsible for ensuring adequate mitigation is provided for project impacts to western spadefoot. Additionally, the County has obtained appropriate permits from the USFWS and is seeking appropriate permits from CDFW for impacts to western spadefoot.

Master Response MR-25 (Driveway #2 Sight Distance)

Commenters asked for details regarding the maintenance of adequate sight distance at Driveway #2 per the sight distance analysis described in MR-21 (Pedestrian and Bicyclist Safety) above. The revised sight distance analysis was performed according to the Writ, which states that the "Respondent shall analyze and disclose the traffic hazard impacts concerning South Grade Road, in particular, whether the Project will substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections). In doing so, Respondent shall not delay reasonably feasible analysis and potential impacts of the Project's driveway, the driveway's traffic control device, and sight distance analysis on traffic collisions, including as to pedestrians and bicyclists." As described in Section 4.17.4.3 of Volume 2, the exact extent of vegetation obstructions within the sight triangle for Driveway #2 is dependent on field conditions at any given time. Sight distance triangle exhibits identifying the areas within which vegetation clearing and grading are to be maintained clear are provided in the Driveway Sight Distance Evaluation (Attachment C of Appendix I1). County of San Diego DPR staff would be responsible for monitoring vegetation within the park property that could affect sight distance at project intersections. Vegetation would be inspected as part of routine park maintenance and trimmed or cleared as needed to maintain required sight distance and safe visibility. Vegetation generally tends to grow more quickly during the spring and summer months than during winter, so exact schedule for maintenance will vary based on time of year and amount of vegetation present. Any vegetation or sight-distance concerns outside DPR-maintained property or within the public right-of-way would be coordinated with the appropriate County department or responsible agency. The sight distance requirements would be implemented by the County's standard site plan review and improvement plan approval process pursuant to the County of San Diego Site Design Standards and Roadway Design Standards, which require that sight distance requirements be satisfied and shown on project plans prior to approval by County DPW. This is a required component of the project's review process and does not constitute deferred mitigation.

Master Response MR-26 (Western Spadefoot Buffer)

A number of commenters asserted that the 2026 Recirculated Draft EIR does not provide substantial evidence for why the County's proposed buffer of 262 meters around western spadefoot breeding pools is sufficient. However, the 2026 Recirculated Draft EIR specifically addressed the Writ, which stated that the "Respondent shall address, providing reasoned analysis supported by substantial evidence in the record, comments submitted by Petitioners' expert stating that the Spadefoot can travel up to 600 meters from their breeding pools and noting that the USGS recommended an

undeveloped buffer of 300 to 400 meters around breeding pools." Appendix D2 was prepared to provide additional analysis and response regarding the proposed western spadefoot buffers, and this analysis was incorporated into revised Section 4.4 of Volume 2 to explain why a larger buffer (such as the 486-meter 95th percentile distance or the 300- to 400-meter buffer proposed for the City of Santee Subarea Plan) is not required. Section 4.4 of Volume 2 and Appendix D2 acknowledge that larger buffers have been used in other cases, but the 262-meter distance is supported by site-specific evidence and is not intended to represent the species' maximum possible travel distance. For example, Baumberger et al. (2019) documented burrows 1 to 262 meters from breeding pools, with a mean distance of 40 meters. Although Halstead et al. (2021) documented longer movements, including a 486-meter 95th-percentile distance at one study site, the corresponding distance at another site was 187 meters, demonstrating substantial site-specific variation. Halstead et al. also found that the largest observed home range had an approximate 138-meter radius, which is within the 262-meter distance. A 262-meter buffer based on the above home range analysis is appropriate and adequate to protect western spadefoot, as described below.

When it comes to long-term western spadefoot population survival and reproduction, a key component is a safe route between upland habitat, where western spadefoot aestivate (hibernate) underground for the majority of the year, and ephemeral breeding pools, where tadpoles can grow without threat from aquatic predators or desiccation (drying out). Proximity to suitable upland habitat, humidity, soil moisture, rainfall, and time of year are all significant drivers of how far a western spadefoot is inclined to travel from a breeding pool (Baumberger et al. 2019 and Halstead et al. 2021). At the project site, a 262-meter buffer is sufficient to ensure long-term survival of the population.

The project's buffer is adequate because of the project's proximity to preserved habitat and Wright's Field Preserve, which contain suitable western spadefoot habitat and additional breeding pools, key components for the western spadefoot population to flourish. The proposed 262-meter buffer is the distance between the breeding pools and the project's construction limits. Additional protected habitat extends approximately 600 meters west and 850 meters north, and Wright's Field Preserve provides approximately 230 acres of protected habitat and dispersal opportunities. Most of the pools occupied by western spadefoot are on the adjacent Wright's Field Preserve, not within the project site. As such, western spadefoot are anticipated to utilize suitable habitat and breeding pools to the west, rather than travel into the project site. By contrast, if there was not abundant habitat immediately adjacent to the project site, a larger buffer may have been necessary to ensure a safe area of travel between the breeding pool and suitable upland habitat. Given the adjacency to suitable habitat, the proposed 262-meter buffer would allow for seasonal movements, movement between aestivation sites, population connectivity, and seasonal, long-distance migration.

The 300-400 buffer recommended for the Santee Subarea Plan was not applied to the project for the reasons described above; there is abundant suitable habitat in the project vicinity to help enable long-term western spadefoot population survival. A 300-400 meter buffer for the City of Santee Subarea Plan was selected due to site-specific characteristics where a larger buffer was necessary to connect pools to habitat outside of the Plan area. A smaller buffer would not have provided a safe route of travel between breeding pools and other surrounding suitable upland habitat due to the lack of suitably habitat in the vicinity. The Rochester study acknowledges Baumberger's documentation that western spadefoot travel as far as 262 meters from breeding pool sites and uses this finding to recommend the buffers for the City of Santee Subarea Plan, as discussed on pages 5 through 7 of that study (Rochester et al. 2017). The decision to use larger buffers in the City of

Santee Subarea Plan is based on the unique characteristics of the Subarea Plan and its vicinity, where suitable habitat was lacking, and does not invalidate the County's 262-meter buffer, which draws upon the same research consulted for the City of Santee's Subarea Plan, both of which take into account the availability of adjacent suitable habitat.

The 486-meter 95th percentile distance or 600-meter maximum travel distance do not need to be applied to the project site as a buffer because these larger buffers are not necessary to ensure long-term western spadefoot survival. As described above, a buffer of 262 meters would adequately protect western spadefoot individuals during construction and provide a safe area of travel between the breeding pool and adjacent suitable upland habitat. As described above, Baumberger et al. (2019) found that the mean distance of burrows from breeding pools was 40 meters, with a range of 1 to 262 meters. The maximum distance a burrow was recorded from the breeding pool ranged from 262 meters down to a minimum of 16 meters. The County conservatively selected the longest distance between the breeding pool and burrow from the Baumberger et al. study, 6.5 times the mean distance found in the study. Paired with the adjacency of suitable upland habitat and additional breeding pools, the County's 262-meter buffer provides ample protection for the local western spadefoot population.

The U.S. Fish and Wildlife Service evaluated the project's full conservation program, including preservation of 67.5 acres, permanent exclusion fencing, preconstruction surveys and relocation, and creation of three permanent breeding basins totaling at least 471 square feet within dispersal distance of the Wright's Field breeding sites. The Biological Opinion concluded that these measures would fully offset project impacts and maintain a population trajectory equal to or better than the no-project condition. The Biological Opinion is provided as Attachment A of Appendix D2. The research in the record and the opinion of biological experts, including agencies responsible for protecting sensitive species, concur that the proposed 262-meter buffer in conjunction with abundant habitat to the west and north would sufficiently protect western spadefoot, as described above. The 2026 Recirculated Draft EIR is adequate, and no changes are needed.

Master Response MR-27 (Pallid Bat MM-BIO-8)

A number of comments assert that the pallid bat survey and construction avoidance buffers conflict with one another; question the use of interspecies comparisons to determine the survey buffer; and claim the Bat Roost Management, Monitoring, and Mitigation Plan constitutes deferred mitigation. However, the 2026 Recirculated Draft EIR specifically addressed the Writ, which stated that "Prior to making any finding that the 200-foot avoidance buffer from potential pallid bat roost sites, as set forth in mitigation measure MM-BIO-8, will avoid or substantially reduce a significant impact, Respondent shall support such a finding with substantial evidence in the record." Appendix D2 was prepared to provide additional analysis and response regarding the proposed pallid bat roost construction avoidance buffer, and this analysis was incorporated into revised Section 4.4 of Volume 2.

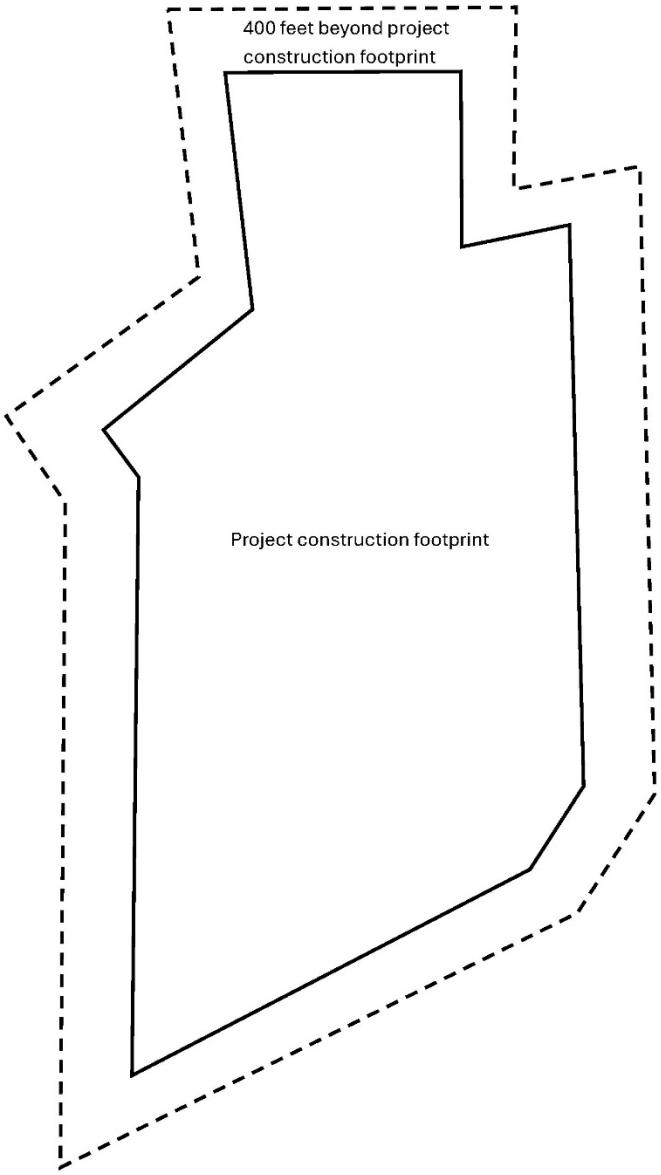
Regarding interspecies comparisons for the construction avoidance buffer, pallid bat-specific research is limited, so the EIR uses as much research as is available related to pallid bats and supplements that research with studies and agency guidance for other North American bat species with similar body size, roosting habitat, and life-history characteristics. Species that are known to be sensitive to disturbance are also included in the discussion. As described in Appendix D2, these sources document effective roost-protection distances ranging from 39 to 150 feet, while activity-specific guidance recommends distances of up to 150 feet for most construction activities. The EIR

therefore concludes that a minimum construction avoidance buffer of 200 feet, exceeding the guidance described above, is adequate to protect identified pallid bat roosts during construction. This construction avoidance buffer would be in place for all construction activities within 200 feet of a roost.

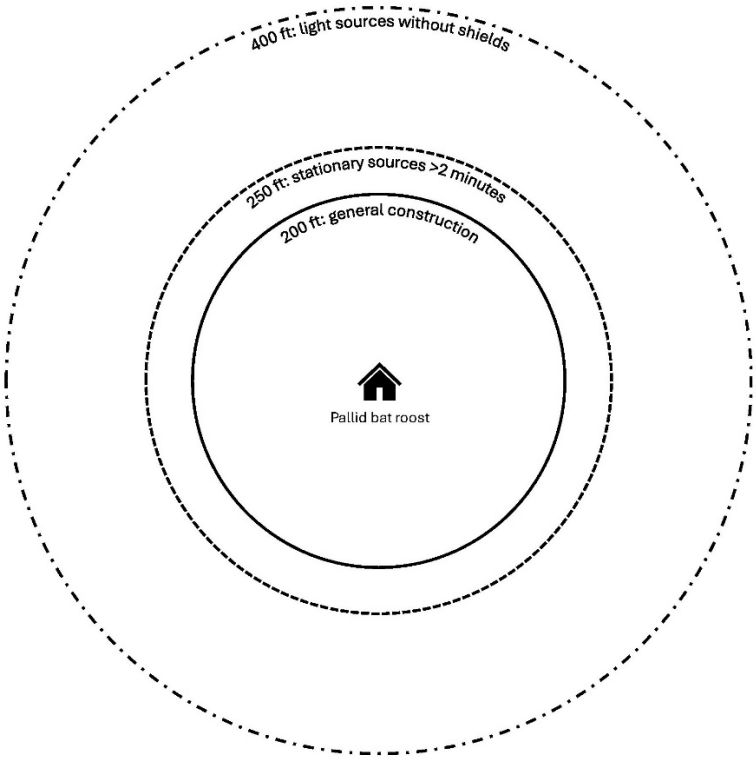
As described on page 16 of Appendix D2, Caltrans recommends the following avoidance buffers during construction between the active roost and the activity: construction trucks and heavy equipment, 120 feet; small vehicles, 90 feet; drilling, trenching, and small equipment, 150 feet; light source without shielding, 400 feet; pedestrian traffic, 65 feet; and stationary diesel/gasoline exhaust sources greater than 2 minutes, 250 feet. If stationary sources or lighting without shields are proposed during construction, the corresponding avoidance buffers above would be implemented in addition to the minimum 200-foot construction avoidance buffer. Several commenters asked how MM-BIO-8's 200-foot survey buffer would identify roosts that require these larger avoidance buffers; for example, a roost located at 225 feet would be within the zone requiring light and exhaust protection, but outside the 200-foot zone that triggers survey work to identify it in the first place. As shown in Section 4.4.4.3 in Volume 2, MM-BIO-8 has been revised to expand the survey buffer to 400 feet beyond the project construction footprint to ensure that any roost requiring Caltrans' larger 250-foot exhaust or 400-foot lighting buffers would be identified during preconstruction surveys and appropriate buffers would be implemented.

As described in Section 4.4.4.3, the survey buffer is separate from the maximum construction avoidance buffer. If a maternal roost is identified within the project site or within the 400-foot survey buffer beyond the project construction footprint, a qualified bat biologist must establish a construction avoidance buffer of at least 200 feet based on the species, proposed activity, and site conditions. As described above, the research demonstrates that avoidance buffers of 39 to 150 feet are sufficient to protect pallid bat, and the County's 200-foot construction avoidance buffer is conservative for general construction activities. Larger buffers are required for certain activities, including 250 feet for stationary sources longer than two minutes and 400 feet for lighting without shields. The two larger buffers for these specific activities would also be immediately implemented upon discovery of a roost. In addition, the construction avoidance buffer and/or the two activity-specific buffers, must be expanded as determined necessary by a qualified bat biologist if monitoring identifies stress or disturbance. Thus, the interspecies comparisons support the construction buffers as part of a site-specific, adaptive approach, rather than as a fixed distance applicable under all circumstances. The proposed survey buffer and minimum avoidance buffers are depicted below.

Proposed Survey Buffer: entirety of project construction footprint plus 400 feet beyond construction footprint



Proposed Minimum Avoidance Buffers



Finally, MM-BIO-8's Bat Roost Management, Monitoring, and Mitigation Plan is not a subject of the Writ or revisions made in the 2026 Recirculated Draft EIR, which were concerned with the 200-foot buffer around roost sites. Regardless, the Bat Roost Management, Monitoring, and Mitigation Plan is not deferred mitigation. As described under Threshold 1 in Section 4.4.4.3 of Volume 2, the contents of the Bat Roost Management Plan are dependent on the results of the pre-construction bat roost surveys, as specific protection requirements cannot be promulgated until the presence and location of roost sites are confirmed and identified. The Bat Roost Management, Monitoring, and Mitigation Plan would be prepared at least 30 days prior to the start of construction and provided to CDFW and would be specific to the management, monitoring, and mitigation during construction at the project site given the results of the pre-construction bat roost surveys. As described in MM-BIO-8, 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 would mitigate for the loss of the maternal roost site at a 2:1 ratio. This may include planting additional Engelmann oaks within the proposed open space if the affected maternal roost site utilized Engelmann oak trees or by building artificial bat roosts specifically for the affected bat species. The Bat Roost Management, Monitoring, and Mitigation Plan would include details on post-construction survey methodology, such as specific conditions in which surveys must be completed, and does not constitute deferred mitigation. Performance criteria are already included in MM-BIO-8.

Master Response MR-28 (Sports Programming Protocol)

Commenters requested more details about the logistics of the project's sports programming protocol to prevent vehicle spillover onto South Grade Road. The sports programming protocol is detailed on pg. 4.17-17 and would be implemented by sports and park programming staff. Specifically, DPR staff, including Park Rangers, Park Attendants, and volunteers, will monitor parking conditions during park operations and activities. The protocol limits use of the park to only one sport or user group for each park field/court at any given time and prohibits overlapping or simultaneous sports activities or practices. Unauthorized or unscheduled events would be stopped by the on-site staff. While an activity can proceed if the parking lot is already full, any parking spillover will be recorded, including the date, time, conditions observed, and actions taken, to ensure consistent tracking and follow-up. Following the first spillover event, DPR will evaluate the cause and implement the initial parking and traffic management measures identified in the project. If a second spillover event occurs, a minimum one-hour buffer shall be implemented between consecutive sessions to allow full vehicle turnover before the next group arrives. For example, if a session ends at 1:00 PM, the next session may not begin until 2:00 PM. This one-hour buffer shall increase to two hours if additional spillover continues to be observed. Following project opening, County staff and park rangers would monitor on-site and nearby on-street parking conditions for a minimum of one year of operation. If field observations demonstrate that actual parking demand associated with organized sports practices is consistently and materially lower than the levels estimated herein, modification of the sports programming protocol may be considered in coordination with County DPW. The sports programming protocol is incorporated into the project design and operational framework. As the project owner and operator, County Parks would be responsible for implementing, maintaining, and monitoring the sports programming protocol as part of ongoing park operations. The sport programming protocol would also be documented in the park's operations manual, which outlines the mandatory operating procedures for the park.

Comment Letter A6: California Department of Fish and Wildlife (CDFW), September 9, 2026

From: Gray, Emily@Wildlife
To: Doran, Megan E
Cc: Burlaza, Melanie@Wildlife; Porter, Eric; Wynn, Susan
Subject: [External] Draft Environmental Impact Report for Alpine County Park Project, SCH NO. 2021030196
Date: Wednesday, September 9, 2026 9:48:11 AM
Attachments: image001.png

Dear Megan Doran:

A6-1 The California Department of Fish and Wildlife (CDFW) reviewed the recirculated sections of the Draft Environmental Impact Report (DEIR) from County of San Diego (County) Department of Parks and Recreation (DPR) for the Alpine County Park Project (Project). Thank you for the opportunity to provide comments and recommendations regarding Project activities that may affect California fish and wildlife. Given our prior coordination on the topics below, the following comments are aimed at adding clarity on relevant state regulatory requirements to help strengthen and improve the final EIR. Our goal is to support the County in ensuring the document accurately reflects current state protections and permitting needs for the species addressed.

A6-2
1. Western Spadefoot: CDFW recommends including updated information in the Final EIR about the western spadefoot's new status under the California Endangered Species Act (CESA) and the County's plan to pursue an Incidental Take Permit (ITP). The California Fish and Game Commission recently determined that listing the western spadefoot under the California Endangered Species Act (CESA) may be warranted, granting it candidate species status, though that determination has not yet been officially published in the California Regulatory Notice Register; once it is posted, the western spadefoot will become an official CESA candidate, and from that point any project that might result in "take" of the species will require obtaining an Incidental Take Permit to be covered under CESA. If the Project or any related activities could result in take of western spadefoot, the County should obtain the proper authorization (e.g., an ITP) from CDFW before beginning work. We encourage early consultation, as some Project elements or mitigation measures may need to be adjusted to meet CESA requirements. Early consultation is encouraged, as significant modification to a Project and Mitigation Measures may be required to obtain a CESA Permit.

A6-3
2. Quino Checkerspot Butterfly: Quino Checkerspot Butterfly is protected under CESA as a candidate species. CDFW recommends the County incorporate this updated regulatory status into the Final EIR. Because the EIR states there will be take of Quino checkerspot butterfly, the County must obtain an ITP from CDFW. CDFW recommends this information regarding the new state status of Quino as well as the intent of the County to pursue an ITP be included in the Final EIR.

A6-4 We understand that the County has obtained an HCP from the U.S. Fish and Wildlife

A6-4 cont.

Service for both Quino checkerspot butterfly and western spadefoot; however, because both species are now CESA candidates, the County will also need to obtain take authorizations from CDFW. We recommend coordinating with CDFW for consultation prior to applying for Incidental Take Permits for both species.

If you have any questions regarding these comments, please contact me.

Thank you,
Emily

Emily Gray *(she/her)*
Environmental Scientist
South Coast Region 5
Emily.Gray@Wildlife.ca.gov
3883 Ruffin Road, San Diego, CA 92123

Comment Letter A6 Response: Comments A6-1 through A6-4

A6-1 This comment introduces the requests made in subsequent comments. Refer to responses A6-2 through A6-4 below regarding specific comments on the 2026 Recirculated Draft EIR.

A6-2 The commenter recommends updating the Final EIR to describe the western spadefoot's status as a candidate species under the California Endangered Species Act (CESA) and the County's plan to pursue an Incidental Take Permit (ITP). The County has submitted an application for an ITP that includes both Quino checkerspot butterfly and western spadefoot. The ITP process is ongoing and the County is continuing to coordinate with CDFW to ensure adequate protection of western spadefoot as the review process moves forward. The FEIR does not discuss the CESA status of individual species. Rather, any species 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), the California Endangered Species Act (CESA), or the County's Sensitive Plant List and Sensitive Animal List have been included in the FEIR as a special status species as they are afforded protections. Section 4.4.4.3 of Volume 2 already identifies western spadefoot as a special-status species. Volume 2 Chapter 1, *Introduction* of the Final EIR has been revised to clarify that the project would require an ITP for western spadefoot.

A6-3 The commenter recommends updating the Final EIR to describe the Quino checkerspot butterfly's status as a candidate species under the CESA and the County's plan to pursue an ITP. As described in response A6-2 above, the County is currently working with CDFW to pursue an ITP for Quino checkerspot butterfly and has submitted a permit application. The FEIR does not discuss the CESA status of individual species. Rather, any species 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), the California Endangered Species Act (CESA), or the County's Sensitive Plant List and Sensitive Animal List have been included in the FEIR as a special status species as they are afforded protections. Section 4.4.4.3 of Volume 2 already identifies Quino checkerspot butterfly as a special-status species. Chapter 1, *Introduction* of the Final EIR has been revised to clarify that the project would require an ITP for Quino checkerspot butterfly.

A6-4 This comment reiterates the requirement for an ITP and encourages coordination with CDFW before applying for ITPs for both species. Refer to responses A6-2 and A6-3 above regarding the western spadefoot and Quino checkerspot butterfly. The County has coordinated with CDFW on both species during development of the federal ITP. Additionally, given the recent listings of these species at the state level, the County held project-specific meetings to discuss the approach towards addressing potential impacts to these species with CDFW staff in September 2025, December 2025, May 2026, and September 2026 before submitting an ITP application in September 2026. The County acknowledges this comment. Chapter 1, *Introduction* of the Final EIR has been revised to clarify that the project would require an ITP for western spadefoot and Quino checkerspot butterfly.

Comment Letter O14: San Diego Mountain Biking Association, August 5, 2026

From: Susie Murphy
To: CEQA, CountyParks
Cc: Peter Hulburt
Subject: [External] SDMBA Letter - Alpine County Park Project, SCH# 2021030196
Date: Thursday, August 6, 2026 12:47:56 PM
Attachments: 2026_08 Letter_of_Support recirculated EIR.docx.pdf

Dear Megan:

O14-1 Attached please find a letter from the San Diego Mountain Biking Association addressing the Alpine County Park Project, SCH# 2021030196.

Thank you for the opportunity to comment.

Regards,

Peter Hulburt
SDMBA Executive Director

Susie Murphy
SDMBA Advocacy Advisor

San Diego Mountain Biking Association

August 5, 2026

Department of Parks and Recreation
ATTN: Megan Doran
5510 Overland Avenue, Suite 270
San Diego, CA 92123
Sent via email: CountyParksCEQA@sdcounty.ca.gov

RE: Support for the 2026 Recirculated Draft EIR for the Alpine County Park Project (SCH #2021030196)

Dear Ms. Doran,

I am writing on behalf of the San Diego Mountain Biking Association (SDMBA) and our 1,500 members to express our continued, strong support for the County of San Diego's Alpine County Park Project and for certification of the 2026 Recirculated Draft Environmental Impact Report (2026 RDEIR). SDMBA and our members have been engaged in the planning of this park since the property was acquired in 2019, and many of our members are Alpine residents themselves. After seven years of planning, we remain firmly committed to seeing this vision realized, including the bike park and all-wheel park amenities that our community has advocated for since the earliest public meetings.

We appreciate the thorough work the Department of Parks and Recreation and its technical consultants have put into the 2026 RDEIR to directly and transparently respond to the four discrete issues identified in the Superior Court's June 9, 2025 Minute Order and January 20, 2026 Writ of Mandate: western spadefoot toad impacts, pallid bat roost buffers, wildfire risk analysis, and vehicle traffic public safety along South Grade Road. We recognize that, per CEQA Guidelines Section 15088.5(f)(2) and the doctrine of res judicata, the scope of this recirculation is properly limited to those four issues, and we support the County's approach of focusing this review accordingly rather than reopening matters that were already litigated and resolved in the County's favor.

O14-2

As an organization representing the trail-using public, we are particularly encouraged by the revised traffic and circulation analysis in Section 4.17 and Appendix I1. The updated evaluation of sight distance, driveway design, and the shift from an all-way stop to a two-way stop-controlled intersection at Calle de Compadres and South Grade Road provides substantial evidence that pedestrians and bicyclists accessing the park will be able to do so safely. Many of our members travel to and from Alpine-area trailheads by bike, and we appreciate the County's careful attention to these safety considerations.

We are likewise supportive of the revised biological resources analysis in Section 4.4 and Appendix D2. SDMBA has long partnered with land managers throughout San Diego County on trail design, signage, and user education that minimizes impacts to sensitive species while preserving public access, and we are glad to see the western spadefoot buffer analysis and pallid bat roost avoidance measures grounded in substantial evidence in the record, consistent with the Court's directive. We would welcome the opportunity to continue working with County staff on trail-specific signage and seasonal closures if they would further support these mitigation measures once the park is open.

We urge the Department to move forward with certification of the Final EIR following this public review period, and we thank County staff for their continued diligence and vision in delivering connected trails and quality parks for the people of San Diego County.

Sincerely,

Peter Hulburt
Executive Director - San Diego Mountain Biking Association
peter@sdmba.com

P.O. Box 881491 San Diego, CA 92168
SDMBA.com - A 501(c)3 organization - Tax ID # 20-1701837

Comment Letter O14 Response: Comments O14-1 through O14-2

O14-1 This comment introduces the SDMBA's comment letter and does not address the adequacy of the 2026 Recirculated Draft EIR. Refer to response O14-2 below regarding specific comments submitted on the 2026 Recirculated Draft EIR.

O14-2 This comment expresses support for the project and acknowledges the specific revisions made in response to the Superior Court's June 9, 2025 Minute Order and January 20, 2026 Writ of Mandate. No changes to the 2026 Recirculated Draft EIR are needed.

Comment Letter O15: Cleveland National Forest Foundation (CNFF), September 9, 2026

Comment Letter O15

From: Duncan McFetridge
To: CEQA_CountyParks
Subject: [External] Extension for DREIR
Date: Thursday, September 10, 2026 10:10:31 AM
Attachments: Alpine County Park Project - SCH#2021030196 – Request for extension of comment period on Revised Draft EIR.pdf

Dear Ms Doran,

O15-1 Attached is CNFF comment extension request for the Alpine Park DREIR.

Please notify me of receipt of this request.

Thanks,

Duncan McFetridge
CNFF Director

September 9, 2026

Via E-Mail

Megan Doran, Project Manager
County of San Diego
Department of Parks and Recreation
5510 Overland Avenue, Suite 270
San Diego, CA 94123
CountyParksCEQA@sdcounty.ca.gov

Re: Alpine County Park Project - SCH#2021030196 – Request for extension of comment period on Revised Draft EIR

Dear Ms. Doran:

O15-2

On behalf of the Cleveland National Forest Foundation ("CNFF"), I hereby request an extension of the deadline for public comments on the Alpine County Park Revised Draft Environmental Impact Report ("RDEIR"). Public comments on the RDEIR are currently due on September 14, 2026. CNFF requests that the due date be extended to September 30, 2026.

This extension is warranted due to the voluminous nature of the revised materials, including technical appendices, and the two previous environmental impact reports off of which they tier. Thus, the 46 days currently provided, effectively the statutory minimum, is insufficient for a project of this significance. The impacted residents and communities deserve ample time to review and respond.

Thank you for your consideration of this request. I would appreciate receiving a response at your earliest convenience.

Duncan Mc Fetridge

Duncan McFetridge
Director CNFF
(619) 659-8962
www.cnff.org
sofar@nethere.com

Comment Letter O15 Response: Comments O15-1 through O15-2

O15-1 This comment introduces the CNFF's comment letter and public comment period extension request. Refer to response O15-2 below regarding specific requests made by the commenter.

O15-2 The commenter requests an extension of the deadline for public comments on the 2026 Recirculated Draft EIR to September 30, 2026. The County provided a response to CNFF's request on September 11, 2026 explaining that the extension request was reviewed and not granted. The 2026 Recirculated Draft EIR was circulated for 46 days, consistent with the requirements of State CEQA Guidelines Section 15105, which states that the public review period for a draft EIR shall not be less than 30 days nor should it be longer than 60 days except under unusual circumstances. Additionally, the 2026 Recirculated Draft EIR was substantially smaller than a typical draft EIR. For example, the project's 2021 Draft EIR and associated appendices were over 1,500 pages and circulated for a 47-day public review period. The 2026 Recirculated Draft EIR was a partial recirculation of four primary EIR sections (Biological Resources, Transportation, Wildfire, and Hazards & Hazardous Materials), associated technical appendices, a table of contents, a reference sheet, and a Reader's Guide to help orient the reader. The 46-day public review period is appropriate for this partial recirculation which included just over 400 total pages. There were no unusual circumstances warranting a longer public review period. Additionally, County DPR intentionally planned the release of the project's 2026 Recirculated Draft EIR at a time when no other County DPR public review periods were in process.

Comment Letter I127: Samantha M. Adcock, August 6, 2026

Comment Letter I127

From: Samantha M. Adcock
To: CEQA_CountyParks
Subject: [External] Alpine County Park Project - SCH#2021030196
Date: Thursday, August 6, 2026 3:58:36 PM
Attachments: IMG_6008.jpeg

Dear Megan Doran,

RE: 2026 recirculated draft EIR.

My name is Samantha Adcock. I received a letter regarding the Alpine County Park Project. I am writing as a homeowner, resident, and mother of two children in the surrounding community east of S Grade Rd, Alpine. I am writing to express my opposition to the proposed 25-acre park within the existing open space, Wright's Field.

I127-1 While I appreciate the County's goal of expanding recreational opportunities, I believe this project raises significant concerns that are still not adequately addressed in the latest draft- particularly regarding public safety, wildfire risk, and preservation of the rural character of our community- the reason my family left the city and specifically chose to relocate to a rural area within Alpine.

My concerns include the following:

I127-2 1: Increased wildfire risk- Our community is located in a high wildfire hazard area. A major park would increase daily human activity within our area, creating additional opportunities for accidental fire ignitions from vehicles, discarded smoking materials, equipment, or other recreational uses. Increased visitation would also complicate emergency response and evacuation efforts during wildfires. Before moving forward, the County should fully evaluate how this project would affect wildfire ignition risk, emergency access, evacuation capacity, and firefighting operations.

I127-3 2: Public safety- Introducing a regional destination into a currently quiet open space, surrounded by quiet rural communities will substantially increase public access. This raises concerns regarding trespassing onto neighboring private properties, vandalism, theft, illegal camping, off-trail use, (we do not have sidewalks), and other activities that may impact nearby residents. Rural communities often have limited law enforcement presence, making ongoing enforcement and monitoring difficult, and Alpine is no exception. The County should clearly identify how the park would be staffed, patrolled, maintained, and secured, including after-hours enforcement and funding for long-term operations.

I127-4 3. Preservation of open space- The purpose of an open space preserve should be to protect natural resources, wildlife habitat, scenic values, and the quiet enjoyment of nature. Constructing parking lots, restrooms, trails, gathering areas, sports fields, and other recreational infrastructure changes the character of the preserve and diminishes the conservation purpose for which these lands were originally protected. Alternative locations outside sensitive open space areas should be considered for intensive recreational facilities. Has the county considered more suitable locations for this project, such as the 3125-block of Alpine blvd? (See screen grab attached). This is the Lazy A Ranch location purchased by Grossmont union district for a school project that was cancelled, and has since sat vacant for over 15 years. This location solves many of my listed concerns- top being much more appropriate public and emergency access.



I127-5

4: Traffic and emergency access- A park of this size is expected to attract substantially more visitors, increasing traffic on rural roads that were not designed for high recreational use. Additional vehicle traffic may reduce emergency access during fires or medical emergencies and create safety concerns for residents, cyclists, equestrians, and pedestrians who currently use these roads. S Grade rd. is a 45mph road with various residential street turn-offs, it is already a known dangerous road for residents. There are no bike lanes or sidewalks. This poses serious concerns on safety. A comprehensive traffic study should evaluate both routine operations and emergency evacuation scenarios.

I127-6

5. Noise and quality of life: The increased volume of visitors would inevitably generate more vehicle traffic, noise, and activity that would alter the peaceful rural environment that residents chose when purchasing homes in this community. This change represents a significant impact on the quality of life for neighboring property owners. While some may argue this park is suited for young families, I can attest as a young family myself that we would like to preserve this space as-is. We have access to sports, parks and fields in Alpine and neighboring areas as-is.

I127-7

6. Long term financial responsibility: The County should clearly identify the long-term funding source for park maintenance, staffing, law enforcement, wildfire mitigation, infrastructure repairs, and resource protection. Without guaranteed ongoing funding, maintenance may decline, increasing safety risks and environmental degradation over time.

I127-8

For these reasons, I respectfully request that the County reconsider the proposed project and evaluate alternatives that better protect public safety, reduce wildfire risk, preserve open space, and maintain the rural character of the surrounding community. At a minimum, the County should prepare comprehensive analyses of wildfire impacts, emergency response, traffic, public safety, environmental effects, and long-term operational costs before approving the project.

Thank you for considering these comments and for your commitment to making decisions that balance recreation with the safety of residents and the protection of our natural resources.

Best regards,

Samantha Adcock
(619) 706-8580

Comment Letter I127 Response: Comments I127-1 through I127-8

I127-1 This comment expresses opposition to the project and introduces the concerns raised in subsequent comments. Refer to responses I127-2 through I127-8 below regarding specific comments submitted on the 2026 Recirculated Draft EIR.

I127-2 The commenter requests that the County fully evaluate wildfire ignition risk, emergency access, evacuation capacity, and firefighting operations. Refer to MR-18 (Emergency Evacuation) regarding project impacts to emergency response and evacuation, which were not required to be analyzed in the 2026 Recirculated Draft EIR. Please also refer to MR-9 (Wildfire) in Volume 4 Chapter 3, *Response to Comments on the Draft EIR And Recirculated Draft EIR* for additional information on emergency evacuation. Also refer to MR-19 (Wildfire Ignition and Spread); the project would not exacerbate wildfire risk. No changes to the 2026 Recirculated Draft EIR are needed.

I127-3 The commenter states that increased public access could result in public safety concerns and requests that the County clearly identify how the park would be staffed, patrolled, maintained, and secured. Refer to MR-16 (Scope of the RDEIR); public safety was not required to be analyzed in the 2026 Recirculated Draft EIR, but project impacts to police protection would be less than significant, as described under Threshold 2 of Section 4.15.4.3. Refer to MR-19 (Wildfire Ignition and Spread), which describes the project's on-site staffing and approach towards enforcement and patrols.

I127-4 The commenter asks if the County has considered constructing the project in an alternative location to avoid development of the natural open space on the project site. This preference is noted, but the 2026 Recirculated Draft EIR was required to address only the issues identified in the Superior Court's June 9, 2025 Minute Order and January 20, 2026 Writ of Mandate, which does not include the project's alternatives analysis, as described in MR-16 (Scope of the RDEIR). Refer to MR-17 (Project Scope and Alternatives) regarding the project's design; an alternate location is not considered feasible. No changes to the 2026 Recirculated Draft EIR are needed.

I127-5 This comment reiterates concerns about emergency evacuation and response and requests a comprehensive traffic study to evaluate pedestrian and bicyclist safety along South Grade Road. Refer to MR-18 (Emergency Evacuation) regarding project impacts to emergency response and evacuation, which were not required to be analyzed in the 2026 Recirculated Draft EIR. Please also refer to MR-9 (Wildfire) in Volume 4 Chapter 3, *Response to Comments on the Draft EIR And Recirculated Draft EIR* for additional information on emergency evacuation. Also refer to MR-21 (Pedestrian and Bicyclist Safety); safety impacts to pedestrians and bicyclists would be less than significant. No changes to the 2026 Recirculated Draft EIR are needed.

I127-6 The commenter expresses concerns about increased noise and decreased quality of life due to project implementation. Refer to MR-16 (Scope of the RDEIR); these issues were not required to be analyzed in the 2026 Recirculated Draft EIR. Additionally, CEQA requires an analysis of a project's potential effects on the environment. Under CEQA Guidelines Section 15131(a), this excludes the economic or social effects of a project, unless those effects would also result in a physical impact on the environment. Quality

of life and property values are social and economic effects that are not required to be studied under CEQA. Refer to Volume 2, Section 4.13, *Noise and Vibration*, which concludes that noise and vibration impacts would be less than significant with mitigation incorporated. No changes to the 2026 Recirculated Draft EIR are needed.

I127-7 The commenter requests that the County identify the long-term funding mechanism for the project but does not address the adequacy of the environmental analysis in the 2026 Recirculated Draft EIR. No changes to the 2026 Recirculated Draft EIR are needed.

I127-8 This comment summarizes the earlier concerns and requests expressed by the commenter. Refer to the responses above. No changes to the 2026 Recirculated Draft EIR are needed.

Comment Letter I128: Lloyd Amborn, August 12, 2026

Comment Letter I128

From: Lloyd Amborn
To: CEQA, CountyParks
Cc: Pam Amborn
Subject: [External] RE: Alpine County Park Project - Recirculated Draft EIR for Public Review
Date: Wednesday, August 12, 2026 1:34:07 PM
Attachments: image001.png
image002.png
image003.png
image004.png

Megan, Many thanks for providing us with this information for our review and comment.

First, we concur with and support the Recirculated Draft EIR for the Alpine Park. We believe it adequately addresses the 4 areas specified by the Court, and we hope the Court will agree.

I128-1 Second, we hereby register our unqualified support for the proposed Alpine Park and all its amenities. We have lived in Alpine since 1980 and in Palo Verde Ranch adjacent to the planned park since 1981. We raised two children here from pre-school age and now have teenage grandchildren here. The youth of Alpine have long-needed and deserved this park, and we commend the County staff and Board of Supervisors for supporting and funding it.

Please count us as fully in favor of the Alpine Park as proposed. Thank you.

Lloyd & Pamela Amborn
3540 Calle Colina Roca
Alpine CA 91901-3201
Lloyd's Mobile: +1-619-206-9145
Pamela's Mobile: +1-619-456-7043
Lloyd's Email: lpamborn@cox.net
Pamela's Email: 22pamela@cox.net

From: Doran, Megan E <MeganE.Doran@sdcounty.ca.gov> **On Behalf Of** CEQA, CountyParks
Sent: Friday, July 31, 2026 13:08
To: CEQA, CountyParks <CountyParksCEQA@sdcounty.ca.gov>
Subject: Alpine County Park Project - Recirculated Draft EIR for Public Review

Good afternoon,

The County of San Diego, Parks and Recreation Department is recirculating sections of the Draft Environmental Impact Report (EIR) for public review for the Alpine County Park Project pursuant to the California Environmental Quality Act. Please see attached for the Notice of Availability. The recirculated sections of the EIR along with supporting documents, together referred to as the 2026 Recirculated Draft EIR, can be accessed through the County Parks website by following this link:
https://www.sdparks.org/content/sdparks/en/AboutUs/Plans/public-review-

documents.html.

The public review period runs from today, July 31, 2026, through Monday, September 14, 2026. Written comments regarding the 2026 Recirculated Draft EIR must be received no later than **September 14, 2026 at 5:00 p.m.** Comments should be emailed to CountyParksCEQA@sdcounty.ca.gov.

Please let us know if you have any questions, thank you!

Megan Doran, Environmental Planner
Pronouns: (she/her)
Department of Parks and Recreation
County of San Diego, Land Use and Environment Group
C: 619-909-6309
SDParks.org | News Updates | Engage





Comment Letter I128 Response: Comment I128-1

I128-1 This comment expresses support for the project and acknowledges the revisions made in response to the Superior Court's June 9, 2025 Minute Order and January 20, 2026 Writ of Mandate. No changes to the 2026 Recirculated Draft EIR are needed.

Comment Letter I129: John Anderson, August 3, 2026

Comment Letter I129

From: John Anderson
Sent: Monday, August 3, 2026 10:18 AM
To: CEQA, CountyParks
Cc: John Anderson
Subject: [External] Alpine County Parks Project SCH#2021030196

I129-1

Megan - as discussed...

My wife and I FULLY SUPPORT this project and look forward having a nice park within walking distance from our home.

Please accept this message/feedback as positive and encouragement to proceed as quickly as possible .....It will be great to have a park with nice facilities. We especially look forward to the 'recreational courts' as part of the park.

Full Support
Full Speed Ahead
Thanks for all you do,
John and Leslie Anderson
619-944-3492

2093 Via Del Torrie
Alpine CA 91901

Comment Letter I129 Response: Comment I129-1

I129-1 This comment expresses support for the project and does not address the adequacy of the environmental analysis in the 2026 Recirculated Draft EIR. No changes to the 2026 Recirculated Draft EIR are needed.

Comment Letter I130: Dawn August, September 12, 2026

Comment Letter I130

From: Dawn August
To: CEQA_CountyParks
Subject: [External] reg comments on Alpine Sports Park
Date: Saturday, September 12, 2026 8:12:26 PM

To: Megan Doran

I130-1 I spent days and weeks last time when writing my letter on November 12, 2021 reviewing the hundreds of pages in the original EIR.
I unfortunately am not going to have that kind of time on your second round of revisions. The taxpayers of San Diego County do not have that luxury of time since most of us have to work. Your staff gets paid to create all of these reports and revisions at the expense of the taxpayers.

I130-2 I went into the Addendum Appendix II regarding Park Transportation. The original EIR report indicated that there would be an anticipated 480 cars per day traveling to this Regional Park.
Now in your revision you are comparing (this much larger park proposed in Alpine) to Hilton Head County Park located in Rancho San Diego, El Cajon. This is not comparable to what is being proposed in Alpine. That park is a 10 acre Neighborhood Park. I believe that your comparison is not a valid comparison. Could you please explain why you used this small park as a comparison to the larger park proposed in Alpine?

I130-3 I also still believe that the County is minimizing the safety issues of the location of this proposed park. The infrastructure does not support this location in a rural residential area with windy roads and blind spots. This will be a tremendous safety issue for children and adults in the area. I still do not believe that you have provided enough truthful statistics to warrant this location.

I130-4 I do not have the desire to read your revision on Wildfires in our area. Alpine is known for being in the very highest fire hazard zone. I do not believe that any thing that you proposed will change that issue. As Alpine residents, we can barely afford the high rates of fire insurance for our homes now. Once this regional park goes in we will have many more people from outside of our community coming here. Your representatives have stated that before in a zoom meeting that was on January 14, 2021 from 7PM to 8:30 PM. That the Alpine park would help with the overflow from other smaller County parks in San Diego area. A lot of people that do not reside in our community do not understand how easy it is to start a fire accidentally or negligently. With the volume of visitors coming in, this will not be able to be controlled. How will residential neighborhoods near the park be able to evacuate safely? Or will we have to shelter in place to accommodate the park visitors that most likely will be able to evacuate first? Our community has been through some horrific fires in the past, Mt Laguna fire, The Cedar fire and the West fire. Bringing more people/visitors into this rural residential area will put our local Alpineans in more danger.

I130-5 I see that you may be going to a septic system instead of extending sewer that far down in the rural community. Has this property had adequate percolation tests to support septic? In the past it was declared that the subject property has too much clay to perc. Would ground water be of concern with a septic system? Wastewater can leak into the soil and seep into nearby groundwater. This can introduce harmful substances such as bacteria, viruses, and nitrates into wells and aquifers.
I am not sure that these additional questions were addressed before. I do not remember seeing them in the original EIR. Fact, Alpine is known for the higher amount of days over the standard for the rest of San Diego for Ozone measurements. Source in 1977 San Diego APCD stated that Alpine's (Ozone) was 164 days over standard. The population at that time was significantly lower than now. Please see the statistic below regarding Alpine population. Has the Ozone levels been addressed in your original EIR or your revised one?
Sincerely,
Dawn August
Broker, Alpine Premier Properties
1411 Rock Terrace
Alpine, CA 91901
619 445-6246
russ-dawn@sdcoxmail.com

Alpine, California Population in San Diego County in 1977 The estimated population of Alpine, California (San Diego County) on July 1, 1977, was 1,000 residents. This figure comes from

the U.S. Census Bureau's *Current Population Reports, Series P-25, No. 818 —*

s

Alpine has a 2026 population of **15,755 which is a conservative estimate.**

Comment Letter I130 Response: Comments I130-1 through I130-5

I130-1 This comment details a personal experience with the public review process but does not address the adequacy of the environmental analysis in the 2026 Recirculated Draft EIR. Refer to responses I130-2 through I130-5 below regarding specific comments about the 2026 Recirculated Draft EIR.

I130-2 The commenter inquires about the project's comparison to Hilton Head County Park for the 2026 Recirculated Draft EIR's parking demand analysis. As described in MR-22 (Analog Park Selection) Hilton Head County Park is a suitable comparison and the difference in park size between Hilton Head County Park (10 acres) and Alpine Park (25 acres) is accounted for by a 2.5 multiplier. No changes to the 2026 Recirculated Draft EIR are needed.

I130-3 The commenter asserts that the County is minimizing the potential safety impacts of the project. Refer to MR-21 (Pedestrian and Bicyclist Safety); safety impacts to pedestrians and bicyclists would be less than significant. No changes to the 2026 Recirculated Draft EIR are needed.

I130-4 The commenter expresses concerns about wildfire safety, including increased ignition potential and emergency evacuation. Refer to MR-18 (Emergency Evacuation) regarding project impacts to emergency response and evacuation, which were not required to be analyzed in the 2026 Recirculated Draft EIR. Please also refer to MR-9 (Wildfire) in Volume 4 Chapter 3, *Response to Comments on the Draft EIR And Recirculated Draft EIR* for additional information on emergency evacuation. Also refer to MR-19 (Wildfire Ignition and Spread); the project would not exacerbate wildfire risk. No changes to the 2026 Recirculated Draft EIR are needed.

I130-5 The commenter inquires about the use of a septic system on the project site and local ozone levels. Refer to MR-16 (Scope of the RDEIR); these issues were not required to be analyzed in the 2026 Recirculated Draft EIR. No changes to the 2026 Recirculated Draft EIR are needed.

Comment Letter I131, George Barnett, July 31, 2026

Comment Letter I131

From: George Barnett
Sent: Friday, July 31, 2026 4:03 PM
To: CEQA, CountyParks
Subject: [External] Re: Alpine County Park Project - Recirculated Draft EIR for Public Review

I131-1 Hi, Megan
Thanks so much for this update.
Looks good. I now know too much about bats.
I will forward to those I know are interested.
George Barnett

On Jul 31, 2026, at 1:02 PM, CEQA, CountyParks <CountyParksCEQA@sdcounty.ca.gov> wrote:

Good afternoon,

The County of San Diego, Parks and Recreation Department is recirculating sections of the Draft Environmental Impact Report (EIR) for public review for the Alpine County Park Project pursuant to the California Environmental Quality Act. Please see attached for the Notice of Availability. The recirculated sections of the EIR along with supporting documents, together referred to as the 2026 Recirculated Draft EIR, can be accessed through the County Parks website by following this link: https://www.sdparks.org/content/sdparks/en/AboutUs/Plans/public-review-documents.html.

The public review period runs from today, July 31, 2026, through Monday, September 14, 2026. Written comments regarding the 2026 Recirculated Draft EIR must be received no later than **September 14, 2026 at 5:00 p.m.** Comments should be emailed to CountyParksCEQA@sdcounty.ca.gov.

Please let us know if you have any questions, thank you!

Megan Doran, Environmental Planner
Pronouns: (she/her)
Department of Parks and Recreation

County of San Diego, Land Use and Environment Group
C: 619-909-6309
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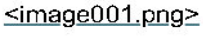
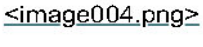




<Alpine_NOA_2026.pdf>

Comment Letter I131 Response: Comment I131-1

I131-1 This comment thanks the County for providing notice about the 2026 Recirculated Draft EIR but does not address the adequacy of the document's environmental analysis. No changes to the 2026 Recirculated Draft EIR are needed.

Comment Letter I132: Kymberly Bennett, July 31, 2026

Comment Letter I132

From: Kymberly Bennett
Sent: Friday, July 31, 2026 4:13 PM
To: CEQA, CountyParks
Subject: [External] Alpine Park

I132-1 No one in Alpine wants Wrights Field touched. Why on earth are you people still pouring money into a project no one wants?

Kymberly Bennett
619-517-0845

Comment Letter I132 Response: Comment I132-1

I132-1 This comment expresses general opposition to the project but does not address the adequacy of the environmental analysis in the 2026 Recirculated Draft EIR. No changes to the 2026 Recirculated Draft EIR are needed.

Comment Letter I133: Ellen Bergen, August 13, 2026

Comment Letter I133

From: Ellen
To: CEQA, CountyParks
Subject: [External] Alpine County Park Project
Date: Thursday, August 13, 2026 4:08:47 PM

I133-1 In reference to CH# 2021030196.

I am concerned about the proposed park development. Seems like too many activities for a nice quiet preserve. I have a few immediate questions

I133-2 1. Where will the primary entrance be located and the parking lot to support all these activities? I and my 3 neighbors live on Tavern Rd along side McQueen Middle school which we believe this is a private road and afraid this will become a freeway to the park. Right now, we just have a few morning walkers, a horse, and sometimes a bikes so it hasn't been too big of a problem. However, we have had late night people who violate the preserves hours. Do you plan on securing the access points at night? If not, this park will become a night time hang out for teenagers.

I133-3 2. It was mentioned in the proposal "all wheels". That can imply all electric/gas vehicles will also be allowed. A park is suppose to be relaxing fun place. But these types of "all wheels" will ruin that. Kids on these bikes are not responsible enough to abide by any rules, let alone the noise!

I133-4 3. BBQ pits run the risk of fires.

I133-5 4. When and where will an open forum be held ? I know a few residence that would like to voice their concerns.

I133-6 5. You mentioned the Back Country Land Trust (BCLT). That does not exist at 1951 Tavern Rd. That was a previous owners mailing address (for John Greene). Please do not use BCLT as a location in your proposal.

Respectfully,
Ellen Bergen

--
This email has been checked for viruses by AVG antivirus software.
www.avg.com

Comment Letter I133 Response: Comments I133-1 through I133-6

I133-1 This comment expresses opposition to the project and introduces the concerns raised in subsequent comments. Refer to responses I133-2 through I133-6 below regarding specific comments submitted on the 2026 Recirculated Draft EIR.

I133-2 This comment inquires about the location of the project's access points and nighttime security but does not address the adequacy of the environmental analysis in the 2026 Recirculated Draft EIR. Refer to MR-16 (Scope of the RDEIR); these issues were not required to be analyzed in the 2026 Recirculated Draft EIR. Nonetheless, the following information is provided to clarify the project's operational procedures.

The primary park entrance (Driveway #1) would be located on the eastern side of the property as a new leg of the South Grade Road and Calle de Compadres intersection, and the second driveway (Driveway #2) would include a new intersection at the southern end of the property. Both driveways would allow full access to the project site and the project's 240-space parking lot. The park would only be open from sunrise to sunset and includes gates at each entrance. Regarding nighttime security and management of the site, refer to MR-19 (Wildfire Ignition and Spread), which describes the project's on-site staffing. No changes to the 2026 Recirculated Draft EIR are needed.

I133-3 The commenter expresses opposition to the project's all-wheel park. To clarify, the all-wheel park is designed for non-motorized bicycles, roller skates, inline skates, skateboards, and scooters. No electric bikes, hoverboards, mopeds, or electric scooters would be allowed in the all-wheel park. Additionally, please refer to MR-16 (Scope of the RDEIR); issues related to noise were not required to be analyzed in the 2026 Recirculated Draft EIR. However, as described in Section 4.13.5.3 of Volume 2, MM-NOI-2 and MM-NOI-3 require operational rules and regulations to prevent significant noise impacts. No changes to the 2026 Recirculated Draft EIR are needed.

I133-4 The commenter asserts that barbecue pits run the risk of fires. While barbecue pits would be allowed at the park, a barbecue has a contained flame, which differs from an open flame associated with a campfire. As described under Section 4.9.4.3 and Section 4.20.6.3 in Volume 2, the use of barbecues would be prohibited when a Red Flag Warning has been issued, and on-site staff and park rangers would ensure the ignition-reducing measures described in MR-19 (Wildfire Ignition and Spread) are implemented. No open flames would be permitted on the project site, and barbecues would be appropriately shielded and contained. Impacts related to wildfire ignition would be less than significant, and no changes to the 2026 Recirculated Draft EIR are needed.

I133-5 The commenter inquires about additional opportunities to provide input but does not address the adequacy of the environmental analysis in the 2026 Recirculated Draft EIR. No changes to the 2026 Recirculated Draft EIR are needed. The 2026 Final EIR and Response to Comments received on the 2026 Recirculated Draft EIR will be published on the County Parks website (sdparks.org) at least 30 days prior to the County Board of Supervisors' consideration of the 2026 FEIR. The County Board of Supervisors' consideration will occur in a public meeting, currently anticipated for December 9, 2026. All individuals who have provided comments on the project at any stage (Notice

of Preparation, 2021 DEIR, 2022 RDEIR, 2026 Recirculated DEIR, and public meetings where a form of communication was provided to the County) will be notified in advance. The public can provide comments via e-comment, on the phone, or in person. Additional information on how to provide comments at Board of Supervisors' meetings can be found here: https://www.sandiegocounty.gov/content/sdc/bos/comment-at-board-meetings.html. In addition, County Parks always welcomes public comments and input on any projects via email at askparks.lue@sdcounty.ca.gov.

I133-6 This comment about the Back Country Land Trust (BCLT) does not address the adequacy of the environmental analysis in the 2026 Recirculated Draft EIR. The BCLT is still actively involved in Wright's Field Preserve. No changes to the 2026 Recirculated Draft EIR are needed.

Comment Letter I134: Adah Bohmfalk, September 13, 2026

Comment Letter I134

From: Adah Bohmfalk
To: CEQA, CountyParks
Subject: [External] Alpine Park Project (SCH No. 2021030196)
Date: Sunday, September 13, 2026 5:37:40 PM

Adah Bohmfalk
1330 Arnold Way
Alpine CA 91901

September 13, 2026
Megan Doran
Project Manager
Department of Parks and Recreation
County of San Diego, Parks and Recreation
5500 Overland Avenue, Suite 410, San Diego, CA 92123
By email to: CountyParksCEQA@sdcounty.ca.gov
RE: Alpine Park Project (SCH No. 2021030196)

Dear Ms. Doran,

I134-1 Thank you for the opportunity to comment on the Alpine Park Project's ("Project") Recirculated Draft Environmental Impact Report (DEIR). My husband and I are 25 year residents of Alpine and we love the small town feel and the open spaces and wildlife here. I have seen a lot of events and progress in our small town over the years: the Cedar Fire showed how easy it is to get into trouble and the Powerlink project taught me to not trust what I'm told. The current issue with using property adjacent to Wright's Field as a county park with hardscape for recreational skating and biking with lights at night and heavy traffic in the daytime is not a match for Alpine's character: not at all.

I134-2 Fire is a real thing here and easy evacuation is required for the preservation of the community. If there are 2,000 people and 250 cars parked there how will they evacuate? Emergency evacuation, especially with the numbers of children expected to be present, is guaranteed to be dicey at best. How can that many people safely exit the area? How many more lanes of traffic must we create to get those people out safely? And where will the easements be?

I134-3 One other issue is access to Wright's Field. Will hikers/walkers need to go through the skate park? Will there be a separate parking area for people to get to walk the trails there? Will the trails remain?

I134-4 The wildlife in the area to be built up and/or paved and over-populated with humans is essential to the entire ecosystem of that land. You know as well as anyone that an ecosystem runs on all critters present and damaging any one of them can lead to a cascade and eventual collapse. There are intricate and important species' interactions happening on that parcel. How can you guarantee that this won't happen here? There are unmitigated losses in the DEIR. How will the rest of the environment manage to right itself after such a huge disruption?

I134-5 Thank you very much for your time and attention.
I know many people who are as concerned as I am.

Sincerely,

Adah Bohmfalk

Comment Letter I134 Response: Comments I134-1 through I134-5

I134-1 The commenter expresses opposition to the project and states it is incompatible with the community's character due to the proposed all-wheels park, night lighting, and traffic. Refer to MR-16 (Scope of the RDEIR); these issues were not required to be analyzed in the 2026 Recirculated Draft EIR. Nonetheless, the following information is provided to clarify the project's operational characteristics.

Regarding night lighting, the park would only be open from sunrise to sunset. Use of the park at night is prohibited. There would be minimal lighting for security purposes, and all lighting would be turned off one hour after closing or use motion sensors to limit duration of lighting except in certain areas for safety per MM-AES-3. As described in Section 4.17.4.3 in Volume 2, intersections and roadway segments within the study area would operate at acceptable level of service (LOS) C or better with the addition of project traffic, and the project would not conflict with any programs, plans, ordinances, and policies addressing the circulation system. Please refer to MR-19 (Wildfire Ignition and Spread) for additional details on staffing and management of the park.

I134-2 The commenter expresses concern about emergency evacuation. Refer to MR-18 (Emergency Evacuation) regarding project impacts to emergency response and evacuation, which were not required to be analyzed in the 2026 Recirculated Draft EIR. Nonetheless, please refer to MR-9 (Wildfire) in Volume 4 Chapter 3, *Response to Comments on the Draft EIR And Recirculated Draft EIR* for additional information on emergency evacuation. No changes to the 2026 Recirculated Draft EIR are needed.

I134-3 The commenter asks if visitors of Wright's Field will need to access trails via the project and its proposed parking lot. Refer to MR-23 (Wright's Field Parking); visitors to Wright's Field would not be required to use the project's parking lot. Visitors who choose to use the project and its proposed parking lot can access County trails in the preserved area, which will ultimately connect to trails at Wright's Field, without going through the skate park.

I134-4 The commenter notes the ecological sensitivity of the project vicinity and asserts that there are unmitigated losses in the 2026 Recirculated Draft EIR. Refer to MR-16 (Scope of the RDEIR); biological resources issues other than western spadefoot and pallid bat were not required to be analyzed in the 2026 Recirculated Draft EIR. Volume 2, Section 4.4, *Biological Resources* of the 2026 Recirculated Draft EIR acknowledges the variety of vegetation communities on the project site, as depicted in Figure 4.4-1, *Vegetation Communities*. Special status species are also depicted in Figure 4.4-2, *Special-Status Plants* and Figure 4.4-3, *Special-Status Wildlife*. To ensure unmitigated losses to biological resources do not occur, Section 4.4 of Volume 2 identifies mitigation measures MM-BIO-1 through MM-BIO-10, which would reduce potential biological resources impacts to a less than significant level. No changes to the 2026 Recirculated Draft EIR are needed.

I134-5 This is a closing comment that reiterates the commenter's opposition to the project but does not address the adequacy of the environmental analysis in the 2026 Recirculated Draft EIR. No changes to the 2026 Recirculated Draft EIR are needed.

Comment Letter I135: Charles Bohmfalk, September 13, 2026

Comment Letter I135

From: Bohmfalk Financial Services
To: CEQA, CountyParks
Subject: [External] RE: Alpine Park Project (SCH No. 2021030196)
Date: Sunday, September 13, 2026 5:36:33 PM

1330 Arnold Way
Alpine, CA 91901

September 13, 2026

Megan Doran
Project Manager
Department of Parks and Recreation
County of San Diego, Parks and Recreation
5500 Overland Avenue, Suite 410, San Diego, CA 92123

By email to: CountyParksCEQA@sdcounty.ca.gov

RE: Alpine Park Project (SCH No. 2021030196)

Dear Ms. Doran,

Thank you for the opportunity to comment on the Alpine Park Project's ("Project") Recirculated Draft Environmental Impact Report (DEIR).

I135-1 I have been an Alpine resident for 25 years now and have seen many changes in Alpine over those years.

The Alpine Park Project was something I was looking forward to as an improvement in Alpine's open spaces. I have often taken walks with my wife at Wright's Field and we especially enjoy sunsets there.

I135-2 The proposal of a park project is welcome, but a skate park is altogether something else. The traffic and fire dangers are concerning.

I135-3 What has been planned for any emergency fire evacuation from the park and how will it affect emergency evacuations for Alpine residents in general?

I135-4 Traffic in and around South Grade Road and Palo Verde will certainly be impacted. What mitigation has been planned for that increase?

How will this affect access to Wright's Field and parking for those using only Wright's Field.

I135-5 These are some of the concerns I have and would like answers to.

Thank you for your time and attention.

Charles W Bohmfalk

Charles

Bohmfalk Financial Services
Tax Planning and Preparation Services
343 E Lexington Ave., Ste 106, El Cajon, CA 92020

(619) 302 2285 Tel
(866) 598-9884 Fax
cwbohmfalk@sbcglobal.net

Comment Letter I135 Response: Comments I135-1 through I135-5

I135-1 This is an introductory comment that describes the commenter's relationship with the project site. Refer to responses I135-2 through I135-5 below regarding specific comments on the 2026 Recirculated Draft EIR.

I135-2 The commenter notes general concerns about the skate park, traffic, and fire danger but does not address the adequacy of the environmental analysis in the 2026 Recirculated Draft EIR. As described in Sections 4.9.4, 4.17.4, and 4.20.6, impacts related to emergency evacuation, traffic, and wildfire would be less than significant without mitigation. Also refer to MR-18 (Emergency Evacuation), MR-19 (Wildfire Ignition and Spread), and MR-21 (Pedestrian and Bicyclist Safety) for additional information about the concerns raised in this comment. No changes to the 2026 Recirculated Draft EIR are needed.

I135-3 The commenter expresses concern about emergency evacuation. Refer to MR-18 (Emergency Evacuation) regarding project impacts to emergency response and evacuation, which were not required to be analyzed in the 2026 Recirculated Draft EIR. No changes to the 2026 Recirculated Draft EIR are needed. Please also refer to MR-9 (Wildfire) in Volume 4 Chapter 3, *Response to Comments on the Draft EIR And Recirculated Draft EIR* for additional information on emergency evacuation.

I135-4 The comment states that traffic at South Grade Road and Palo Verde will be affected, asks what mitigation has been planned, and asks how the project affects access to and parking for Wright's Field. Refer to MR-16 (Scope of the RDEIR); traffic congestion was not re-analyzed in the 2026 Recirculated Draft EIR, and none of the revisions made in response to the Writ affect the project's LOS analysis. Refer to MR-23 (Wright's Field Parking); visitors to Wright's Field would not be required to use the project's parking lot. No changes to the 2026 Recirculated Draft EIR are needed.

I135-5 This is a closing comment requesting answers to the concerns expressed above. No changes to the 2026 Recirculated Draft EIR are needed.

Comment Letter I136: Stephanie Brown, August 14, 2026

Comment Letter I136

From: Stephanie Brown
To: CEQA, CountyParks
Subject: [External] Alpine County Park Project SCH# 2021030196
Date: Friday, August 14, 2026 8:03:43 AM

To Whom It May Concern:

I136-1 As the widow of a Navy veteran, mother of two, and a longtime resident of Alpine, I strongly oppose this development project.

My late husband and I chose Alpine to retire and raise our sons precisely because it was a small, quiet community. No giant megastores and no heavy traffic. After 30 years of serving our country and moving every 2 to 3 years, we felt this environment was what we needed - for my husband's recovery and our quality of life.

I136-2 There is no parking to access Wright's Field on South Grade Road, and the proposed development would congest this two-lane road, which many residents use for work, shopping, and school.

I136-3 What is the cost/benefit to Alpine residents? Is this the best use of taxpayer funds? Does it improve the quality of our community or life? I would argue NO. Many Alpine residents agree with me.

Spend these taxpayer funds on fire mitigation. That remains the greatest threat to communities like Alpine!

I136-4 Thank you for your time and consideration.

Comment Letter I136 Response: Comments I136-1 through I136-4

I136-1 This is an introductory comment that expresses opposition and describes the commenter's relationship with the community but does not address the adequacy of the environmental analysis in the 2026 Recirculated Draft EIR. No changes to the 2026 Recirculated Draft EIR are needed.

I136-2 The commenter notes there is no existing parking for Wright's Field along South Grade Road and expresses concern about traffic congestion. The project would provide a 240-space parking lot, providing parking for the project. This parking could also be used by visitors to use County trails and access Wright's Field. Refer to MR-23 (Wright's Field Parking) for additional details on parking as it relates to Wright's Field. Impacts related to policy conflicts due to traffic congestion (level of service, or LOS) were not required to be analyzed in the 2026 Recirculated Draft EIR but were concluded to be less than significant without mitigation in Section 4.17.4.3 of the 2023 FEIR. No changes to the 2026 Recirculated Draft EIR are needed.

I136-3 The commenter expresses an opinion about taxpayer funds but does not address the adequacy of the environmental analysis in the 2026 Recirculated Draft EIR. No changes to the 2026 Recirculated Draft EIR are needed.

I136-4 This is a closing comment thanking the County for its time and consideration. No changes to the 2026 Recirculated Draft EIR are needed.

Comment Letter I137: Jan Charvat, August 22, 2026

Comment Letter I137

From: Jan Charvat
To: CEQA, CountyParks
Subject: [External] Alpine County Park Project - Recirculated Draft EIR for Public Review
Date: Saturday, August 22, 2026 2:56:22 PM

Hello,

I137-1 I want to comment on the updated project for an Alpine County Park. The project is still significantly over-dimensioned for our little town and I personally do not see the need, given that our elementary school closed due to low enrollment and the proposed high school was never built due to insufficient and dropping demographics numbers.

A few other youth-oriented projects that have been started and closed in Alpine, e.g. the Alpine Youth Center on Arnold Way, right where it merges into Alpine Blvd., due to lack of interest and low numbers. All of Wright's Field,

I137-2 as dry and empty as it may seem, is a favorite area for hiking, dog walking and even bicycling. The proposed park would cut off access to this open area from the East during its (the new park's) "closed hours", which seems very strange.

I137-3 Please reconsider the plans for the county park and either shrink it noticeably in size or eliminate it altogether from your plans.

Thank you!
Jan Charvat
resident of Alpine since 2001

Comment Letter I137 Response: Comments I137-1 through I137-3

I137-1 This comment expresses general concerns about community compatibility, size and demand for the project but does not address the adequacy of the environmental analysis in the 2026 Recirculated Draft EIR. Refer to MR-16 (Scope of the RDEIR) and MR-17 (Project Scope and Alternatives); these issues were not required to be analyzed in the 2026 Recirculated Draft EIR. No changes to the 2026 Recirculated Draft EIR are needed.

I137-2 This comment expresses opposition to the park's operating hours but does not address the adequacy of the environmental analysis in the 2026 Recirculated Draft EIR. The commenter indicates the park would limit access to Wright's Field. There is currently no authorized access to Wright's Field from this property. The park includes parking spaces and authorizes access to trails which ultimately connect to Wright's Field. No changes to the 2026 Recirculated Draft EIR are needed.

I137-3 This is a closing comment that reiterates the commenter's opposition to the project. No changes to the 2026 Recirculated Draft EIR are needed. Refer to MR-16 (Scope of the RDEIR) and MR-17 (Project Scope and Alternatives) for additional information on the need for the project and alternatives considered.

Comment Letter I138: Deana Conway, September 14, 2026

Comment Letter I138

From: Deana Conway
To: CEQA, CountyParks
Subject: [External] Alpine County Park Project – SCH#2021030196 and the 2026 Recirculated Draft EIR
Date: Monday, September 14, 2026 3:24:13 PM

Dear Megan Doran and County Parks Planning Team,

I138-1 We are writing regarding the Alpine County Park Project – SCH#2021030196 and the 2026 Recirculated Draft EIR.

We have lived in our home off Boulder Oaks Lane since 2000, directly adjacent to Wright's Field. We regularly walk the surrounding streets, including South Grade Road, and know firsthand how small, rural, and dangerous these roads are.

I138-2 Our primary concern is the scale of the proposed park and the **traffic it will bring into our neighborhood.** These roads were never designed for the traffic volume that could result from a facility with 250 parking spaces. We believe this would significantly change the quiet, rural character of the area and create safety concerns for residents, particularly pedestrians and children.

I138-3 We are glad to see that some of the more intensive features, including the turf and BBQ areas, have been removed from the revised plan. We're very concerned that BBQ areas were considered for this location. Alpine is a fire-prone community, and residents are already having significant difficulty obtaining and maintaining homeowners insurance because of wildfire risk. Adding public BBQ facilities to a natural area surrounded by homes seems particularly inappropriate given those circumstances. Fire safety should be a fundamental consideration in determining the use and scale of this property.

I138-4 We also have concerns about the type and volume of activity that a large public facility could bring into this small community. In our experience with larger recreational facilities in the county, increased public access can bring disorder, inappropriate activity, and individuals engaging in illegal activities that are inconsistent with the quiet, family-oriented nature of our neighborhood. We do not believe introducing that level of activity into this location is in the best interest of the community.

We believe Wright's Field should remain primarily a natural, quiet open-space area, rather than being developed into a destination requiring hundreds of parking spaces. If additional public access is pursued, the County should first address the significant pedestrian, bicycle, traffic, and fire-safety concerns associated with the location.

We respectfully ask the County to reduce the scale of the project, substantially reduce the proposed parking, carefully evaluate the traffic impacts on South Grade and the surrounding roads, and prioritize preservation of the natural character and safety of this area.

We have called this neighborhood home for more than 25 years and believe these concerns deserve serious consideration before moving forward with a project of this magnitude.

Thank you for your consideration.

Sincerely,

Deana & Jerry Conway
Alpine Residents and Adjacent Property Owners

Comment Letter I138 Response: Comments I138-1 through I138-4

I138-1 This comment introduces the roadway safety concerns detailed in the next comment. Refer to response I138-2 below.

I138-2 The commenter expresses concern that the project's traffic would change the character of the community and create safety concerns for pedestrians. Refer to MR-16 (Scope of the RDEIR); community character was not required to be analyzed in the 2026 Recirculated Draft EIR. Regarding pedestrian safety, refer to MR-21 (Pedestrian and Bicyclist Safety); safety impacts to pedestrians and bicyclists would be less than significant. As described in Section 4.17.4.3 in Volume 2, intersections and roadway segments within the study area would operate at acceptable level of service (LOS) C or better with the addition of project traffic, and the project would not conflict with any programs, plans, ordinances, and policies addressing the circulation system. No changes to the 2026 Recirculated Draft EIR are needed.

I138-3 The commenter expresses concern about fire safety and the use of barbecues on the project site. To clarify, the County has discretion to decide which parks may have campfires and barbecues. A barbecue has a contained flame, which differs from an open flame associated with a campfire. Open flames, such as campfires, would be prohibited, as described under Threshold 7 of Section 4.9.4.3 and Threshold 2 of Section 4.20.6.3 in Volume 2. The prohibition of campfires and open flames is an additional fire prevention measure that is proposed for the project. On-site staff and park rangers would ensure the ignition-reducing measures described in MR-19 (Wildfire Ignition and Spread) are implemented. Impacts related to wildfire ignition risks would be less than significant, and no changes to the 2026 Recirculated Draft EIR are needed.

I138-4 This comment expresses concern about the public safety implications of establishing a public park in the neighborhood and reiterates concerns about pedestrian/bicycle safety, traffic, and fire safety. Refer to MR-16 (Scope of the RDEIR); crime was not required to be analyzed in the 2026 Recirculated Draft EIR. Regarding fire safety, refer to MR-19 (Wildfire Ignition and Spread), which describes the project's on-site staffing. Responses I138-2 and I138-3 above further address community character, traffic safety, and fire safety. No changes to the 2026 Recirculated Draft EIR are needed.

Comment Letter I139: Jerry Conway, September 14, 2026

Comment Letter I139

From: jerry conway
To: CEQA, CountyParks
Subject: [External] Alpine park
Date: Monday, September 14, 2026 4:57:50 PM

Dear Megan Doran and County Parks Planning Team,

I139-1 We are writing regarding the Alpine County Park Project – SCH#2021030196 and the 2026 Recirculated Draft EIR.

We have lived in our home off Boulder Oaks Lane since 2000, directly adjacent to Wright's Field. We regularly walk the surrounding streets, including South Grade Road, and know firsthand how small, rural, and dangerous these roads are.

I139-2 Our primary concern is the scale of the proposed park and the **traffic it will bring into our neighborhood.** These roads were never designed for the traffic volume that could result from a facility with 250 parking spaces. We believe this would significantly change the quiet, rural character of the area and create safety concerns for residents, particularly pedestrians and children.

I139-3 We are glad to see that some of the more intensive features, including the turf and BBQ areas, have been removed from the revised plan. We're very concerned that BBQ areas were considered for this location. Alpine is a fire-prone community, and residents are already having significant difficulty obtaining and maintaining homeowners insurance because of wildfire risk. Adding public BBQ facilities to a natural area surrounded by homes seems particularly inappropriate given those circumstances. Fire safety should be a fundamental consideration in determining the use and scale of this property.

We also have concerns about the type and volume of activity that a large public facility could bring into this small community. In our experience with larger recreational facilities in the county, increased public access can bring disorder, inappropriate activity, and individuals engaging in illegal activities that are inconsistent with the quiet, family-oriented nature of our neighborhood. We do not believe introducing that level of activity into this location is in the best interest of the community.

I139-4 We believe Wright's Field should remain primarily a natural, quiet open-space area, rather than being developed into a destination requiring hundreds of parking spaces. If additional public access is pursued, the County should first address the significant pedestrian, bicycle, traffic, and fire-safety concerns associated with the location.

We respectfully ask the County to reduce the scale of the project, substantially reduce the proposed parking, carefully evaluate the traffic impacts on South Grade and the surrounding roads, and prioritize preservation of the natural character and safety of this area.

We have called this neighborhood home for more than 25 years and believe these concerns deserve serious consideration before moving forward with a project of this magnitude.

Thank you for your consideration.

Sincerely,

Deana & Jerry Conway

Alpine Residents and Adjacent Property Owners

Sent from my iPhone

Comment Letter I139 Response: Comments I139-1 through I139-4

I139-1 This comment introduces the roadway safety concerns detailed in the next comment. Refer to response I138-2 below.

I139-2 The commenter expresses concern that the project's traffic would change the character of the community and create safety concerns for pedestrians. CEQA requires an analysis of a project's potential effects on the environment. Refer to MR-16 (Scope of the RDEIR); community character was not required to be analyzed in the 2026 Recirculated Draft EIR. Regarding pedestrian safety, refer to MR-21 (Pedestrian and Bicyclist Safety); safety impacts to pedestrians and bicyclists would be less than significant. As described in Section 4.17.4.3 in Volume 2, intersections and roadway segments within the study area would operate at acceptable level of service (LOS) C or better with the addition of project traffic, and the project would not conflict with any programs, plans, ordinances, and policies addressing the circulation system. No changes to the 2026 Recirculated Draft EIR are needed.

I139-3 The commenter expresses concern about fire safety and the use of barbecues on the project site. To clarify, the County has discretion to decide which parks may have campfires and barbecues. A barbecue has a contained flame, which differs from an open flame associated with a campfire. Open flames, such as campfires, would be prohibited, as described under Threshold 7 of Section 4.9.4.3 and Threshold 2 of Section 4.20.6.3 in Volume 2. The prohibition of campfires and open flames is an additional fire prevention measure that is proposed for the project. On-site staff and park rangers would ensure the ignition-reducing measures described in MR-19 (Wildfire Ignition and Spread) are implemented. Impacts related to wildfire ignition would be less than significant, and no changes to the 2026 Recirculated Draft EIR are needed.

I139-4 This comment expresses concern about public safety and reiterates concerns about pedestrian/bicycle safety, traffic, and fire safety. Refer to MR-16 (Scope of the RDEIR); crime was not required to be analyzed in the 2026 Recirculated Draft EIR. Regarding fire safety, refer to MR-19 (Wildfire Ignition and Spread), which describes the project's on-site staffing. Responses I138-2 and I138-3 above further address quality of life, traffic safety, and fire safety. No changes to the 2026 Recirculated Draft EIR are needed.

Comment Letter I140: Anne Craig, September 8, 2026

Comment Letter I140

From: Anne Craig
To: CEQA, CountyParks
Subject: [External] RE: Alpine Park Project (SCH No. 2021030196)
Date: Tuesday, September 8, 2026 2:49:41 PM

Anne Craig
420 Summerhill View, Alpine. CA 91901

September 8, 2026

To: Megan Doran
Project Manager
Department of Parks and Recreation
County of San Diego, Parks and Recreation
5500 Overland Avenue, Suite 410, San Diego, CA 92123
By email to: CountyParksCEQA@sdcounty.ca.gov

RE: Alpine Park Project (SCH No. 2021030196)

Dear Ms. Doran,

I140-1 Thank you for the opportunity to comment on the Alpine Park Project's Recirculated Draft Environmental Impact Report (DEIR). My name is Anne Craig. My husband and I have lived in Alpine for 18 years.

My experience in Alpine goes beyond being a resident. I'm a community volunteer for several charitable organizations and regularly traverse Alpine to help my fellow community members.

I140-2 The first issue I have with the DEIR is the lack of detailed safety and security measures for residents: Having a large park next to primary residential areas invites the unhoused and potentially dangerous persons, including drug users, to loiter and become a long-term nuisance.

The second issue is the cost and waste of precious water resources to maintain the proposed 7-8 acres of grassy areas. Reclaimed water or not, Alpine taxpayers will bear the brunt of such costs. In today's economy, this is an unacceptable burden and hasn't been properly addressed.

Aside from safety, security and water cost/waste, the overall cost to taxpayers for this project has been ignored. Why are taxpayers footing the bill for a county park in Alpine when there are residents who face food insecurity and/or are on the edge of losing housing? My Board Supervisor has complained about runaway spending and budget shortfalls while demanding cuts to essential services, yet that Supervisor is pushing this vanity project with projected cost of $43+ million. It's already cost taxpayers hundreds of thousands of dollars in court fees and penalties. That $43 million should go to fund essential services in Alpine for every day people.

I140-3 Thank you for taking the time to read my input. I'd like to receive all notices relating to this project: please email to anneadem75@gmail.com

Sincerely,

Anne Craig – Alpine Resident

Comment Letter I140 Response: Comments I140-1 through I140-3

I140-1 This is an introductory comment that describes the commenter's relationship with the community but does not address the adequacy of the environmental analysis in the 2026 Recirculated Draft EIR. No changes to the 2026 Recirculated Draft EIR are needed.

I140-2 The commenter expresses concerns about public safety, water resources, and taxpayer costs. Refer to MR-16 (Scope of the RDEIR); these issues were not required to be analyzed in the 2026 Recirculated Draft EIR. While public safety is beyond the scope of the 2026 Recirculated Draft EIR, please refer to MR-19 (Wildfire Ignition and Spread) regarding the security measures that would be implemented on the project site, including a live-on volunteer, maintenance staff, and park ranger to monitor and enforce regulations. No changes to the 2026 Recirculated Draft EIR are needed.

I140-3 This is a closing comment thanking the County for its time and requesting updates about the project. No changes to the 2026 Recirculated Draft EIR are needed.

Comment Letter I141: Mary Davis, September 14, 2026

Comment Letter I141

From: Mary Davis
To: CEQA_CountyParks
Subject: [External] Input: New Alpine Community Park
Date: Monday, September 14, 2026 1:52:19 PM
Attachments: image.png

Megan Doran & County Staff:

I141-1 Below is my input for the new Alpine Community Park:

I141-2 **1. FIRE SAFETY:** *Thank you for getting rid of the barbeques*. A visitor's desire to grill a hamburger should not supersede my right to not have my house burn down.

I141-3 **2. ARCHERY: Please consider adding an archery range if there is not one included.** That is a practical recreational activity that will build skills and help entice folks away from their electronic devices.

3. SAFE BIKE ACCESS: I am still concerned about the park becoming (from a legal standpoint) an "attractive nuisance", particularly in light of California's push for 'micro-mobility'. More kids are riding e-bikes, which in my belief is an emerging public health crisis.

I141-4 *If the County is going to entice children to a park, they should provide a safe way to get there.* This means perhaps widening South Grade and putting in a dedicated, separate PROTECTED bike lane (which is NOT a white line).

4. COMMUNITY MOBILITY & CONNECTIVITY VISION: The bike lane could be part of what locals have called 'The Alpine Loop' - a vision for a dedicated, protected bikeway from Tavern at Alpine Blvd., south to South Grade, east around Wright's Field and connecting back to Alpine Blvd., then westbound on Alpine Blvd. back to Tavern Rd.

Alpine already has a lot of bike activity on Peutz Valley, but this would provide a less physically demanding course for people. It would also tie in beautifully to the new park. Please consider this option, and coordinate with SANDAG.

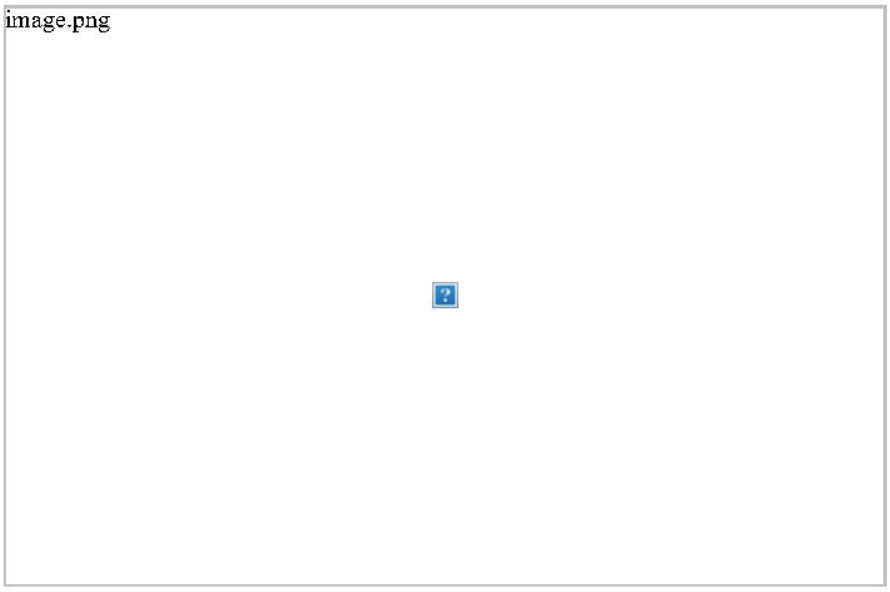
I141-5 **5. OVERNIGHT SAFETY:** I continue to be concerned about park safety, particularly at night when it is supposed to be closed. There is a horrific problem in the City of San Diego with overnight parking at Mission Bay and Harbor Island, so I do not want to see our park turned into a haven for the homeless or for drug use.

6. TRIBUTE BENCHES: Opportunities for memorial tribute park benches. I would like to see benches strategically placed throughout the park so people can

I141-5 cont.

enjoy the phenomenal sunsets that Wright's Field offers. Watching the orange glow behind the silhouette of gnarled Englemann Oak branches is God's majesty on display.

Below is an example of what I have in mind; and more can be found at: https://www.superiorlasercutting.com/memorial-benches/



I141-6

7. FULL PARK FUNDING & FRUITION: Please prioritize full funding & fruition/completion of this project.

We in the Unincorporated Area are fatigued by hearing politicians cry poor (that they are out of money), while increasingly funding unnecessary/non-mandated things that are merely partisan wants.

With the County budget having risen as astronomically as it has been (40% in six years), the allocation for Unincorporated Areas should be rising proportionately as well.

I am happy to discuss my concerns in more detail if needed. Feel free to reach out to see how we can work together to make Alpine a safe, desirable community.

Kind Regards,

Mary Davis
Alpine

Comment Letter I141 Response: Comments I141-1 through I141-6

I141-1 This comment introduces subsequent comments. Refer to responses I141-2 through I141-6.

I141-2 The commenter expresses concern about fire safety and the use of barbecues on the project site. To clarify, barbecues are an allowed use at the proposed park. A barbecue has a contained flame, which differs from an open flame associated with a campfire. As described under Threshold 7 of Section 4.9.4.3 and Threshold 2 of Section 4.20.6.3 in Volume 2, open flames would be prohibited, and on-site staff and park rangers would ensure the ignition-reducing measures described in MR-19 (Wildfire Ignition and Spread) are implemented. Impacts related to wildfire ignition risk would be less than significant, and no changes to the 2026 Recirculated Draft EIR are needed.

I141-3 This comment requests an archery range on the project site but does not address the adequacy of the environmental analysis in the 2026 Recirculated Draft EIR. No changes to the 2026 Recirculated Draft EIR are needed.

I141-4 The commenter expresses concerns about bicycle safety, requests a protected bike lane along South Grade Road, and suggests the County implement a more cohesive connectivity plan for bicyclists in coordination with the San Diego Association of Governments. Refer to MR-21 (Pedestrian and Bicyclist Safety); safety impacts to pedestrians and bicyclists would be less than significant. The Alpine Loop project referenced by the commenter is a separate future planned project which is not currently funded. No changes to the 2026 Recirculated Draft EIR are needed.

I141-5 The commenter expresses concerns about crime on the project site and requests memorial tribute park benches. Refer to MR-16 (Scope of the RDEIR); these issues were not required to be analyzed in the 2026 Recirculated Draft EIR. While public safety is beyond the scope of the 2026 Recirculated Draft EIR, please refer to MR-19 (Wildfire Ignition and Spread) regarding the security measures that would be implemented on the project site, including a live-on volunteer, maintenance staff, and park ranger to monitor and enforce regulations. No changes to the 2026 Recirculated Draft EIR are needed. Regarding tribute/memorial benches, the County does not currently have a formal program for memorial benches. They are considered on a case-by-case basis and may be added at specific park if the park is managed by the County and is a property that needs a bench. Requests should be sent to **Askparks.lue@sdcounty.ca.gov** for consideration.

I141-6 This is a closing comment that urges completion of the project but does not address the adequacy of the environmental analysis in the 2026 Recirculated Draft EIR. No changes to the 2026 Recirculated Draft EIR are needed.

Comment Letter I142: Chris Fuchs, September 14, 2026

Comment Letter I142

From: Chris Fuchs
To: CEQA, CountyParks
Subject: [External] Alpine County Park Project - SCH#2021030196
Date: Monday, September 14, 2026 4:44:39 PM

Attn: Megan Doran

I142-1 I would like to add my comments regarding the proposed Alpine County Park.
I have lived in Alpine long enough to know that fire and evacuation are not hypothetical concerns here. When there is a wildfire, there are only so many ways in and out, and traffic can become a serious problem very quickly. Building a park of this size that is intended to draw more people and cars into this part of Alpine does not make sense to me from a public safety standpoint.

I142-2 I also think the proposed park is simply too much for the area. There is a big difference between preserving land for trails, open space and some community recreation versus building sports fields, courts, a bike area, dog park, facilities and numerous other developed uses all in one location.

Wright's Field and the surrounding open space are part of what makes this area special. Wildlife, habitat and the rural environment should carry more weight than adding as many recreational amenities as possible.

I would much rather see the County scale this project back significantly and preserve more of the property as natural open space. Bigger is not always better, especially in a rural, fire-prone community like Alpine.

Please take the concerns of the people who actually live here seriously when reconsidering this project.

Thank you,

Chris Fuchs
Alpine Resident

Comment Letter I142 Response: Comments I142-1 through I142-2

I142-1 The commenter expresses concerns about emergency evacuation. Refer to MR-18 (Emergency Evacuation) regarding project impacts to emergency response and evacuation, which were not required to be analyzed in the 2026 Recirculated Draft EIR. Please also refer to MR-9 (Wildfire) in Volume 4 Chapter 3, *Response to Comments on the Draft EIR And Recirculated Draft EIR* for additional information on emergency evacuation. No changes to the 2026 Recirculated Draft EIR are needed.

I142-2 The commenter asserts that the project is too large for the surrounding area and notes the fire-prone nature of the community. Refer to MR-16 (Scope of the RDEIR); community character was not required to be analyzed in the 2026 Recirculated Draft EIR. Also refer to MR-19 (Wildfire Ignition and Spread); the project would implement fire prevention measures to reduce wildfire risk on the project site compared to existing conditions. Also refer to MR-17 (Project Scope and Alternatives) on the need for the project and alternatives considered. No changes to the 2026 Recirculated Draft EIR are needed.

Comment Letter I143: Michelle Fuchs, September 14, 2026

Comment Letter I143

From: Michelle Fuchs
To: CEQA, CountyParks
Subject: [External] Alpine County Park
Date: Monday, September 14, 2026 4:50:21 PM

I oppose the proposed Alpine County Park Project in its current form.

I143-1 I moved to Alpine because of its rural character, open space, wildlife, and lower-density way of life. A large active-use park of this scale isn't a good fit for Alpine for this space.

I143-2 I am still concerned about increased traffic, public safety and emergency evacuation especially because I live in the old ranch area and there is really only one way out. Alpine is already an extremely fire-prone community and adding a major facility like this will make it worse.

I143-3 The impact of this level of development will also affect the surrounding habitat and wildlife, particularly given the park's location directly adjacent to Wright's Field Preserve.

I143-4 I wouldn't mind a natural park setting with trails and outdoor recreation, but this project is wrong for this location. I strongly urge the County to reconsider the scale and active uses proposed and instead prioritize preservation of the land, wildlife habitat, and rural character of Alpine.

Thank you,
Michelle Fuchs

Comment Letter I143 Response: Comments I143-1 through I143-4

I143-1 The commenter expresses opposition to the project and states it is incompatible with the community's character. Refer to MR-16 (Scope of the RDEIR); community character was not required to be analyzed in the 2026 Recirculated Draft EIR. No changes to the 2026 Recirculated Draft EIR are needed.

I143-2 The commenter expresses concerns about traffic, public safety, and emergency evacuation. Refer to MR-16 (Scope of the RDEIR); these issues were not required to be analyzed in the 2026 Recirculated Draft EIR. Regarding traffic, none of the revisions made in response to the Writ affect the project's LOS analysis. While public safety is beyond the scope of the 2026 Recirculated Draft EIR, please refer to MR-19 (Wildfire Ignition and Spread) regarding the security measures that would be implemented on the project site, including a live-on volunteer, maintenance staff, and park ranger to monitor and enforce regulations. Refer to MR-18 (Emergency Evacuation) regarding project impacts to emergency response and evacuation, which were not required to be analyzed in the 2026 Recirculated Draft EIR. Please also refer to MR-9 (Wildfire) in Volume 4 Chapter 3, *Response to Comments on the Draft EIR And Recirculated Draft EIR* for additional information on emergency evacuation. No changes to the 2026 Recirculated Draft EIR are needed.

I143-3 The commenter states that the project would affect the surrounding habitat and wildlife but does not raise a specific issue with the analysis in the 2026 Recirculated Draft EIR. Refer to MR-16 (Scope of the RDEIR), biological resources issues other than pallid bat and western spadefoot were not required to be analyzed in the 2026 Recirculated Draft EIR. Additionally, refer to Section 4.4.4 of Volume 2, which concluded that all impacts to biological resources would be less than significant with mitigation incorporated. No changes to the 2026 Recirculated Draft EIR are needed.

I143-4 This comment reiterates the commenter's opposition to the project but does not address the adequacy of the environmental analysis in the 2026 Recirculated Draft EIR. Refer to MR-17 (Project Scope and Alternatives) on the need for the project and alternatives considered. No changes to the 2026 Recirculated Draft EIR are needed.

Comment Letter I144: Michael Funtas, September 11, 2026

Comment Letter I144

From: Michael Funtas
To: CEQA, CountyParks
Subject: [External] Alpine Park Project (SCH No. 2021030196)
Date: Friday, September 11, 2026 11:24:08 AM

Dear Ms. Doran,

I144-1 I would like to provide comments on the Alpine Park Project. My wife and I have traveled a lot and have been to parks all over the world. Parks are for everyone of all ages. The Alpine Park as proposed has areas for young people who are in school for over half the year during the day and has very little for retired adults who would like to spend some time in a park. The county built the Lindo Lake Park in Lakeside with walking paths, picnic areas, and a friendly, family atmosphere. Bear in mind that Alpine has a lot of retired people who would like to go for a walk in a safe area. I don't even see a walking path. The proposed park is mostly for school age children and teens and there are not that many here. There are not even enough children here for a county high school. I was at the original planning meeting in 2019 when the county proposed a park for the community. This is not a park for the community. It is a park for a few people who want to ride skateboards and dirt bikes. There are baseball fields and soccer fields very close by at Joan McQueen School. Maybe the county could improve those fields for the very few who want to play soccer or baseball. There are other soccer and baseball fields in the Alpine Community. I'm sorry, but I am not for this very poorly designed park.

Sincerely,

Michael Funtas

Comment Letter I144 Response: Comment I144-1

I144-1 This comment expresses opposition to the project and elements of its design but does not address the adequacy of the environmental analysis in the 2026 Recirculated Draft EIR. Refer to MR-16 (Scope of the RDEIR); these issues were not required to be analyzed in the 2026 Recirculated Draft EIR. No changes to the 2026 Recirculated Draft EIR are needed.

Comment Letter I145: Sean Goodin, September 11, 2026

Comment Letter I145

From: Sean Goodin
To: CEQA_CountyParks
Cc: s.goodin@att.net; arlesblair@yahoo.com
Subject: [External] Public Comment – Alpine County Park Project, SCH No. 2021030196
Date: Friday, September 11, 2026 3:07:29 PM

2955 Verde View Rd.
Alpine, CA 91901

September 11, 2026

Megan Doran
Project Manager
County of San Diego Department of Parks and Recreation
5510 Overland Avenue, Suite 270
San Diego, CA 92123

By email: CountyParksCEQA@sdcounty.ca.gov

RE: Alpine County Park Project – SCH No. 2021030196
Comments on the 2026 Recirculated Draft Environmental Impact Report

Dear Ms. Doran,

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

I145-1

My family and I live in Alpine and are very familiar with South Grade Road, Tavern Road, Wright's Field and the area surrounding the proposed park as we live 1.4 miles away. We support parks and recreation in Alpine. Our concern is not whether the community should have recreational opportunities. Our concern is whether this particular property needs to be developed to the extent currently proposed when there may be better places for some of the active uses.

After reviewing the revised sections of the DEIR, I am especially concerned about the impacts to western spadefoot and bat habitat, the additional traffic on South Grade Road, pedestrian safety, and the effect the project could have during a wildfire evacuation.

I also do not believe the County has adequately explained why existing or underused recreational properties in Alpine could not absorb at least some of the proposed active recreation.

I145-2

Biological Resources

Appendix D2 states that a western spadefoot breeding pool identified as AP-7 is located within the proposed active park area and would be filled during construction. A western spadefoot egg mass was previously found there, and three adult western spadefoot were observed on the County property during later surveys. (Appendix D2, p. 4.)

That raises a fairly simple question for me:

If the County knows this particular pool has actually been used for breeding, why fill it at all?

I understand that mitigation and replacement habitat are proposed. What I do not understand is why avoiding the impact is not the first choice. Creating a new pool somewhere else does not guarantee that western spadefoot will use it in the same way they have already used AP-7.

I145-2 cont.

What evidence does the County have that the replacement habitat will successfully replace the breeding habitat that will be lost?

I would also like to know whether the active park layout was reconsidered after this information became available. Could the active footprint be reduced or moved enough to preserve AP-7 and the surrounding habitat?

The bat impacts are also concerning. Appendix D2 states that approximately 22.4 acres of habitat used or potentially used by sensitive bat species would be lost. The document specifically discusses pallid bat foraging habitat and notes how limited known pallid bat colonies are in San Diego County. (Appendix D2, p. 12.)

I145-3

The proposed mitigation includes habitat preservation and bat boxes, but a bat box does not replace more than 20 acres of feeding habitat.

How much of this habitat loss could be avoided by reducing the amount of active development on the property?

That seems particularly important when some of the recreational uses might be placed on property that has already been developed.

Fire Risk

Section 4.9 acknowledges that bringing more people onto the property creates additional opportunities for human-caused fires. The County proposes to manage that risk through rules, signs, vegetation management, ranger presence, maintenance staff and other fire-prevention measures. (Section 4.9, pp. 4.9-29–4.9-30.)

I145-4

Those are all reasonable precautions, but they depend heavily on people following the rules and staff being present to enforce them.

What level of staffing is actually guaranteed once the park is open?

Will a ranger or other responsible employee be present whenever the park is open? If not, how does the County account for periods when there is no one there to enforce restrictions on smoking, open flames, fireworks or other prohibited activities?

I145-5

I would also like to understand how the County concluded that the increased human activity does not require additional mitigation when the DEIR itself acknowledges that more visitors create more opportunities for ignition.

I145-6

Wildfire Evacuation

The evacuation analysis is probably the biggest concern for my family.

Section 4.20 estimates that evacuation of existing land uses through South Grade Road and Alpine Boulevard could take approximately 2 hours and 31 minutes. With the project, that increases to approximately 2 hours and 40 minutes. Under the cumulative scenario, the project adds as much as 12 minutes depending on the assumptions used. (Section 4.20, p. 4.20-31.)

I understand the DEIR says there is no established CEQA standard stating exactly how many additional minutes would be considered significant.

But that does not answer the practical question:

During an actual wildfire, why should Alpine residents consider another 8, 9 or 12 minutes of evacuation time acceptable?

I145-6 cont.

In Alpine, wildfire is not an abstract possibility. We know how quickly conditions can change.

I would like the County to explain how the evacuation analysis accounts for real-world problems such as accidents, stalled vehicles, reduced visibility, emergency vehicles traveling in the opposite direction, people evacuating animals, and large vehicles or horse trailers attempting to leave at the same time.

Appendix J1 specifically discusses the possibility of trailers and animals needing to evacuate from the park.

Were those types of vehicles actually included in the traffic assumptions used to calculate evacuation times?

If reducing the active portion of the park would reduce the number of people and vehicles that need to evacuate this location, I believe the County should seriously consider that option.

South Grade Road and Traffic Safety

Section 4.17 states that the northeastbound approach to Driveway #2 does not currently meet the County's corner sight-distance standard. Vegetation would need to be cleared and rock or boulder outcroppings would need to be removed or graded to provide the required visibility. (Section 4.17, pp. 4.17-14–4.17-15.)

I145-7

That may solve the problem when the park is initially built, but vegetation grows back.

Who will be responsible for regularly inspecting and maintaining that sight distance after the park opens?

Is there a required inspection schedule? What happens if vegetation or another obstruction reduces visibility again?

I am also concerned that South Grade Road is still, at its core, a rural road. The project would bring more cars, pedestrians, bicyclists and families with children into an area that was not originally designed to function like the entrance to a large active park.

I145-8

The transportation addendum discusses several possible pedestrian improvements, including a traffic signal, pedestrian hybrid beacon and rectangular rapid-flashing beacon. It appears those

improvements may be considered later depending on conditions after the park opens.

That approach concerns me.

Why wait until after the park opens to find out whether additional pedestrian protection is necessary?

I145-8 cont.

If the County intends to monitor conditions after opening, what exactly will trigger an improvement? Will it be traffic volume, pedestrian counts, vehicle speed, an accident, or some combination of those factors?

I would much rather see the County build the safest reasonable crossing from the beginning than wait for experience to show that more protection was needed.

Existing Fields and Recreation Sites

This is an issue I believe deserves much more attention.

There is already a baseball field near South Grade Road and Tavern Road that my family regularly sees sitting unused or significantly underused. I understand that the property may be privately owned. That does not mean it should simply be ignored.

Has the County contacted the owner to determine whether that field could be leased, purchased, improved or operated through some type of joint-use agreement?

There are also existing fields associated with Alpine school properties.

The County has already worked with Alpine Union School District on recreational facilities, including the improvements at Joan MacQueen Middle School. There are also fields associated with the former AUSD property and other school sites in the community.

I145-9

I am not suggesting that one existing field can replace everything proposed for the new park.

What I am asking is whether the County has really looked at all of these properties together.

Has the County prepared an inventory showing every existing recreational field in Alpine, who owns it, how often it is actually being used, when it is available, what condition it is in and what it would cost to improve it?

If that analysis exists, I would like to see it.

If it does not, I believe it should be completed before the County permanently converts more undeveloped land into active recreation.

The County's own information says additional baseball fields are needed in Alpine. What I have not seen is the actual utilization data showing that the fields we already have are being used to their reasonable capacity.

What scheduling or utilization information supports the conclusion that new fields must be constructed on this property?

I145-9 cont.

That is important because improving an existing field is very different environmentally from grading open land, removing habitat, adding parking and creating additional traffic on South Grade Road.

A Better Balance

My family's preference is that the South Grade property remain primarily open space, with trails and passive recreation that complement Wright's Field.

That does not mean Alpine should go without active recreation.

It means we should first make the best use of land that has already been disturbed.

Some active recreation may still make sense on the South Grade property. But given what the Recirculated DEIR now tells us about wildlife habitat, wildfire risk, evacuation time and roadway safety, I believe the County should take another look at how much active development is really necessary.

How much could the active footprint be reduced if existing baseball fields and school facilities were improved or shared?

How many acres of habitat could be preserved as a result?

How much park-generated traffic and evacuation demand could be eliminated?

I145-10

Those questions seem worth answering before making a permanent decision about this property.

My family is not opposed to parks, youth sports or investment in Alpine. We simply believe there is a better balance available: preserve more of this particular property as open space and use existing developed sites for active recreation wherever reasonably possible.

Once open land and functioning habitat are graded and developed, that decision is difficult to reverse. An existing ballfield, on the other hand, can be repaired, improved and put back into productive use.

I respectfully ask the County to address the questions above as part of its response to comments and reconsider whether the proposed level of active development is necessary in light of the impacts identified in the 2026 Recirculated DEIR.

Thank you for considering my comments and for including this letter in the administrative record for the Alpine County Park Project, SCH No. 2021030196.

Please send all future notices regarding this project to:

s.goodin@att.net

Sincerely,
Sean Goodin

Comment Letter I145 Response: Comments I145-1 through I145-10

I145-1 This is an introductory comment that describes the commenter's relationship with the community and introduces the concerns detailed in subsequent comments. Refer to responses I145-2 through I145-10 below.

I145-2 The commenter asks why western spadefoot breeding pool AP-7 is planned to be filled during construction and if alternative layouts had been considered to avoid the pool. Refer to MR-24 (Breeding Pool AP-7). The commenter also requests information on whether the active park layout was reconsidered after egg masses were discovered in AP-7. Refer to MR-17 (Project Scope and Alternatives) regarding the project's design. Breeding pool AP-7 is correctly treated as a biologically significant resource requiring mitigation, and no changes to the 2026 Recirculated Draft EIR are needed.

I145-3 The commenter expresses concern about the loss of potential pallid bat habitat and asks how much habitat loss could be avoided by reducing the amount of active development on the project site. It is likely that reducing the project's impact footprint would reduce the amount of potential pallid bat habitat impacted by the project, as described in FEIR Sections 6.5.4 and 6.5.5. However, a reduced project alternative or passive park alternative would not meet the project objectives to the same extent as the proposed project, and the project's alternatives analysis was not required to be analyzed in the 2026 Recirculated Draft EIR, as described in MR-16 (Scope of RDEIR) and MR-17 (Project Scope and Alternatives). Additionally, as described in MR-16 (Scope of the RDEIR), the bat boxes were not a subject of the Writ, and no further response is required. Regardless, the bat boxes are not intended to replace foraging habitat. Rather, bat boxes are a measure to provide additional roosting opportunities, while habitat preservation and restoration are intended to address habitat-related impacts. The 2026 Recirculated Draft EIR provides mitigation, specifically MM-BIO-7, MM-BIO-8, and MM-BIO-9 to address potential impacts to pallid bat and reduces those impacts to less than significant, and no changes to the 2026 Recirculated Draft EIR are needed.

I145-4 The commenter expresses concern about fire risk and regulation enforcement on the project site. Refer to MR-19 (Wildfire Ignition and Spread); the project would not exacerbate wildfire risk. No changes to the 2026 Recirculated Draft EIR are needed.

I145-5 The commenter inquires about how an increase in human activity on the project site does not require mitigation for ignition risk. Refer to MR-19 (Wildfire Ignition and Spread); the project would not exacerbate wildfire risk. No changes to the 2026 Recirculated Draft EIR are needed.

I145-6 The commenter expresses concerns about emergency evacuation in the event of a wildfire. Refer to MR-18 (Emergency Evacuation) regarding project impacts to emergency response and evacuation, which were not required to be analyzed in the 2026 Recirculated Draft EIR. Appendix J1 confirms that the project's Fire and Emergency Operation Assessment (FEOA; Appendix J), which considers evacuation and emergency response, is adequate, and only a supplemental analysis analyzing the project's baseline existing conditions compared to the project with and without additional fire prevention measures is needed to comply with the Writ. This

supplemental analysis is the subject of Appendix J1. The project's existing emergency evacuation and response analysis remains accurate and unaffected by the revisions in the 2026 Recirculated Draft EIR. Please also refer to MR-9 (Wildfire) in Volume 4 Chapter 3, *Response to Comments on the Draft EIR And Recirculated Draft EIR* for additional information on emergency evacuation. As described in response I145-5 above, impacts related to wildfire risk would be less than significant, and no changes to the 2026 Recirculated Draft EIR are needed.

I145-7 The commenter asks who would be responsible for maintaining sight distance at Driveway #2. Refer to MR-25 (Driveway #2 Sight Distance).

I145-8 The commenter asks what would trigger additional pedestrian improvements in the project vicinity. Attachment D of Appendix I1 describes the additional improvements considered and why they were not incorporated into the project at this time; for example, traffic signal warrants are based on field-observed operating conditions such as vehicular volumes and peak-hour delay, which cannot be definitively measured prior to project construction. County of San Diego Department of Public Works (DPW) would continue to regularly analyze traffic incidents, reports, and violations to assess the conditions and would recommend improvements if deemed necessary. Anyone wishing to file a concern or complaint may contact the Transportation Division's front desk at 858-694-3850. Concerns or complaints related to County Maintained Roads can also be submitted through the 'Tell Us Now' mobile app available for download in either the Google Play Store or Apple App Store. Additionally, road concerns can be reported by filling out and submitting a Road Service Request Form, available at: https://www.sandiegocounty.gov/content/sdc/dpw/roads/Roads_Service_Request.html. Please also refer to MR-21 (Pedestrian and Bicyclist Safety) regarding the concerns raised by the commenter.

I145-9 The commenter suggests using existing school facilities instead of constructing the proposed project. This preference is noted, but the 2026 Recirculated Draft EIR was required to address only the issues identified in the Superior Court's June 9, 2025 Minute Order and January 20, 2026 Writ of Mandate, which as described in MR-16 (Scope of the RDEIR), does not include the project's alternatives analysis. As further described in MR-17 (Project Scope and Alternatives), the project's alternatives analysis was not required to be analyzed in the 2026 Recirculated Draft EIR, and an alternate location is not considered feasible.

I145-10 The commenter reiterates their preference for a passive park and the concerns about habitat, traffic, and evacuation above. Refer to responses I145-2 through I145-9 above. No changes to the 2026 Recirculated Draft EIR are needed.

Comment Letter I146: Jon Green, September 13, 2026

Comment Letter I146

From:	Jon Green
To:	CEQA, CountyParks
Cc:	Doran, Megan E
Subject:	[External] Alpine Park Project (SCH No. 2021030196) - 2026 RDEIR | Public Comment Submission
Date:	Sunday, September 13, 2026 6:29:02 PM
Attachments:	Comments on the 2026 Recirculated Draft Environmental Impact Report – Alpine Community Park Project_9-13-2026.pdf

RE: Alpine Park Project (SCH No. 2021030196) - 2026 RDEIR

Dear Ms. Doran,

I146-1

Thank you for the opportunity to comment on the Alpine Park Project Recirculated Draft Environmental Impact Report (RDEIR). I have reviewed the supplemental technical materials prepared in response to the Superior Court's judgment and writ of mandate, and would like to give credit to County DPR for more fully addressing the legitimate concerns of County residents in response to the environmental and safety impacts that the park concept as currently designed will have on the community of Alpine.

I am submitting the attached comment letter for the official record prior to the public review period deadline on Sept 14, 2026. Please review my attached comments and provide responses to the remaining deficiencies included in the RDEIR before submitting this analysis for any further certification. I look forward to your acknowledgment of receipt and response to the comments included in my attached letter, dated Sept 13, 2026.

I146-2

On behalf of myself, the residents of Alpine, and all San Diego County taxpayers, I strongly encourage County DPR to reconsider this park as currently designed. The impacts to traffic safety, wildfire risk, and several threatened and endangered species are simply unmitigable at this scale and at this location. **A smaller, community focused design that blends a County Park with the surrounding rural landscape of Alpine is what the residents of the community are requesting from the County at this site.** Alpine already has abundant access to natural, open space lands at Wright's Field and within the Cleveland National Forest. We have dozens of under-utilized and under-maintained sports facilities already within Alpine and Harbison Canyon. Breaking ground on high-quality native grassland and oak woodland habitat is an unnecessary biological impact and an inefficient use of taxpayer money. Please reconsider this park as currently designed. We need a sustainable, resource-conscious park for Alpine that sets the stage for the reality of the 21st century.

Help us set an example of what a new park could be by creating a southwestern sustainability model for parkland - not just another water-intensive lawn at a traffic-dependent location. **This is an OPPORTUNITY for the County to create a national spotlight on resource sustainability and water-consciousness in the face of climate change and increasing wildfire risk.** Please, take this park concept back to the drawing board and design a park for Alpine that looks forward to the coming century and future-proofs your investment, rather than just another cookie cutter park that is under-utilized and under-maintained due to rising costs and dwindling resources in the years to come. You only get one chance to build this park right. Don't miss it.

13 Sept 2026

PUBLIC COMMENT VIA EMAIL

Megan Doran
Project Manager
Department of Parks and Recreation
County of San Diego, Parks and Recreation
5500 Overland Avenue, Suite 410, San Diego, CA 92123

By email to: CountyParksCEQA@sdcounty.ca.gov

RE: Alpine Park Project (SCH No. 2021030196)

COMMENTS ON THE 2026 RECIRCULATED DRAFT ENVIRONMENTAL IMPACT REPORT for ALPINE COMMUNITY PARK PROJECT – SCH NO. 2021030196

Dear County Staff and Decision-Makers:

I146-3

These comments address the **2026 Recirculated Draft Environmental Impact Report ("2026 RDEIR") for the Alpine Community Park Project ("Project")**, including the supplemental technical materials prepared in response to the Superior Court's judgment and writ of mandate.

The 2026 RDEIR contains substantially more analysis than the prior environmental document. In particular, Appendix D2 (Biological Resources), Appendix I1 (Transportation), and Appendix J1 (Fire Protection) provide additional analysis addressing the four CEQA issues identified by the Court: western spadefoot, pallid bat, wildfire, and vehicle-traffic/public-safety impacts. That additional material is important and should be considered carefully. It does not, however, fully resolve the deficiencies identified by the Court.

The 2026 RDEIR should be evaluated against the court's specific mandate. **However, the supplemental analysis included in the 2026 RDEIR appendices reveal material conflicts in the evidence, analytical limitations, reliance on assumptions concerning future conditions, and mitigation measures whose effectiveness is asserted but not fully demonstrated.**

The County acknowledges that the Superior Court found the prior EIR deficient with respect to four major issues:

1. western spadefoot;
2. pallid bat;
3. wildfire impacts; and
4. vehicle traffic/public safety.

I146-3 cont.

The Court directed the County to provide reasoned analysis supported by substantial evidence concerning those issues. The RDEIR itself summarizes the Court's directives and identifies Appendices D2, I1, and J1 as the principal supplemental materials prepared in response. **Accordingly, the relevant question is whether the new material provides a sufficiently reasoned evidentiary basis for the County's conclusions.** The County should address these issues more thoroughly in the Final EIR before certification. Or, redesign the park concept to ameliorate these issues and the need for mitigation of the substantial impacts that will be caused by this park as currently designed. Alternative park locations should also be considered.

The following comments identify where the 2026 RDEIR analysis remains incomplete.

I. WESTERN SPADEFOOT

A. APPENDIX D2 PROVIDES ADDITIONAL JUSTIFICATION FOR THE 262-METER BUFFER, BUT THE CENTRAL EVIDENTIARY CONFLICT REMAINS

The 2026 RDEIR analysis now relies principally upon:

I146-4

- Baumberger et al. (2019), which documented burrow distances ranging from 1 to 262 meters;
- the mean burrow distance of approximately 40 meters;
- Halstead et al. (2021), including the observation of a western spadefoot approximately 602 meters from a breeding pool;
- the observation that the largest home range in the Halstead study was approximately six hectares;
- the 486-meter 95th-percentile movement distance at one study site;
- the different 187-meter 95th-percentile distance at another study site;

- the existence of Wright's Field Preserve;
- the larger undeveloped distances to development west and north of the occupied pool; and
- the USFWS Biological Opinion, which determined that a 262-meter buffer was sufficient in connection with the federal consultation.

Nevertheless, the supplemental analysis still warrants further explanation.

B. THE COUNTY CONFLATES "HOME RANGE" WITH THE FULL ECOLOGICAL AREA POTENTIALLY USED BY THIS SPECIES

Appendix D2 reasons that the approximately 602-meter observation does not invalidate the 262-meter buffer because the largest observed home range in the Halstead study was approximately six hectares, corresponding to a radius of approximately 138 meters. That reasoning does not fully resolve the issue. **A home-range estimate and an individual's maximum movement distance are not necessarily interchangeable ecological measures.**

I146-4 cont.

The County itself acknowledges that western spadefoots may travel considerably farther than their core or typical home range. The 602-meter observation is therefore relevant precisely because the question is whether the Project's development boundary could interfere with movement through terrestrial habitat even when that habitat is not within the species' core home range.

The Final EIR should explain why protection of the estimated home range is sufficient to protect:

- seasonal movement;
- dispersal;
- migration to breeding pools;
- movement among aestivation sites;
- population connectivity; and
- occasional but biologically important long-distance movements.

The County should also explain why the 486-meter 95th-percentile movement distance is not the more appropriate metric for evaluating the potential geographic extent of Project-related effects.

C. THE USGS 300–400 METER RECOMMENDATION REQUIRES A MORE COMPLETE SITE-SPECIFIC RESPONSE

The County now explains that the 300–400 meter recommendation was developed in connection with the City of Santee Subarea Plan and that site-specific habitat conditions justified a larger buffer there. It does not, however, eliminate the need to explain why the underlying biological rationale for that recommendation does not apply to Alpine.

Appendix D2 itself describes the USGS recommendation as relating to protection of an undeveloped terrestrial buffer around breeding ponds and notes its consistency with conservation recommendations in the federal recovery plan.

I146-4 cont.

The Final EIR should therefore answer a narrower question:

> **What site-specific evidence demonstrates that the ecological functions protected by a 300–400 meter undeveloped buffer are unnecessary at the Alpine site?**

The existence of Wright's Field Preserve is important evidence, but it does not automatically establish that all terrestrial habitat on the Project side of the breeding pools is unnecessary.

The County should identify the specific evidence showing:

1. where western spadefoots presently occur;
2. where they aestivate;
3. how they move between breeding and terrestrial habitat;
4. how the Project's construction boundary intersects those movement areas;
5. how Wright's Field compensates for habitat lost on the Project site; and
6. why the resulting configuration remains ecologically functional.

D. THE DOCUMENTED AP-7 BREEDING EVENT SHOULD NOT BE DISMISSED AS BIOLOGICALLY INSIGNIFICANT

I146-5

The record documents a western spadefoot egg mass in AP-7 during the exceptionally wet winter of 2018–2019. The County explains that no larvae were observed and characterizes the event as an opportunistic breeding attempt because AP-7 remained inundated for only approximately seven weeks. **That evidence is relevant, but it does not establish that AP-7 has no biological significance.**

For amphibians dependent upon ephemeral breeding conditions, unusually wet years may be precisely when otherwise marginal breeding habitat becomes available. The Final EIR should therefore evaluate the environmental significance of eliminating a documented breeding opportunity during wet years rather than treating the observation primarily as evidence that the basin is unsuitable.

The analysis should address:

I146-5 cont.

- the frequency of conditions under which AP-7 becomes inundated;
- whether those conditions are expected to recur;
- whether future climate variability could alter the frequency or duration of inundation;
- whether the basin provides breeding opportunities even if it does not consistently produce successful recruitment; and
- whether its elimination reduces the number or spatial distribution of available breeding sites.

E. REPLACEMENT SPADEFOOT BASINS REQUIRE MINIMUM PERFORMANCE STANDARDS RELATED TO HABITAT FUNCTIONALITY

The federal conservation measures described in Appendix D2 require creation of three permanent basins totaling at least 471 square feet, within dispersal distance of existing Wright's Field breeding sites and located as far from access roads as practicable. Those measures are potentially beneficial. **However, replacing surface area does not necessarily establish replacement of ecological function.**

The Final EIR should identify measurable performance standards for the replacement habitat addressing:

I146-6

- hydrologic function;
- inundation duration;
- breeding use;
- larval development;
- accessibility from occupied habitat;
- upland connectivity;
- road mortality;
- long-term maintenance; and
- consequences if the basins do not function as intended.

This is particularly important because the Project will eliminate an existing basin in which breeding was actually documented. The County should establish a defined

I146-6 cont. period for evaluating whether the replacement basins are functioning and identify mandatory corrective measures if they fail.

F. THE USFWS BIOLOGICAL OPINION SHOULD BE EXPLAINED, NOT TREATED AS DISPOSITIVE OF THE CEQA ISSUE

Appendix D2 states that the County coordinated with USFWS and that USFWS determined that a 262-meter buffer was sufficient in its Biological Opinion. It further states that federal conservation measures will be implemented and that federal permit requirements supersede conflicting mitigation measures.

I146-7 **The Final EIR should identify exactly what assumptions and conservation measures support the federal determination and how those measures have been incorporated into the County's Project approval.**

The County should explain:

- which conservation measures are mandatory;
- which are incorporated into the Project;
- which are enforceable by the County;
- which are enforceable only through the federal permit;
- whether all federal conditions remain applicable to the Project as now proposed; and
- how the federal analysis addresses the specific movement-distance evidence identified in the Court's writ.

II. PALLID BAT

A. THE COUNTY SHOULD EXPLAIN WHY 200 FEET IS AN ADEQUATE INITIAL SURVEY AREA FOR A SPECIES THAT MAY BE DIFFICULT TO DETECT

I146-8 Appendix D2 acknowledges that pallid-bat roosts can be difficult to detect, including roosts in rock crevices. At the same time, the County relies upon a 200-foot survey buffer and then relies upon a qualified biologist to establish a larger buffer if a maternal roost is identified.

What protects an undetected roost located outside the 200-foot survey area?

I146-8 cont.

The County's supporting evidence includes studies involving other bat species, including buffers substantially smaller than 500 feet. Appendix D2 also discusses a 150-foot USFWS recommendation for northern long-eared bats and a 100-foot study involving another North American bat species. Those studies provide relevant comparative information, but the County acknowledges that they are not biological analogues for pallid bat.

The Final EIR should therefore explain why those interspecies comparisons provide substantial evidence supporting the initial 200-foot survey distance for pallid bat specifically.

B. THE COUNTY SHOULD DISTINGUISH BETWEEN "SURVEY BUFFER," "MINIMUM AVOIDANCE BUFFER," AND "ULTIMATE BUFFER"

The revised mitigation framework uses these concepts in ways that could be confusing to implementation personnel and the public.

I146-9

The Final EIR should clearly state:

1. how far from the construction footprint surveys must extend;
2. what happens if a roost is found within that area;
3. what minimum buffer automatically applies;
4. when the biologist must establish a larger buffer;
5. what factors determine the larger buffer; and
6. whether construction is prohibited while the buffer determination is pending.

The County's current language is potentially adequate if implemented correctly, but the Final EIR should eliminate ambiguity before certification.

C. BAT BOXES ARE A SUPPLEMENTAL MEASURE, NOT DEMONSTRATED EQUIVALENT REPLACEMENT OF NATURAL ROOSTS

The revised MM-BIO-7 is substantially more detailed than the earlier measure.

I146-10

It requires:

- bat boxes before vegetation removal;
- consultation with a bat expert;
- designs accommodating solitary and maternal roosts;
- consideration of thermal conditions;

- quarterly monitoring for two years;
- twice-yearly monitoring through years three through five; and
- consideration of repositioning or redesign if boxes remain unoccupied after two years.

I146-10 cont.

These are meaningful improvements. **However, the remaining issue is whether installation and monitoring demonstrate functional replacement of any natural roost that may be affected.**

The Final EIR should establish what constitutes successful performance and what mandatory action will occur if the boxes remain unoccupied after redesign or repositioning.

III. WILDFIRE

A. APPENDIX J1 ACKNOWLEDGES THAT THE PROJECT WILL INCREASE HUMAN-CAUSED IGNITION OPPORTUNITIES

The fire analysis estimates approximately:

- 300–500 visitors per day at full buildout;
- up to approximately 1,000 visitors per day on weekends; and
- up to approximately 2,000 visitors per day during special events.

Appendix J1 expressly recognizes that increased human presence can create additional opportunities for human-caused ignitions.

I146-11

The County then relies upon:

- smoking prohibitions;
- open-flame restrictions;
- barbecue restrictions during Red Flag warnings;
- signage;
- ranger visits;
- live-on staff;
- maintenance staff;
- strengthened vehicle barriers;
- fire-safe parking; and

- prohibition of overnight use.

I146-11 cont.

Those measures are reasonable risk-reduction measures. **However, the analysis does not establish how much each measure reduces the increased ignition opportunity associated with the Project.**

The Final EIR should therefore avoid implying that the research demonstrates a quantified reduction when the research instead supports the more general proposition that education and enforcement are effective means of reducing prohibited behavior.

B. THE COUNTY'S OWN FIRE ANALYSIS RECOGNIZES LIMITATIONS IN ENFORCEMENT

I146-12

This point is particularly important because Appendix J1 relies on hypothetical enforcement recommendations, not actual operational standards. The analysis acknowledges that weekly ranger visits would not prevent occasional unauthorized use and that some ignition potential would remain under the hypothetical code-only condition. The County then concludes that additional staffing and operational measures make the Project less than significant.

The Final EIR should explain precisely what level of on-site staffing is actually committed as part of the Project and whether that staffing is an enforceable Project condition. If the conclusion depends upon a live-on volunteer, maintenance staff, or ranger presence, those personnel requirements should be incorporated into an enforceable condition rather than treated solely as an operational expectation.

C. FIRE-BEHAVIOR REDUCTION AND IGNITION-RISK REDUCTION SHOULD NOT BE PRESENTED AS THE SAME THING

I146-13

Appendix J1 provides substantial modeled reductions in:

- flame length;
- fire intensity;
- rate of spread; and
- ember spotting distance.

For example, the additional 20-foot fuel-modification areas are modeled to reduce flame length from approximately 18 feet to approximately 3 feet and reduce ember spotting from approximately 1.1 miles to approximately 0.3 miles in the analyzed scenario.

Those results are useful, but they answer a different question from:

How likely is a Project visitor or operation to initiate a fire?

I146-13 cont.

The Final EIR should maintain that distinction throughout its significance analysis.

A Project can simultaneously:

- reduce fire intensity if a fire occurs; and
- increase the number of opportunities for human-caused ignition.

The conclusion should address both components explicitly.

D. WILDFIRE EVACUATION SHOULD BE EVALUATED IN CONJUNCTION WITH THE TRAFFIC ANALYSIS

The Project's wildfire analysis concludes that the Project would not substantially impair an emergency response or evacuation plan. That conclusion should be considered together with the South Grade Road analysis.

The Project may have:

- hundreds of ordinary daily visitors;
- approximately 1,000 weekend visitors; and
- up to approximately 2,000 visitors during special events.

I146-14

The Final EIR should explain how evacuation operates under a high-occupancy condition when:

- South Grade Road is congested;
- emergency vehicles are entering the area;
- visibility is reduced by smoke;
- visitors are attempting to leave simultaneously; and
- normal roadway operations are disrupted by an active wildfire.

The County should demonstrate that the conclusion holds true under the Project's identified maximum-use conditions.

IV. SOUTH GRADE ROAD / TRAFFIC SAFETY

A. DRIVEWAY #2'S SIGHT-DISTANCE CONDITION SHOULD BE INCORPORATED INTO THE PROJECT'S ENFORCEABLE DESIGN

The County acknowledges that vegetation and rock/boulder outcroppings affect sight distance at Driveway #2. The County characterizes these conditions as pre-existing and proposes vegetation clearing and removal or grading of rock/boulder outcroppings through the standard site-plan and improvement-plan approval process.

The environmental document should identify the **required physical improvements now**, rather than simply requiring future compliance with standards.

I146-15

The Final EIR should incorporate a clear condition requiring that:

- the applicable sight-distance envelope be established;
- all obstructions within that envelope be removed or controlled;
- the necessary grading/rock removal be completed before Project operation; and
- the required sight distance be maintained for the life of the Project.

This would also allow the environmental consequences of the necessary vegetation and rock removal to be understood now and analyzed concurrently as a direct project-related impact.

B. THE NIGHTTIME / DAWN / DUSK LIMITATION SHOULD BE RESOLVED

Appendix I1 expressly states that the sight-distance field analysis was performed under normal daytime conditions and that **dawn, dusk, and nighttime operations were not evaluated**. It recommends that the park programming and operations plan consider whether restricted hours, signage, or lighting are warranted. This is a major analytical flaw that needs to be addressed.

I146-16

The Final EIR should establish the Project's intended operating hours and then determine whether low-light conditions are reasonably foreseeable.

If the Project will operate during dawn, dusk, or nighttime periods, the County should evaluate:

- visibility of pedestrians;
- visibility of bicyclists;

I146-16 cont.

- vehicle headlights;
- roadway lighting;
- glare;
- intersection illumination;
- effective sight distance; and
- emergency conditions.

If the Project will not operate during those periods, that restriction should be clearly incorporated into the Project's operating conditions. **A future operations plan should not be the only document establishing a limitation that is necessary to support the safety conclusion.**

C. THE TRAFFIC-CONTROL LANGUAGE SHOULD BE CLARIFIED

I146-17

The 2026 materials distinguish between the proposed **side-street stop control at Driveways #1 and #2** and an **all-way stop at South Grade Road/Calle de Compadres**. Appendix I1 explains that the project driveways are proposed to operate under side-street stop control because the driveway volumes are relatively low compared with South Grade Road and because an unwarranted all-way stop could introduce other operational concerns. It separately discusses the County's decision to implement an all-way stop at Calle de Compadres as an additional safety feature.

The Final EIR should state this configuration clearly and consistently. Any redline or superseded language suggesting that a different traffic-control configuration is proposed should be removed or clearly identified as superseded.

D. THE CRASH ANALYSIS SHOULD ADDRESS EXPOSURE, NOT ONLY FAULT

I146-18

Appendix I1 reviews the five-year crash history and separately considers two older fatal incidents. The County concludes that the prior pedestrian fatality was attributed to pedestrian conduct rather than geometric deficiencies or absence of all-way stop control. **However, collision causation and future exposure are different questions.**

The Final EIR should explain whether the Project will materially increase the number of pedestrians and bicyclists exposed to South Grade Road and the relevant intersections.

The analysis should therefore consider:

- pedestrian volumes generated by the Project;
- bicycle volumes;
- crossing locations;

I146-18 cont.

- walking routes between parking and park facilities;
- interaction with South Grade Road traffic;
- nighttime or low-light use if permitted; and
- emergency evacuation conditions.

E. THE 250-VEHICLE CONDITION DEMONSTRATES WHY OPERATIONAL CONTROLS ARE NECESSARY

The County's own analysis identifies a potential combined demand of approximately 250 vehicles against a 240-space parking supply. The County responds with a scheduling protocol prohibiting overlapping organized sports activities and requiring monitoring for spillover. If spillover occurs more than twice in a season, the protocol requires a one-hour buffer between sessions, increasing to two hours if spillover continues. This is a useful mitigation mechanism.

I146-19

However, it is **reactive rather than preventive in its first instance**. The first two spillover events can occur before the one-hour buffer becomes mandatory.

The Final EIR should therefore clarify:

- what happens during the first and second spillover events;
- who has authority to stop or modify the scheduled activity;
- whether an activity can proceed when parking is already full;
- how unauthorized or unscheduled events are controlled;
- how special events are handled; and
- whether the protocol applies to non-sports park use.

F. THE PARKING ANALOG STUDY SHOULD BE CHARACTERIZED WITH APPROPRIATE CAUTION

The County screened 76 parks and selected Hilton Head County Park based on multiple comparability factors. However, the detailed activity sample remains limited for some categories. The table reports five baseball observations and two multi-use-field practice observations.

I146-20

The Final EIR should therefore avoid presenting the analog study as a statistically definitive prediction of maximum demand.

Instead, it should explain the uncertainty associated with transferring observations from another park to a new facility with a different:

- geographic setting;

I146-20 cont.

- transportation environment;
- population;
- amenity mix;
- equestrian component; and
- special-event potential.

This is particularly important because the Project is intended to serve a rural community where travel behavior may differ from the selected urban/suburban analog.

V. REQUESTED REVISIONS

A. ALL MITIGATION MEASURES SHOULD BE SPECIFIC AND ENFORCEABLE

The supplemental materials demonstrate that the County has made significant efforts to convert several mitigation concepts into operational requirements. However, the Final EIR should nevertheless ensure that every measure upon which a less-than-significant conclusion depends identifies:

I146-21

1. the responsible entity;
2. the timing of implementation;
3. the performance standard;
4. the monitoring mechanism;
5. the consequence of noncompliance; and
6. the corrective action required.

This is particularly important for:

- western spadefoot replacement habitat;
- pallid-bat roost avoidance;
- bat boxes;
- wildfire staffing/enforcement;
- parking scheduling; and
- roadway sight-distance maintenance.

B. THE FINAL EIR SHOULD DISTINGUISH BETWEEN PROJECT DESIGN FEATURES, MITIGATION, AND FUTURE DISCRETION

The supplemental materials sometimes characterize measures as Project design features while elsewhere relying upon them as part of the evidentiary basis for the less-than-significant conclusion.

The Final EIR should clearly identify which measures are:

I146-22

- part of the Project;
- mitigation measures;
- federal permit conditions;
- County regulatory requirements;
- future discretionary decisions; or
- operational practices.

This distinction matters because the environmental analysis should be based on measures that are actually committed and enforceable. Any future discretionary decisions or operational practices that are variable and subject to staff or policy changes should not be included as evidentiary to successful mitigation practices.

C. NEEDED CHANGES

Before certification, the County should revise the Final EIR to include changes to the following sections:

Western spadefoot

I146-23

1. Explain why the 262-meter buffer is sufficient despite the 486-meter 95th-percentile movement distance and approximately 602-meter documented movement.
2. Provide a more complete site-specific explanation for rejecting the 300–400 meter USGS recommendation.
3. Analyze the ecological significance of the documented AP-7 breeding event.
4. Demonstrate the functional equivalency of replacement breeding basins.
5. Establish measurable performance standards and contingency measures for replacement habitat.
6. Clearly explain the role and enforceability of the USFWS Biological Opinion and associated conservation measures.

I146-23 cont.

Pallid bat

7. Explain why a 200-foot initial survey area is sufficient despite acknowledged difficulty in detecting roosts.
8. Explain the evidentiary basis for applying studies of other bat species to pallid bat.
9. Clearly distinguish the survey buffer, minimum avoidance buffer, and biologist-determined final buffer.
10. Establish objective performance criteria for artificial bat roosts and mandatory corrective measures if those criteria are not achieved.

Wildfire

11. Maintain a clear distinction between reduced fire behavior after ignition and reduced probability of ignition.
12. Identify the evidence supporting the claimed effectiveness of human-activity controls.
13. Incorporate staffing and enforcement commitments into enforceable Project conditions where those commitments are necessary to support the significance conclusion.
14. Analyze high-occupancy wildfire evacuation conditions in conjunction with the South Grade Road analysis.
15. Clearly disclose the limitations and uncertainty of the fire-behavior modeling.

Traffic and public safety

16. Incorporate the necessary Driveway #2 sight-distance improvements into enforceable Project conditions.
17. Establish the required sight-distance maintenance obligation for the life of the Project.
18. Establish Project operating hours and address dawn/dusk/nighttime conditions if such use is permitted.
19. Clarify the final traffic-control configuration at the Project driveways and Calle de Compadres.
20. Analyze pedestrian and bicycle exposure independently from vehicular traffic operations.
21. Clarify how parking controls apply to special events, non-sports users, and unscheduled activities.
22. Establish enforceable consequences for parking spillover before the reactive one-hour/two-hour scheduling thresholds are triggered.

VI. CONCLUSION

The 2026 RDEIR represents a substantial expansion of the environmental record and directly responds to the four subjects identified by the Superior Court. Credit is due to the County for responding to the overwhelming public comments requesting more thorough environmental and community impacts from the Project as currently designed.

Nevertheless, the supplemental materials do not eliminate all substantive questions as required by law for an adequate environmental impact analysis of the Project.

For western spadefoot, the County has now provided a reasoned defense of the 262-meter buffer, but the Final EIR should more fully reconcile that selection with the 486-meter 95th-percentile movement distance, the approximately 602-meter documented movement, the USGS 300–400 meter recommendation, and the ecological significance of AP-7.

For pallid bat, the County has substantially improved MM-BIO-8 by allowing a qualified biologist to establish a larger buffer, including 500 feet where warranted. The remaining question is whether the evidence adequately supports the 200-foot initial survey framework given the acknowledged difficulty of detecting roosts, and the lack of species-specific evidence in supporting this limited survey area.

I146-24

For wildfire, Appendix J1 now expressly considers human-caused ignition risk. The remaining issue is whether the qualitative research and operational controls provide sufficient evidence to establish the magnitude of the claimed reduction in ignition risk and whether the Project's increased human presence and maximum occupancy have been adequately considered.

For traffic safety, Appendix I1 provides a substantially more detailed sight-distance and crash analysis. However, Driveway #2 still requires physical correction, the analysis expressly excludes dawn/dusk/nighttime conditions, and several safety conclusions depend upon future plan review or operational controls that should be clearly incorporated into the Project and enforceable conditions.

Finally, the parking analysis demonstrates that the 240-space supply is adequate under the County's analyzed single-event conditions but that combined demand could approach approximately 250 vehicles. The proposed scheduling controls are therefore important and should be made sufficiently specific and enforceable to ensure that the Project does not create foreseeable parking spillover and associated pedestrian exposure along South Grade Road. Capacity use of the Project estimated at 2,000 people per day and assuming 250 vehicles equals 8 people per vehicle. Estimates need further scrutiny to ensure accuracy and safety of both vehicles and pedestrians.

I146-24 cont.

For these reasons, **the County should NOT rely solely upon the conclusions presently stated in the 2026 RDEIR**.

The Final EIR should expressly address the evidentiary conflicts and analytical limitations identified above, incorporate the necessary physical and operational controls into enforceable Project conditions, and explain why the resulting residual impacts are less than significant. Mitigation measures should have rigorous and well-defined performance standards. Assumptions of anticipated Project use and potential impacts to the surrounding residents and ecological conditions should be spelled out for clarity.

The County should provide a complete response to these comments in the Final EIR and should not certify the environmental document until the administrative record contains substantial evidence supporting each challenged conclusion.

Redesigning the Project to a smaller, less impactful scale, and/or seeking out alternative locations is preferred due to the unmitigable impacts of the Project at this location.

Respectfully submitted,

Jon Green

15-year Alpine Resident

Comment Letter I146 Response: Comments I146-1 through I146-24

I146-1 This comment introduces the commenter's letter and the concerns detailed in subsequent comments. Refer to responses I146-2 through I145-24 below.

I146-2 This comment asserts that impacts to traffic safety, wildfire risk, and sensitive species are unmitigable and requests a smaller park design. As described in Sections 4.17 and 4.20, impacts to traffic safety and wildfire risk would be less than significant without mitigation; also refer to MR- 21 (Pedestrian and Bicyclist Safety) and MR-19 (Wildfire Ignition and Spread) regarding these issues. As described in Section 4.4, impacts to biological resources would be less than significant with mitigation; refer to MR-26 (Western Spadefoot Buffer) and MR-27 (Pallid Bat MM-BIO-8) regarding the sensitive species that were the subject of the Writ. No changes to the 2026 Recirculated Draft EIR are needed. Regarding a smaller park size, refer to MR-17 (Project Scope and Alternatives) for a discussion of the park's design.

I146-3 This comment acknowledges the specific revisions made in response to the Superior Court's June 9, 2025 Minute Order and January 20, 2026 Writ of Mandate but asserts the revisions do not adequately address the environmental topics analyzed in the 2026 Recirculated Draft EIR. Refer to responses I146-4 through I145-23 below regarding specific comments on the analysis in the 2026 Recirculated Draft EIR.

I146-4 The commenter asks why a 300-400 meter undeveloped buffer around western spadefoot breeding ponds is unnecessary for the project site and asserts that the EIR should explain why protection of the estimated home range, not the maximum movement distance, is sufficient to protect western spadefoot seasonal movement, dispersal, migration to breeding pools, movement among aestivation sites, population connectivity, and occasional but biologically important long-distance movements. The commenter is correct that a home-range estimate and maximum movement distance are separate ecological measures. Refer to MR-26 (Western Spadefoot Buffer) regarding the adequacy of a home range analysis; the project site's adjacency to suitable habitat and Wright's Field Preserve ensures that a safe route of travel exists between breeding pools and suitable upland habitat with a 262-meter buffer. No changes to the 2026 Recirculated Draft EIR are needed.

I146-5 The commenter asserts that the FEIR should not conclude that breeding pool AP-7 is biologically insignificant. Refer to MR-24 (Breeding Pool AP-7); breeding pool AP-7 is treated as a biologically significant resource requiring mitigation, and no changes to the 2026 Recirculated Draft EIR are needed.

I146-6 The commenter asserts that the County should establish a defined period for evaluating the success of western spadefoot replacement basins and identify mandatory corrective measures if they fail. The project proposes mitigation through establishment and long-term management of the 67.5-acre Preserve (APM-BIO-1), restoration and enhancement of western spadefoot breeding habitat within the Preserve (MM-BIO-4), and restoration of native grassland habitat within the Preserve and Wright's Field (MM-BIO-10). The project's western spadefoot habitat mitigation and monitoring plan would include specific success criteria for the project. If results do not meet success criteria, adaptive

management would be implemented. The USFWS and CDFW would be in receipt of annual reports detailing the status of the mitigation. If success criteria are not met, these agencies would hold the County responsible for ensuring adequate mitigation is provided for project impacts to western spadefoot. The project would include mandatory corrective measures, and no changes to the 2026 Recirculated Draft EIR are needed.

I146-7 The commenter asserts that the FEIR should identify what assumptions and measures support the USFWS' determination that a 262-meter buffer for western spadefoot breeding pools is sufficient. Refer to MR-26 (Western Spadefoot Buffer) regarding the USFWS' Biological Opinion. The USFWS Biological Opinion is also provided as Attachment A of Appendix D2. The USFWS Biological Opinion is dated August 11, 2025 and remains applicable to the project as described in the 2026 Recirculated Draft EIR. All conservation measures listed in the USFWS Biological Opinion support the federal determination and are mandatory conditions of the federal permit. These measures would be implemented by the County and enforced by the USFWS. As such, these mandatory measures have all been incorporated into the project and remain applicable to the project as proposed. The federal permit and analysis, available at the following link, are separate from the Court's Writ, which is related to CEQA: https://www.regulations.gov/docket/FWS-R8-ES-2024-0133/document. No changes to the 2026 Recirculated Draft EIR are needed.

The USFWS Biological Opinion focused on total habitat conserved rather than specific movement-distance evidence. The USFWS employs species experts who are specifically directed to protect imperiled species. To determine sufficient protection of a species, the USFWS considers the status of the species in question, the baseline condition of the project area, the effects of the project, and cumulative effects. While the USFWS did not cite the research used to support the 262-meter buffer, they did reach the following conclusion: "Although project construction will eliminate 23.1 acres of habitat that spadefoot could use for foraging and aestivation, we do not anticipate that these habitat functions will limit the spadefoot population size given the remaining habitat within the Preserve and Wright's Field. Protection and management of spadefoot habitat within the Preserve combined with restoration of breeding habitat will fully offset impacts from construction of the recreational park such that the population trajectory will be equal or better over time compared to a no project alternative." Additionally, the USFWS states, "No reasonable and prudent measures beyond those included in the proposed HCP have been identified to minimize and mitigate the effects of incidental take." Therefore, the buffer provided to the USFWS by the County was deemed sufficient to protect western spadefoot. USFWS also stated, "We expect that the creation of spadefoot breeding habitat will result in a population increase and increase the likelihood that the population remains self-sustaining." The federal determination was based on the incorporation of the mandatory conditions mentioned above and the USFWS' expert opinion that the project would not adversely affect western spadefoot. No changes to the 2026 Recirculated Draft EIR are needed.

I146-8 The commenter asks what protects an undetected roost located outside the 200-foot survey area and asserts that the FEIR should explain why interspecies comparisons support the project's 200-foot survey distance for pallid bat, as described in mitigation

measure MM-BIO-8. Refer to MR-27 (Pallid Bat MM-BIO-8) for an explanation of the survey buffer in MM-BIO-8, which has been expanded to 400 feet beyond the project construction footprint to ensure that roosts requiring larger construction avoidance buffers for stationary sources and lighting without shields are adequately identified and protected.

I146-9 The commenter asserts that the buffer language of MM-BIO-8 is confusing and could be implemented incorrectly. The County respectfully disagrees; MM-BIO-8 clearly states which buffer is being described in each instance. For example, regarding pre-construction surveys, MM-BIO-8 states that "These surveys will be conducted throughout the entirety of the project construction footprint as well as a 400-foot buffer around the project construction footprint," making it clear that the buffer being discussed is the survey buffer. Regardless, additional clarification has been added to MM-BIO-8 and Appendix D2 to more clearly distinguish between the survey buffer and the avoidance buffers. Refer to MR-27 (Pallid Bat MM-BIO-8) for additional clarification on the pallid bat survey and construction avoidance buffers.

I146-10 The commenter asserts that the Final EIR should establish what constitutes successful performance of the bat boxes and what mandatory action will occur if the boxes remain unoccupied after redesign or repositioning. Refer to MR-16 (Scope of the RDEIR); the bat boxes were not required to be analyzed in the 2026 Recirculated Draft EIR and were not changed from the 2023 FEIR. However, the below information is provided for reference. MM-BIO-8 includes performance measures to ensure functional replacement of any natural roost that may be affected. For instance, MM-BIO-8 includes a requirement to conduct bat surveys, including maternal bat roost surveys, at years 1, 3, and 5 after construction completion within the areas originally surveyed prior to construction. If maternal 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 open space if the affected maternal roost site utilized Engelmann oak trees or by building artificial bat roosts specifically for the affected bat species. The mitigation measure is clear as written and no changes to the 2026 Recirculated Draft EIR are needed.

I146-11 The commenter asserts that the Final EIR should not imply that research demonstrates a quantified reduction in ignition risk on the project site. However, page 4.20-26 in Section 4.20 of Volume 2 explicitly states that ignition risk cannot be quantitatively modeled, and thus a qualitative research-backed analysis is necessary: "Because human activity related risks cannot be predicted and quantified by the modeling software, additional research was undertaken in Appendix J1 to qualitatively assess effective means of reducing human related ignition risk compared to existing conditions." As described in MR-19 (Wildfire Ignition and Spread), research has demonstrated that the ignition-reduction measures implemented by the project are effective, and no changes to the 2026 Recirculated Draft EIR are needed.

I146-12 The commenter asserts that the Final EIR should explain what level of on-site staffing is proposed for the project and incorporate that level of staffing as a project condition. Refer to MR-19 (Wildfire Ignition and Spread), which describes the project's on-site staffing. The on-site staffing is incorporated into the project design and operational framework. As the project owner and operator, County Parks would be responsible for implementing, maintaining, and monitoring the on-site staffing as part of ongoing park operations. No changes to the 2026 Recirculated Draft EIR are needed.

I146-13 The commenter asserts that the Final EIR should clearly distinguish between fire behavior reduction and ignition risk reduction. However, Section 4.20 of Volume 2 clearly makes this distinction as written. For example, Section 4.20.6 explains the difference between vegetation fuel modification fire prevention measures, which can be quantitatively modeled, and human activity fire prevention measures, which cannot be qualitatively modeled. The analysis under Threshold 2 in Section 4.20.6.3 separates the discussions of fire behavior and ignition, as requested by the commenter. The 2026 Recirculated Draft EIR is adequate as written and no changes to the 2026 Recirculated Draft EIR are needed.

I146-14 The commenter asserts that wildfire evacuation should be analyzed in conjunction with the project's traffic analysis. Refer to MR-18 (Emergency Evacuation) regarding project impacts to emergency response and evacuation, which were not required to be analyzed in the 2026 Recirculated Draft EIR. Project traffic volumes have not changed, and the traffic analysis in Section 4.17.4.3 and emergency evacuation analysis in Section 4.9.4.3 and Section 4.20.6.3 in Volume 2 remain valid. Please also refer to MR-9 (Wildfire) in Volume 4 Chapter 3, *Response to Comments on the Draft EIR And Recirculated Draft EIR* for additional information on emergency evacuation. No changes to the 2026 Recirculated Draft EIR are needed.

I146-15 The commenter asserts that the Final EIR should identify the specific sight-distance requirements for Driveway #2 as a project condition. Refer to MR-25 (Driveway #2 Sight Distance) regarding implementation of Driveway #2 sight distance requirements. The sight distance requirements would be implemented by the County's standard site plan review and improvement plan approval process pursuant to the County of San Diego Site Design Standards and Roadway Design Standards, which require that sight distance requirements be satisfied and shown on project plans prior to approval by County DPW. This requirement is built into the project's implementation process and does not need to be incorporated as a condition. No changes to the 2026 Recirculated Draft EIR are needed.

I146-16 The commenter asserts that the Final EIR should assess low-light visibility and incorporate a restriction on operational hours if the park is not proposed to be operational during dawn, dusk, or nighttime periods. The park would operate from sunrise to sunset and would be secured each evening in accordance with County of San Diego Department of Parks and Recreation (DPR) operating procedures, including closure of park access points at sunset. As the park would not be open during low-light conditions, these conditions are not analyzed in Appendix I1. Regardless, the project would include safety lighting near the entrance to the park, which would illuminate any

pedestrians or bicyclists in or adjacent to the roadway at the project entrances. No changes to the 2026 Recirculated Draft EIR are needed.

I146-17 The commenter states that the Final EIR should distinguish between side-stop and all-way stop controls at project driveways. To clarify, the project has been revised to include a two-way stop control at the intersection of South Grade Road and Calle de Compadres, and no longer proposes an all-way stop. This change has been noted throughout the Final EIR in double strikeout/underline.

I146-18 The commenter states that the project's crash analysis should consider exposure, not only fault, and assess if the project would increase the number of pedestrians and bicyclists exposed to South Grade Road. Refer to MR-21 (Pedestrian and Bicyclist Safety); safety impacts to pedestrians and bicyclists would be less than significant. Regarding crossing locations and walking routes, Attachment D of Appendix I1 describes the additional improvements considered and why they were not incorporated into the project at this time; for example, the appropriateness of a high-visibility crosswalk are based on field-observed operating conditions such as pedestrian crossing demand and driver yielding compliance, which cannot be definitively measured prior to project construction. County of San Diego Department of Public Works (DPW) would continue to regularly analyze traffic incidents, reports, and violations to assess the conditions and would recommend improvements if deemed necessary. Anyone wishing to file a concern or complaint may contact the Transportation Division's front desk at 858-694-3850. Concerns or complaints related to County Maintained Roads can also be submitted through the 'Tell Us Now' mobile app available for download in either the Google Play Store or Apple App Store. Additionally, road concerns can be reported by filling out and submitting a Road Service Request Form, available at: https://www.sandiegocounty.gov/content/sdc/dpw/roads/Roads_Service_Request.html. Low-light conditions are addressed in response I146-16 above. No changes to the 2026 Recirculated Draft EIR are needed.

I146-19 The commenter asserts that the Final EIR should clarify the protocol for monitoring and addressing vehicle spillover from the project's parking lot onto South Grade Road. Refer to MR-28 (Sports Programming Protocol) for more information. No changes to the 2026 Recirculated Draft EIR are needed.

I146-20 The commenter asserts that the Final EIR should not present the parking analog study as a statistically definitive prediction of maximum demand. Refer to MR-22 (Analog Park Selection); Hilton Head County Park is suitable comparison. No changes to the 2026 Recirculated Draft EIR are needed.

I146-21 The commenter requests that all mitigation measures be specific and enforceable. As described in the responses above, particularly responses I146-5 and I146-9, the project includes detailed and enforceable mitigation measures, consistent with the request in this comment. No changes to the 2026 Recirculated Draft EIR are needed.

I146-22 The commenter asserts that the Final EIR should distinguish between project design features, mitigation, and future discretion. The project design features (such as the sports programming and fire prevention measures) are incorporated into the project

design and operational framework, as described in Section 4.17.4.3 and Section 4.20.6.1. As the project owner and operator, County Parks would be responsible for implementing, maintaining, and monitoring the project design features as part of ongoing park operations via the park's operations manual. Where necessary, mitigation measures are clearly identified in the Final EIR with the "MM-" prefix and would be enforceable and specific. Future discretionary actions are clearly identified in the project's mitigation measures; for example, MM-BIO-8 explains that the Bat Roost Management, Monitoring, and Mitigation Plan is subject to review by CDFW. Discretionary actions are also listed in Table 1-1, *List of Required Discretionary Actions and Permits* in Volume 2. No changes to the 2026 Recirculated Draft EIR are needed.

I146-23 The commenter reiterates the requests made in the comments above. Refer to responses I146-2 through I146-21 above. No changes to the 2026 Recirculated Draft EIR are needed.

I146-24 The commenter reiterates the requests made in the comments above. Refer to responses I146-2 through I146-21 above. No changes to the 2026 Recirculated Draft EIR are needed.

Comment Letter I147: Kim Hales, September 14, 2026

Comment Letter I147

From: dudziktaz
To: CEQA_CountyParks
Subject: [External] Attn Megan Doran: Alpine County Park Project - SCH#2021030196.
Date: Monday, September 14, 2026 5:00:08 PM

Dear Megan Doran,

I147-1 I am writing to urge County Parks to please consider native and California friendly plantings that will go into the Alpine County Park Project.
Any other plantings, such as grass and florals are very water intensive, may be invasive and might deter native wildlife, thereby disrupting the natural ecosystem.
This park in going into an area that already has native chaparral, and the loss of that will already be disruptive, if not devastating to the local flora and fauna.
Native plants can be beautiful, and they will attract fun and interesting pollinators, thereby only adding to the park's appeal. Further, native plantings are already adapted to the dry, hot conditions we commonly experience here in Alpine and will survive the infrequent cold snaps that might occur. I urge you to visit the San Diego Chapter of the California Native Plant Society at https://cnpssd.org/, as well as California Invasive plant Council at https://www.cal-ipc.org/ for information on good plants and what plants to avoid. There are many alternatives to grass.
I might also suggest visiting the Water Conservation Garden https://thegarden.org/ for ideas. I really appreciate that the artificial turf has been scrapped. It causes problems to dogs paws, it is hot, and it leeches microplastics into the environment.
Let keep this place as natural as possible. Native, natural, yet cultivated can be appealing.

I147-2 Secondly, I urge that the number of parking spaces be reduced. I don't think more than 100 is necessary, but I would go with even half that. For the same reasons as above, more natural space is better for the public. It is scientifically proven to increase the well-being of people when they have natural spaces to visit. You could add more bike racks to encourage us locals to ride our bikes in!

I147-3 Which leads to my next point, a protected bike lane is a must along South Grade, to protect the people, espeically children who will ride in. South Grade is twisty and I witness people going fast.

Thank you so much for your consideration,

Kim Hales
Biology Professor-Retired

Comment Letter I147 Response: Comments I147-1 through I147-3

I147-1 This comment suggests that the project incorporate native and California-friendly plantings. Refer to MR-16 (Scope of the RDEIR); landscaping was not required to be analyzed in the 2026 Recirculated Draft EIR. Nonetheless, the County acknowledges this suggestion. No changes to the 2026 Recirculated Draft EIR are needed.

I147-2 The commenter requests reducing parking and adding more bike racks. Refer to MR-16 (Scope of the RDEIR); bike racks were not required to be analyzed in the 2026 Recirculated Draft EIR. Refer to MR-17 (Project Scope and Alternatives) regarding the project's design. No changes to the 2026 Recirculated Draft EIR are needed.

I147-3 The commenter expresses concerns about bicycle safety and requests a protected bike lane along South Grade Road. Refer to MR-21 (Pedestrian and Bicyclist Safety); safety impacts to pedestrians and bicyclists would be less than significant. No protected bicycle lane is necessary and no changes to the 2026 Recirculated Draft EIR are needed.

Comment Letter I148: Laurie Halihan, August 29, 2026

Comment Letter I148

From: Laurie Hallihan
To: CEQA_CountyParks; alpinemidgelh@gmail.com
Subject: [External] Alpine Park Project (SCH No. 2021030196)
Date: Saturday, August 29, 2026 3:52:31 PM

Laurie Hallihan
1412 Louise Drive
Alpine, CA 91901

Megan Doran
Project Manager
Department of Parks and Recreation
County of San Diego, Parks and Recreation
5500 Overland Avenue, Suite 410, San Diego, CA 92123

Dear Ms. Doran,

I148-1

Thank you for the opportunity to comment on the Alpine Park Project's ("Project") Recirculated Draft Environmental Impact Report (DEIR). My name is Laurie Hallihan and have been a resident of Alpine for 25 years. All of those 25 years have been spent going to Wrights Field on nearly a daily basis. I have also been a State Farm Insurance agent for all of those 25 years. I am stunned that this fight is continuing with the county since it is very obvious the residents of Alpine do NOT want this at this location. I speak to most of the community members on a regular basis and I literally have met 2 people who want this park of the hundreds I have talked to on this issue.

I am absolutely not opposed to a park in Alpine, it feels very manipulative to submit a new DEIR with boilerplate language that is not addressing the core issues. All the county is doing is antagonizing their constituents. I can tell you I will be voting out everyone currently at the county.

1. I would like to know why the county is not listening to the Alpine citizens?

I148-2

2. Transportation: What is being done to protect this area that is ALL residential large acreage homes? I would anticipate more lawsuits about loss of property values caused by the county placing a massive sports complex in this location. It needs to move to a move central location in town. This complex will bring more crime as well. Will there be 24 hour police oversight?

I148-3

3. Biological resources: What is the county doing to protect this grassland area that is one of the last grasslands in California? Again, the biological disturbance that will happen to the nature here will be devastating. Again, this will cause property values to go down. People live in this area to have quiet in nature. Not a massive sports complex. It is NOT the right place for this.

4. Hazards and Hazardous Materials: I do not see that the county has address the inevitable lawsuits that will arise from being so close the Joan MacQueen school. The kids will absolutely be heading over to this area, increasing the foot traffic in Wright's Field and potentially causing harm to the endangered species. What is the county doing the protect the kids from getting hurt at the park and another lawsuit against the county for destroying the remaining area of Wright's Field?

I148-4

5. Wildfires: WHEN a wildfire starts in this area, how is the county intending to protect all the neighboring homes that will likely catch on fire from all these additional structures?

I148-5

I would like a response that is not AI or a template. I think we ALL would like that response from these bulldozing tactics that are being implemented against the Alpine community.

Thank you for listening to this input. Please email me at alpinemidgelh@gmail.com

Sincerely,

Laurie Hallihan

Comment Letter I148 Response: Comments I148-1 through I148-5

I148-1 The commenter expresses opposition to the project and asserts that the 2026 Recirculated Draft EIR does not address the project's core issues. As described in MR-16 (Scope of the RDEIR), the 2026 Recirculated Draft EIR was required to address only the issues identified in the Superior Court's June 9, 2025 Minute Order and January 20, 2026 Writ of Mandate. No changes to the 2026 Recirculated Draft EIR are needed.

I148-2 While this comment is labeled "Transportation", the commenter expresses concern about property values and crime. CEQA requires an analysis of a project's potential effects on the environment. Under CEQA Guidelines Section 15131(a), this excludes the economic or social effects of a project, unless those effects would also result in a physical impact on the environment. Quality of life and property values are social and economic effects that are not required to be studied under CEQA. Additionally, please refer to MR-16 (Scope of the RDEIR); these issues were not required to be analyzed in the 2026 Recirculated Draft EIR. While public safety is beyond the scope of the 2026 Recirculated Draft EIR, please refer to MR-19 (Wildfire Ignition and Spread) regarding the security measures that would be implemented on the project site, including a live-on volunteer, maintenance staff, and park ranger to monitor and enforce regulations. No changes to the 2026 Recirculated Draft EIR are needed.

I148-3 The commenter expresses concerns about proximity to Joan MacQueen school, children traveling to the project site, and impacts to grasslands and biological resources due to public access. Refer to MR-16 (Scope of the RDEIR); hazards and schools were not required to be analyzed in the 2026 Recirculated Draft EIR. Refer to MR-21 (Pedestrian and Bicyclist Safety) regarding the safety of pedestrians, including children, traveling to the project site. Additionally, refer to Section 4.4.4 of Volume 2, which concluded that all impacts to biological resources would be less than significant with mitigation incorporated. No changes to the 2026 Recirculated Draft EIR are needed.

I148-4 This comment asks about fire protection for nearby residences. Refer to MR-19 (Wildfire Ignition and Spread); the project would not exacerbate wildfire risk. No changes to the 2026 Recirculated Draft EIR are needed.

I148-5 The commenter requests a response to their submitted comments. Refer to responses I148-1 to I148-4 above regarding the comments submitted in Comment Letter I148.

Comment Letter I149: Don Hohimer, September 14, 2026

Comment Letter I149

From: Don Hohimer
To: CEQA_CountyParks
Subject: [External] Alpine County Park Project
Date: Monday, September 14, 2026 2:48:30 PM

Dear Ms. Doran,

I149-1 I am writing regarding the Recirculated Draft EIR for the Alpine County Park Project.

Alternative 5, the Passive Park Alternative, is the superior option. The project area already functions as a natural park, featuring rare and endangered native grassland and Engelmann Oak woodland habitats. It provides scenic trails for walking, hiking, and riding, making it a highly valued natural resource for the Alpine community.

I149-2 As previously noted during past proposals for the site, the destruction of these rare native habitats presents an unmitigatable impact and violates environmental regulations.

I149-3 Should the County seek to develop a park with sports amenities, underutilized properties owned by the Grossmont and Alpine School Districts along Alpine Boulevard present viable alternatives. These sites are safely accessible and already supported by taxpayer-funded school bonds.

I149-4 Wright's Field requires gentle stewardship rather than extensive development. I strongly urge the County to select Alternative 5.

Sincerely,

Don Hohimer
Alpine

Comment Letter I149 Response: Comments I149-1 through I149-4

I149-1 The commenter states they prefer a passive park alternative for the project. This preference is noted, but the 2026 Recirculated Draft EIR was required to address only the issues identified in the Superior Court's June 9, 2025 Minute Order and January 20, 2026 Writ of Mandate, which does not include the project's alternatives analysis, as described in MR-16 (Scope of the RDEIR). Refer to MR-17 (Project Scope and Alternatives) regarding the project's design. No changes to the 2026 Recirculated Draft EIR are needed.

I149-2 The commenter asserts that the project would result in significant and unmitigable impacts to rare native habitats. Refer to MR-16 (Scope of the RDEIR); this issue was not required to be analyzed in the 2026 Recirculated Draft EIR. The 2026 Recirculated Draft EIR was required to revise specific aspects of the western spadefoot and pallid bat analyses; impacts to sensitive natural communities are beyond the scope of the 2026 Recirculated Draft EIR. Regardless, thresholds 2 and 3 in Section 4.4.4 of Volume 2 analyze impacts to sensitive natural communities and wetlands. As discussed in Section 4.4.4 of Volume 2, the project would be required to implement compensatory habitat-based mitigation and restoration to reduce potential impacts to sensitive vegetation communities to a less than significant level. All potential impacts to biological resources would be mitigated to a less than significant level, and there would be no significant and unavoidable impacts. No changes to the 2026 Recirculated Draft EIR are needed.

I149-3 The commenter recommends local school facilities as alternative locations for the project. This preference is noted, but the 2026 Recirculated Draft EIR was required to address only the issues identified in the Superior Court's June 9, 2025 Minute Order and January 20, 2026 Writ of Mandate, which does not include the project's alternatives analysis, as described in MR-16 (Scope of the RDEIR) and MR-17 (Project Scope and Alternatives); the project's alternatives analysis was not required to be analyzed in the 2026 Recirculated Draft EIR, and an alternate location is not considered feasible. No changes to the 2026 Recirculated Draft EIR are needed.

I149-4 The commenter reiterates their preference for a passive park alternative but does not address the adequacy of the environmental analysis in the 2026 Recirculated Draft EIR. Also refer to responses I149-1 and I149-3 above. No changes to the 2026 Recirculated Draft EIR are needed.

Comment Letter I150: Neil Howell, September 14, 2026

Comment Letter I150

From: HowellN
To: CEQA_CountyParks
Subject: [External] Alpine County Park Project - SCH#2021030196
Date: Monday, September 14, 2026 12:00:56 PM

for Megan Doran at, Project Manager, County of San Diego, Department of Parks and Recreation

I150-1

Overall, I'm looking forward to the park coming to our community, and I know many are as well.

We have a very vocal minority that wants to prevent the park in any way, even though they verbally say otherwise. I used to be part of the group early on, until I realized their agenda was not about addressing concerns, and instead to stop the park. Their anti-park approach is very strong and work hard at getting supporters and at best, twisting the facts to get people's support.

I'm located off a street from South Grade road, not far from the proposed park. So while I'm not directly impacted by living near the location, I'm pretty close.

I have loved the park and the plans since the beginning. I have not kept up on the recent tweaks. All that said, while there are some things I would prefer changed, that would apply to anything, really. Any of the bigger concerns, say fire, have been addressed. While maybe not to what I would see as a solution, it has addressed the requirements.

I150-2

My concern is only related to the traffic on Southgrade road. Which I realize is not technically your department. I'm assuming, which could be a bad approach, is that if the traffic becomes a problem, then caltrans will address it.

Neil Howell
2667 Elinge Drive

Comment Letter I150 Response: Comments I150-1 through I150-2

I150-1 The commenter expresses support for the project and acknowledges the adequacy of the 2026 Recirculated Draft EIR's wildfire analysis. No changes to the 2026 Recirculated Draft EIR are needed.

I150-2 The commenter expresses general concern related to traffic on South Grade Road but does not raise a specific issue with the analysis in the 2026 Recirculated Draft EIR. No changes to the 2026 Recirculated Draft EIR are needed. However, for the commenter's information, if there is a concern related to traffic on South Grade Road in this area, this would be addressed by County of San Diego DPW as this is a County-maintained road. County of San Diego DPW would continue to regularly analyze traffic incidents, reports, and violations to assess the conditions and would recommend improvements if deemed necessary. Anyone wishing to file a concern or complaint may contact the Transportation Division's front desk at 858-694-3850. Concerns or complaints related to County Maintained Roads can also be submitted through the 'Tell Us Now' mobile app available for download in either the Google Play Store or Apple App Store. Additionally, road concerns can be reported by filling out and submitting a Road Service Request Form, available at: https://www.sandiegocounty.gov/content/sdc/dpw/roads/Roads_Service_Request.html

Comment Letter I151: Judy, September 14, 2026

Comment Letter I151

From: Judy@teamspady.com
To: CEQA_CountyParks
Subject: [External] Alpine County Park Project - SCH#2021030196
Date: Monday, September 14, 2026 4:33:29 PM

Dear Megan,

I151-1 I am opposed to the Alpine County Park project as currently proposed. My biggest concerns are the additional traffic and what that could mean during a wildfire evacuation. Our roads are already limited, and adding a large park that brings more cars into the area seems like an unnecessary safety risk.

I would much rather see this land remain primarily open space with a smaller, less developed park that better fits Alpine.

Thank you for considering the concerns of local residents.

Comment Letter I151 Response: Comment I151-1

I151-1 The commenter expresses concern about traffic and emergency evacuation during a wildfire and mentions a preference for a smaller, less developed park. This preference is noted, but the 2026 Recirculated Draft EIR was required to address only the issues identified in the Superior Court's June 9, 2025 Minute Order and January 20, 2026 Writ of Mandate, which does not include the project's alternatives analysis, as described in MR-16 (Scope of the RDEIR). Refer to MR-17 (Project Scope and Alternatives) regarding the project's design. Refer to MR-18 (Emergency Evacuation) regarding project impacts to emergency response and evacuation, which were not required to be analyzed in the 2026 Recirculated Draft EIR. Please also refer to MR-9 (Wildfire) in Volume 4 Chapter 3, *Response to Comments on the Draft EIR And Recirculated Draft EIR* for additional information on emergency evacuation. No changes to the 2026 Recirculated Draft EIR are needed.

Comment Letter I152: Peggy Katz, September 14, 2026

Comment Letter I152

From: Peggy Katz
To: CEQA, CountyParks
Subject: [External] Alpine proposed park
Date: Monday, September 14, 2026 4:19:34 PM

I152-1

After reviewing the most recent information about this park I'm convinced that the county will do whatever they want irregardless of the wishes of a great number of residents. On paper it sounds like an awesome resource for both the community and county. However I don't see the wisdom of developing this in an area with an extreme risk of devastating fire. Actually this area has experienced sustained 70 mph winds with humidity 3% or lower, terrifying indeed! Not just high gusts by scary sustained winds. How would both residents and park patrons really be able to safely evacuate if necessary on the curvy narrow two lane road?

The studies and information provided seem a bit biased in favor of this project and I don't believe they accurately reflect the experiences and knowledge of many local people who live here and actually use the area for recreational activities like hiking, horseback riding and observing the flora, fauna and geology of this unique area. A good many of our residents would like a quieter less ambitious project that would enhance the uses we already enjoy. As you should know, large populations of recreating humans do increase the fire risk. Too many people these days don't follow rules, regulations or restrictions further increasing fire risk!

One basic purpose of government is to protect the people not increase possible danger and destruction of an already 'on edge' population now facing Santa Ana wind season (which can now occur year around). Due to several years of drought combined with a severe shortage of adequate rain, this area is at extreme risk of fire. Most of the rains in the past few years haven't provided the essential deep ground water needed to sustain the flora in much of Alpine. Our rare Engelmann oaks showing signs of extreme stress, quite obvious to those who know them!

Please protect our community by scaling back this too ambitious project and give us the lessor project that many of us feel would be safer!

Peggy Katz, Master Gardener

Sent from my iPad

Comment Letter I152 Response: Comment I152-1

I152-1 The commenter expresses concern about wildfire ignition and evacuation and states they would prefer a quieter, less ambitious project. Refer to MR-18 (Emergency Evacuation) regarding project impacts to emergency response and evacuation, which were not required to be analyzed in the 2026 Recirculated Draft EIR. Please also refer to MR-9 (Wildfire) in Volume 4 Chapter 3, *Response to Comments on the Draft EIR And Recirculated Draft EIR* for additional information on emergency evacuation. Also refer to MR-19 (Wildfire Ignition and Spread); the project would not exacerbate wildfire risk. The preference for a smaller project is noted, but the 2026 Recirculated Draft EIR was required to address only the issues identified in the Superior Court's June 9, 2025 Minute Order and January 20, 2026 Writ of Mandate, which does not include the project's alternatives analysis, as described in MR-16 (Scope of the RDEIR). Refer to MR-17 (Project Scope and Alternatives) regarding the project's design. Impacts to Engelmann oak woodlands are analyzed under Threshold 2 of Section 4.4.4.3 in Volume 2, which concluded that impacts would be less than significant with mitigation. No changes to the 2026 Recirculated Draft EIR are needed.

Comment Letter I153: Tina Kawabata, September 14, 2026

Comment Letter I153

From: TinaMarie Kawabata
To: CEQA_CountyParks
Subject: [External] Alpine Regional Park
Date: Monday, September 14, 2026 1:47:45 PM

To whom it may concern:

I153-1 Thank you for your consideration in approving this park. It will be a very welcome addition to Alpine and our families. Our children have no place to gather or recreate and instead spend a lot of their time riding bikes, skateboards or walking on Alpine Blvd, which is very dangerous. The small community parks that Alpine does have are not maintained and are very unsafe. I took my 3 year old granddaughter to the one near our library, but it was so unsafe and unsightly, we could not stay. The equipment was broken, vulgar graffitti, sharp metal pieces from non maintained equipment, broken chains on the swings, it was horrible. When others say Alpine has parks, that's what we have. I am so excited for this park for my grandchildren and other families to enjoy "together". This is such a needed area. I would also comment that it's very disappointing we never got our High School. Parents travel 20 miles one way just to get their kids to school. That seems very unreasonable, costly and unsafe, not to mention our kids are spread out and separated from our community. Once again, thank you for your consideration in approving this park.

Sincerely,
100% on board.

Comment Letter I153 Response: Comment I153-1

I153-1 This comment expresses support for the project and does not address the adequacy of the environmental analysis in the 2026 Recirculated Draft EIR. No changes to the 2026 Recirculated Draft EIR are needed.

Comment Letter I154: Amber Lewis, September 4, 2026

Comment Letter I154

From: Amber Lewis
To: CEQA_CountyParks
Subject: [External] Alpine County Park Project - SCH#2021030196
Date: Friday, September 4, 2026 6:41:00 PM

Hello,

I154-1

My name is Amber Lewis and I am an Alpine Resident and community volunteer. I have two children, ages 8 and 11, who are very active and would love a safe place to play that offers many activities. Though we love the parks and recreational areas "down the hill," we are long overdue for something meaningful in Alpine.

I am also Cubmaster for our local Cub Scout pack and a committee member in our Scout troop. This park would offer a fun outdoor space for scouts of all ages to work and learn together to achieve their advancements. Though we do spend time in Wrights Field as well, the park would offer a safe and well maintained area to host other activities such as bike safety.

My family has lived in Alpine since the 90s. I'm proud to show my kids where I grew up and hope to give them fun places to play outdoors and enjoy their community.

Please feel free to reach out for additional information or comments. I hope to see positive progress on this project!

Amber Lewis
619-887-8787

Comment Letter I154 Response: Comment I154-1

I154-1 This comment expresses support for the project and does not address the adequacy of the environmental analysis in the 2026 Recirculated Draft EIR. No changes to the 2026 Recirculated Draft EIR are needed.

Comment Letter I155: Anne Norton, September 14, 2026

Comment Letter I155

From: anne norton
To: CEQA_CountyParks
Subject: [External] Fw: Public Comment on the 2026 Recirculated Draft Environmental Impact Report; Apline County Park Project--SCH No. 2021030196
Date: Monday, September 14, 2026 12:55:57 PM
Attachments: Alpine_Park_PublicNotice_Comment_Sept2026_ANorton.pdf

Dear Ms. Doran,

I155-1 Please find my attached comment letter regarding the Alpine County Park Project.

Please confirm receipt of my comments.

Thank you,

Anne Norton
mosacisbyannie@cox.net

PUBLIC COMMENT ON THE 2026 RECIRCULATED DRAFT ENVIRONMENTAL IMPACT REPORT
Alpine County Park Project — SCH No. 2021030196
SUBJECT: Inadequate Public Notice and Incomplete Project Description

September 14, 2026

Megan Doran, Project Manager
County of San Diego, Department of Parks and Recreation
5510 Overland Avenue, Suite 270
San Diego, CA 92123

Email: CountyParksCEQA@sdcounty.ca.gov

RE: Comments on Adequacy of Public Notice for the 2026 Recirculated Draft EIR, Alpine County Park Project (SCH No. 2021030196) — Request for Extended Comment Period and Supplemental Disclosure

Dear Ms. Doran:

I155-2 I am a resident of Alpine, California, for over 37 years and have been actively engaged at every opportunity with the Alpine County Park Project. These comments address a separate but fundamental concern, the adequacy of the County's public notice for the 2026 Recirculated Draft EIR comment period, and an unresolved question about the project's physical description that arose at the County's own public meeting.

I. THE COUNTY'S OWN DISCLOSURE CONFIRMS THAT FEWER THAN HALF OF ALPINE HOUSEHOLDS RECEIVED MAILED NOTICE

I155-3 At the September 2026 Alpine Community Planning Group (ACPG) meeting, County staff confirmed that the Department of Parks and Recreation mailed notices for the 2026 Recirculated Draft EIR comment period to approximately 2,300 households. Staff later shared in a follow up email that the Alpine community contains approximately 6,700 total parcels/households according to the County's own GIS database connected to the Assessor/Recorder's office. By the County's own numbers, therefore, more than 4,400 Alpine households, or roughly 66 percent of the community, received no mailed notice whatsoever.

County staff noted that the mailing radius was voluntarily extended beyond the legally required 500-foot minimum to approximately one mile. I acknowledge that the County exceeded its minimum legal obligation in this regard, and I appreciate that effort. However, exceeding the bare minimum is not the same as providing notice to reach the community affected by this project.

Notifying one third of the community of Alpine fails to notify the community at large which the project will directly be affected.

The reason is straightforward and rooted in Alpine's physical character: Alpine is a rural and semi-rural community where many properties sit on two or more acres. Unlike a grid-pattern urban neighborhood where a one-mile radius can encompass thousands of closely spaced parcels, Alpine's large-lot development pattern means that a one-mile radius captures a relatively small number of households. The County's own parcel count confirms this — 2,300 notices from a community of 6,700 households is the predictable arithmetic result of applying a distance-based mailing radius to a sprawling, low-density landscape. A radius that is legally generous by urban standards is *practically inadequate* by Alpine's own geography.

CEQA's notice requirements exist to serve the statute's core purpose which is ensuring that the public has a meaningful opportunity to participate in environmental review before a decision is made. A notice that structurally excludes nearly two-thirds of the community whose land, roads, viewsheds, wildlife habitats, and emergency evacuation routes are directly affected by the project does not fulfill that purpose, regardless of whether it satisfies the minimum geographic radius in the abstract.

I155-3 cont.

II. THIS IS A COUNTY PARK, NOT A NEIGHBORHOOD PARK, AND THE SCOPE OF NOTICE SHOULD REFLECT THAT

The Alpine County Park is proposed as a regional facility to be built, operated, and maintained by the County of San Diego for the benefit of County residents broadly. It is not a neighborhood park or a block-level community garden. The County own documents for this project states this is a "County park," not merely a "community park", as indicative of the title of this project. A regional park generating hundreds of vehicle trips per day on South Grade Road, drawing visitors from across the County, occupying land within a Very High Fire Hazard Severity Zone adjacent to the entire Alpine community, and whose project review has already proceeded through multiple environmental documents, a public hearing process, and a contested Superior Court writ of mandate. This is a project of community-wide, and arguably County-wide, significance.

The County's own documentation of public controversy surrounding this project, including years of contested review, litigation, a court-ordered recirculation, and the communities ongoing engagement, establishes that community-wide notice was warranted. The appropriate baseline for a project of this scope and controversy was notification to all approximately 6,700 Alpine households, plus outreach to Alpine-area businesses, community organizations, and the broader County population that will use this facility. The County instead mailed notices to fewer than one in three Alpine addresses. Measured against the County-wide population this facility is intended to serve, the shortfall is starker still. San Diego County contains approximately 1.17 million households (U.S. Census Bureau, American Community Survey 5-year estimates), so the County's 2,300 mailed

notices reached roughly two-tenths of one percent, or about 0.2 percent, of the County households whose residents are the intended beneficiaries and users of this regional park. A park the County describes as serving County-wide interests was noticed to a fraction of one percent of County households.

III. RELIANCE ON A SELF-SELECTED INTEREST LIST DOES NOT CURE THE INADEQUACY

The County supplemented its mailed notices by sending email notices to individuals, agencies, and organizations that had previously attended project-specific public meetings, expressed interest in the project, or otherwise contacted the County for updates. This is a self-selected list, it necessarily excludes the very residents who were not informed about earlier stages of the process. A resident who never received notice of a 2021 scoping meeting cannot appear on a 2026 interest list compiled from that meeting's attendees. The County's supplemental email outreach therefore reaches primarily those who already knew about the project, reinforcing rather than correcting the information gap created by the narrow initial mailing.

I155-3 cont.

Providing documents at the Alpine public library and county offices, and publishing notices in local newspapers, similarly does not substitute for direct mailed notice to affected households. These measures require residents to seek out information about a project they may not know exists. This is the inverse of what meaningful public notice is designed to accomplish.

IV. LOW PUBLIC MEETING ATTENDANCE REFLECTS INADEQUATE NOTICE, NOT LACK OF PUBLIC INTEREST

It has been suggested, explicitly or implicitly, that low attendance at the project's public meetings reflects low community interest, which in turn supports a conclusion that the comment record is adequate. That inference is unjustified where the notice itself was structurally insufficient to reach the broader community.

Critically, the notice failure is not a theoretical concern but rather on display at the September 2026 Alpine CPG meeting itself. Multiple individuals who attended that meeting, engaged, civically active residents who show up to community planning sessions, stated they had been entirely unaware that the 2026 Recirculated Draft EIR comment period was open or that a project meeting had been held. If the County's outreach is failing to reach residents who actively participate in local government, it is failing comprehensively. These are precisely the people a well-designed notice program should be reaching first.

The Alpine community's interest in this project is demonstrably high. The project has generated contested litigation, contentious local discussion, and a polarization of community opinion that the County itself has acknowledged. A public meeting that draws limited attendance under these circumstances is far more likely to reflect a notice failure than a community that has decided it has

nothing to say. Inadequate notice and low attendance form a self-reinforcing cycle that CEQA's participation requirements are designed to break, not ratify.

I155-3 cont.

CEQA's purpose is to ensure that the environmental consequences of proposed projects are evaluated with the benefit of the full range of public knowledge and perspective. Residents who were not notified cannot submit comments, identify local knowledge about sensitive resources, or raise concerns about project impacts on their properties, roads, and community character. Their silence is not consent. It is the predictable result of not being told.

V. UNANSWERED PROJECT DESCRIPTION QUESTION: BERM HEIGHTS ALONG SOUTH GRADE ROAD

At the County's public meeting on this project, a member of the public asked about the height of the berms proposed along South Grade Road for all anticipated construction phases of the project. A County representative initially stated the berms would not exceed four feet in height, then corrected herself, stating she could not accurately recall the correct figure. That exchange concluded without a definitive answer being provided to the public.

I155-4

This is not a minor detail. Berms of significant height along South Grade Road would permanently alter the visual character of a primary corridor through Alpine, affecting the views, light, and sense of open space experienced by residents, drivers, cyclists, and pedestrians using that road daily. The height, extent, and design of berms for all project phases, including Phase 1 and all subsequent phases, is a basic component of the project's physical description that must be disclosed in the EIR. An EIR whose project representatives cannot accurately state a major physical feature at a public meeting raises a legitimate question about whether the project description in the RDEIR is complete and accurate.

I formally request that the County provide, as part of its response to public comments, a complete and definitive disclosure of the proposed berm heights along South Grade Road for each phase of project construction, including the elevations at various points along the corridor, the footprint of each berm feature, and the visual impact analysis conducted for each berm segment in each phase. It is unclear what elements are included in each phase of the project. This information needs to be included in the RDEIR with sufficient specificity.

VI. SUBSTANTIVE CONCERNS COMPOUNDED BY THE NOTICE FAILURE: TRAFFIC SAFETY, WILDFIRE, AND BIOLOGICAL RESOURCES

I155-5

The notice concerns above are not procedural technicalities. They matter because the recirculated analysis contains substantive deficiencies that affected residents would have raised had they been told the comment period was open. I incorporate below three areas in which the un-noticed majority of the Alpine community has the most direct stake.

I155-6 A. Traffic and safe access along South Grade Road. The recirculated transportation analysis (Section 4.17 and Appendix I1) acknowledges that the northeastbound approach at Driveway #2 fails County sight-distance standards under existing conditions due to vegetation and rock outcroppings, yet defers the corrective clearing and grading to site-plan review with no plan, drawing, clearing prescription, or measurable performance standard in the EIR itself. The crash history identifies a 2016 pedestrian fatality approximately 145 feet from the primary project driveway and a 2012 single-vehicle fatality in the same vicinity, both attributed to driver or pedestrian conduct on the basis of law-enforcement fault determinations without independent review of roadway geometry, sightlines, or curvature. The parking analysis projects a combined peak-day demand of approximately 250 vehicles against a proposed 240-space on-site supply, with overflow to be managed through a volunteer and ranger scheduling protocol that carries no numeric trigger for County intervention, no independent monitoring, and no physical mitigation backstop. And the addendum reverses the 2023 FEIR's four-way stop control at the Calle de Compadres/South Grade Road intersection in favor of side-street stop control, relying in part on outdated speed data and on flat-terrain sight-triangle methodology that does not account for the roadway's actual rolling vertical profile. Every one of these conditions falls on the same corridor as the unanswered berm-height question raised in Section V above, and on the residents least likely to have received notice.

I155-7

I155-8

I155-9

I155-10 B. Wildfire risk and evacuation capacity. The Appendix J1 fire-behavior modeling reports that under offshore Santa Ana wind conditions the site experiences flame lengths up to 18.1 feet, spread rates of 6.2 miles per hour, and ember spotting up to 1.1 miles in a site within a Very High Fire Hazard Severity Zone immediately adjacent to residential neighborhoods. Notwithstanding that data, the recirculated sections never state an independent significance conclusion for fire risk under existing conditions standing alone, and they treat compliance with code-required fire-safe construction standards and Cal Fire Title 19 defensible-space dimensions as project mitigation capable of reducing an otherwise-significant impact, rather than as part of the regulatory baseline.

I155-11 Nor does the analysis model South Grade Road's carrying capacity under combined evacuation load including park visitors, existing Alpine residents, and the residents of reasonably foreseeable nearby development all leaving simultaneously during a wind-driven fire event. The households that received no mailed notice are the same households that would be on that road.

I155-12 The recirculated analysis also fails to address the ignition risk the project itself would introduce. A public park draws concentrated, recurring recreational use, and barbecues, charcoal grills, portable propane and camp stoves, and similar open-flame or ember-producing appliances are among the most common recreational ignition sources in wildland-adjacent settings. The RDEIR does not disclose whether permanent barbecue or grill facilities are proposed at this site, how many, where they would be sited relative to fuel beds and the adjacent residential edge, or what seasonal or red-flag operational restrictions would govern their use, nor does it analyze visitor-brought grills and stoves as an ignition source at all. On a site the County's own modeling shows capable of 18.1-foot flame lengths, 6.2 mile-per-hour spread rates, and ember spotting up to 1.1 miles under Santa Ana

I155-12 cont.

conditions, introducing a routine open-flame use immediately upwind of residential neighborhoods is a new, project-created ignition hazard that requires disclosure and independent analysis. Given those conditions, the appropriate measure is a park-wide prohibition on barbecues, charcoal grills, and open flame of any kind, adopted as an enforceable mitigation measure in the mitigation monitoring and reporting program rather than left to signage or park policy, together with the fuel-clearance, spark-arrestor, ash-disposal, and enforcement provisions that any such facility would require if the County declines to prohibit them.

I155-13

C. Biological resources and cumulative habitat fragmentation. The western spadefoot's populations in southern San Diego County exhibit reduced effective population sizes and cannot absorb incremental habitat fragmentation from multiple concurrent projects without additive and potentially synergistic harm. Local residents hold precisely the site-specific knowledge of seasonal pooling, wildlife movement, and habitat conditions that a cumulative analysis of this kind depends on, and most of them were never asked.

I155-14

I raise these three areas here to make the consequence of the notice shortfall concrete. Thousands of Alpine households had no opportunity to comment on a deferred sight-distance fix at a driveway serving their primary road, a baseline wildfire finding the EIR does not make, or a habitat-fragmentation analysis that omits the other projects surrounding them. A comment record assembled without those residents cannot be characterized as complete.

VII. THE INABILITY TO MITIGATE WILDFIRE, TRAFFIC, AND BIOLOGICAL IMPACTS AT THIS SITE REQUIRES REEVALUATION OF ALTERNATIVE LOCATIONS

I155-15

The three concerns described in Section VI share a feature that warrants the County's attention. None of them is a drafting oversight that another round of analysis can cure. Each arises from the physical characteristics of this site. The park would occupy land within a Very High Fire Hazard Severity Zone immediately adjacent to residential neighborhoods, served by a constrained two-lane corridor. Its primary driveway would open onto a roadway with a sight-distance deficiency and a rolling vertical profile that exist today, before any construction. And it would sit within habitat supporting species whose populations are already reduced to the point that they cannot absorb additive fragmentation. Constraints of that character are not resolved by better mitigation language. They are resolved, if at all, by locating the project elsewhere or by substantially reducing the scope to a passive park.

The recirculated record itself suggests as much. In each of the three resource areas, the RDEIR closes the gap between a potentially significant impact and a less-than-significant finding by relying on something other than enforceable, site-specific mitigation. The sight-distance correction is deferred to future site-plan review with no plan, prescription, or measurable performance standard in the EIR. Parking overflow is addressed by a volunteer and ranger scheduling protocol with no

numeric trigger, no independent monitoring, and no physical backstop. Fire risk is brought to less-than-significant by compliance with code-required fire-safe construction standards and Cal Fire Title 19 defensible-space dimensions which are requirements that apply to the site regardless of this project. And cumulative habitat fragmentation receives no cumulatively-considerable determination at all. CEQA does not permit the formulation of mitigation to be deferred to a later date, and it requires that mitigation be fully enforceable through permit conditions, agreements, or other binding measures. Measures of the kind the RDEIR relies on do not meet that standard.
Where the mitigation record for a proposed site is that thin, the alternatives analysis is not a formality, it is the operative safeguard. CEQA requires an EIR to describe a range of reasonable alternatives to the project, or to the location of the project, that would feasibly attain most of the basic project objectives while avoiding or substantially lessening the project's significant effects, and it requires the County to disclose its reasons if it concludes that no alternative location is feasible. A County park serving County-wide recreational demand is, by its nature, a use with locational flexibility. The objectives this facility is meant to achieve are not intrinsically tied to a parcel in a Very High Fire Hazard Severity Zone on a two-lane mountain road with a documented fatal-crash history.

I155-15 cont.

I therefore request that the County revisit the alternatives analysis for this project and, in doing so: (i) identify and evaluate alternative County-owned, enter into a joint-use agreement, or reasonably acquirable sites located outside a Very High Fire Hazard Severity Zone and served by a road network without an existing, measured sight-distance deficiency; (ii) evaluate a reduced footprint of a passive alternative at the proposed site which would lower visitor capacity, reduced parking supply, a narrowed development footprint, or a phasing sequence that defers the highest-impact elements, and disclose the impact reductions each would achieve; (iii) state, with substantial evidence rather than conclusory assertion, the basis for rejecting any alternative location as infeasible; and (iv) recirculate the revised alternatives analysis for public comment, with notice to all approximately 6,700 Alpine households, so that the residents who would bear the wildfire, traffic, and habitat consequences of this siting decision have a genuine opportunity to be heard on whether a better location exists.

VIII. REQUEST FOR EXTENDED COMMENT PERIOD AND SUPPLEMENTAL NOTICE

Given the structural shortfall in public notice with fewer than half of Alpine households receiving mailed notification for a county-wide park, and the unresolved public question about a basic project feature, I respectfully request that the County:

I155-16

(a) Issue supplemental mailed notice to all remaining Alpine households (the approximately 4,400 parcels not reached by the current mailing) and provide an additional comment period of no fewer than 45 days from the date of that supplemental notice, consistent with the standard RDEIR comment period provided under CEQA;

(b) Provide a written response to the berm-height question posed at the public meeting, and if the answer requires any revision or supplementation to the project description in the RDEIR, recirculate that portion of the document for public comment; and

(c) Evaluate and adopt a more comprehensive public outreach protocol for this project going forward, one that is calibrated to Alpine's large-lot, sprawling geography and the project's county-wide character, not to an urban-density mailing radius. This project's history of low public-meeting attendance, persistent community controversy, and sustained litigation is itself evidence that the existing outreach approach has not been adequate to the task. The County should go back to the drawing board and identify a notification methodology that genuinely reaches all members of the affected community, all approximately 6,700 Alpine households, before any further major project decisions are made; and (d) Respond on the merits to the traffic safety, wildfire, and biological resources concerns identified in Section VI above, and supplement or recirculate the affected analyses as necessary, so that the substantive record is corrected rather than closed on the strength of a comment period that most of the affected community did not know was open; and
(e) Reopen and recirculate the project's alternatives analysis, including alternative locations outside a Very High Fire Hazard Severity Zone and a reduced-intensity passive alternative at the proposed site, as set out in Section VII above, before seeking certification of the Final EIR; and
(f) Disclose whether barbecue, grill, or other open-flame facilities are proposed at the park in any phase, including their number, location, and design, analyze visitor-brought grills and portable stoves as a project-introduced wildfire ignition source under the offshore-wind conditions the County's own fire-behavior modeling assumes, and either adopt a park-wide prohibition on barbecues, charcoal grills, and open flame as an enforceable mitigation measure in the mitigation monitoring and reporting program, or state with substantial evidence why such a prohibition is infeasible.

I155-16 cont.

IX. CONCLUSION

The County has made good-faith efforts within the framework of its standard outreach protocol. I do not question that. What I am raising is that the standard protocol, designed for routine local projects in typical urban or suburban settings, is not commensurate with a project of this scale, controversy, geographic context, and community-wide impact. The result is that a significant majority of the Alpine community has been structurally excluded from meaningful participation in a CEQA process that will determine the character and safety of their community for generations.

I155-17

Lack of effective public outreach has been a recurring pattern throughout this project's history. The comment period for the 2026 RDEIR is not an isolated incident. It reflects a persistent gap between the County's legal minimum obligations and the genuine community engagement that a project of this nature and controversy demands. The County is fully aware that this project has polarized the Alpine community, and that this is a County park serving county-wide interests, not simply a local

I155-17 cont.

neighborhood facility. Both of those facts obligate a higher standard of public notice than has been applied.

CEQA was enacted to ensure that decisions of this magnitude are made with the benefit of full public knowledge and participation. The current notice record does not meet that standard. I urge the County to take the additional steps necessary to achieve genuine community engagement before seeking certification of the Final EIR.

Thank you for considering these comments.

Respectfully submitted,

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Comment Letter I155 Response: Comments I155-1 through I155-17

I155-1 This comment introduces the letter submitted by the commenter. Refer to responses I155-2 through I155-17 below.

I155-2 This is an introductory comment that describes the commenter's relationship with the community and introduces the concerns detailed in subsequent comments. Refer to responses I155-2 through I155-17 below.

I155-3 The commenter expresses disapproval of the County's noticing process, which involved mailed notices to approximately 2,300 households within one mile of the project, and asserts that notice should have been given to the entire Alpine community. As noted by the commenter, the project's one-mile noticing radius exceeded County DPR's standard 500-foot radius. CEQA Guidelines Section 15087 requires notice to be mailed to the last known name and address of all organizations and individuals who have previously requested such notice in writing, and shall also be given by at least one of the following procedures: (1) Publication at least one time by the public agency in a newspaper of general circulation in the area affected by the proposed project. (2)Posting of notice by the public agency on and off the site in the area where the project is to be located. (3) Direct mailing to the owners and occupants of property contiguous to the parcel or parcels on which the project is located.

Project noticing included sending email notices to all parties who have previously expressed interest in the project at project-specific public meetings, previously commented on the Notice of Preparation, previously commented on the 2021 Draft EIR, previously commented on the 2022 Draft EIR, and others who otherwise expressed interest in the project. Additionally, notice was provided on July 31, 2026 in the Alpine Sun newspaper and the San Diego Union Tribune.

The Notice of Availability and the 2026 Recirculated Draft EIR were also made available for review at the Alpine public library, County offices, and posted on the County's website (www.sdparks.org), County Clerk, and CEQANet (https://ceqanet.lci.ca.gov/2021030196/8). In addition, the NOA was provided via direct mail to all mailing addresses within a one-mile buffer of the proposed project, which is well beyond the CEQA requirement of contiguous parcels and beyond the County DPR's standard practice of 500 feet. The County also attended the Alpine Community Planning Group meeting to provide notice regarding the availability of the 2026 Recirculated Draft EIR. These efforts combined indicate a concerted effort in making the 2026 Recirculated Draft EIR accessible to the entire Alpine community during the public review period. The County's noticing process was adequate and went beyond legal requirements.

Additionally, the commenter indicates the park is intended to be a regional park and noticing requirements should reflect that. To clarify, the park is intended to be a locally serving park, not a regional park. The name of the project, Alpine County Park, is merely reflective of it being owned and operated by the County of San Diego Department of Parks and Recreation.

I155-4 The commenter asks about the proposed berm height along South Grade Road as it relates to views, light, and sense of open space. Refer to MR-16 (Scope of the RDEIR); the project's berms were not required to be analyzed in the 2026 Recirculated Draft EIR. However, final EIR Sections 3.3.1 and Threshold 3 of Section 4.1.4.3 in Volume 2 describe the proposed berm and its visual impacts. The design of the park includes a landscaped buffer between the new decomposed granite pathway, which would be constructed alongside South Grade Road, and the park. The height of the buffer on the south end of Phase 1 would be approximately four feet high, then gradually lower moving north toward the park entrance. The buffer area would be planted with a mix of native wildflowers and grasses in keeping with the same low-profile and natural feel that currently exists on the project site. Beyond Phase 1, native trees are proposed in the buffer along with native wildflowers and grasses. The berm is anticipated to increase in height traveling south along South Grade Road due to the area's topography. The EIR adequately discusses and analyzes the proposed berms as written, and no changes to the 2026 Recirculated Draft EIR are needed.

I155-5 This comment introduces the traffic safety, wildfire, and biological resources concerns detailed in comments I155-6 through I155-14 below. Refer to the responses below.

I155-6 The commenter asserts that the recirculated transportation analysis improperly defers corrective clearing for sight distance at Driveway #2. Refer to MR-25 (Driveway #2 Sight Distance) regarding implementation of Driveway #2 sight distance requirements. No changes to the 2026 Recirculated Draft EIR are needed.

I155-7 The commenter states that the project's crash history is not sufficient for analyzing roadway hazards, which they assert should be assessed through a review of roadway geometry, sightlines, or curvature. However, the Addendum to the TIS (Appendix I1) does not assume that the absence of roadway-related fault in past crashes resolves the question of future exposure. The crash history addresses whether an existing roadway design hazard is present, while the parking, sight distance, pedestrian, and bicyclist evaluations address how future park users would interact with South Grade Road and whether the project introduces or substantially increases a traffic hazard. An increase in the number of park users, by itself, does not establish a hazard due to a project design feature under CEQA Appendix G, Criterion XVII(c). The relevant question is whether the project introduces or worsens a design condition that creates a substantial hazard, which Appendix I1 concludes it would not. No changes to the 2026 Recirculated Draft EIR are needed.

I155-8 The commenter asserts that the project's sports programming to address vehicle spillover is not enforceable. Refer to MR-28 (Sports Programming Protocol); the project's parking management program is enforceable, includes a numeric trigger for County intervention, and not required to conclude a less than significant impact to pedestrian and bicyclist safety, and no changes to the 2026 Recirculated Draft EIR are needed.

I155-9 The commenter asserts that the proposed side-street stop control at the Calle de Compadres/South Grade Road intersection is based on outdated speed data and doesn't account for the terrain of South Grade Road.

The roadway curvature and rolling profile are accounted for in two separate ways, as described in Appendix I1. First, they are inherently reflected in the observed operating speeds because drivers select their speed in response to the roadway environment they actually experience. Second, and more importantly, the physical geometry was evaluated directly during the field sight-distance measurements. The project's traffic engineer measured the available sight distance along the actual roadway profile to the point where a crest curve, horizontal curve, vegetation, terrain, or other physical feature obstructed the driver's view. Thus, if a vehicle or object disappears behind a crest or through a dip, the available sight distance ends at that obstruction. The analysis does not assume a flat or continuously visible roadway.

This is demonstrated by the results at Driveway #1, where the existing vertical crest on South Grade Road is the feature that limits the northbound available stopping sight distance to approximately 425 feet. That measured distance still satisfies the applicable AASHTO stopping sight distance requirement at the conservative 50-mph design speed. The roadway profile is therefore not omitted from the analysis; it is directly reflected in both the observed operating speed and the field-measured available sight distance. Therefore, the analysis in Appendix I1 is adequate, and no changes to the 2026 Recirculated Draft EIR are needed.

The speed data raise a separate issue and, if anything, the conditions under which they were collected make them conservative for the sight-distance analysis. Operating speed is influenced by roadway geometry, posted speed, traffic density, and the amount of interaction or "friction" created by other vehicles. Under lower-volume conditions, drivers generally have greater freedom to select their desired speed because they are less constrained by surrounding traffic. Therefore, the analysis in Appendix I1 is adequate, and no changes to the 2026 Recirculated Draft EIR are needed.

I155-10 The commenter asserts that the recirculated sections should state an independent significance conclusion for fire risk under existing conditions and that they improperly treat compliance with code requirements as project mitigation capable of reducing an otherwise-significant impact, rather than as part of the regulatory baseline. This is incorrect; refer to MR-20 (Baseline Wildfire Risk). No changes to the 2026 Recirculated Draft EIR are needed.

I155-11 The commenter expresses concern about emergency evacuation. Refer to MR-18 (Emergency Evacuation) regarding project impacts to emergency response and evacuation, which were not required to be analyzed in the 2026 Recirculated Draft EIR. Please also refer to MR-9 (Wildfire) in Volume 4 Chapter 3, *Response to Comments on the Draft EIR And Recirculated Draft EIR* for additional information on emergency evacuation. No changes to the 2026 Recirculated Draft EIR are needed.

I155-12 The commenter asserts that the EIR fails to address the ignition risk introduced by the project. Refer to MR-19 (Wildfire Ignition and Spread); the project would not exacerbate wildfire risk. No changes to the 2026 Recirculated Draft EIR are needed.

I155-13 The commenter asserts that by failing to notice the entire community, the County did not receive input that may have bolstered the western spadefoot cumulative analysis. As

described in response I155-3 above, the County's noticing process was adequate and included residents within one mile of the project site, those closest to Wright's Field. Section 4.4 of Volume 2 concluded that impacts to western spadefoot would be less than significant with mitigation. Nothing in the revised analysis would affect the prior cumulative impact analysis and the project's cumulative analysis in Chapter 5, *Cumulative Impacts*, was not a required component of the 2026 Recirculated Draft EIR (refer to MR-16 [Scope of the RDEIR]). No changes to the 2026 Recirculated Draft EIR are needed.

I155-14 The commenter reiterates their opinion about the inadequacy of the noticing process for the 2026 Recirculated Draft EIR. Refer to response I155-3 above.

I155-15 The commenter asserts that the County should recirculate a revised alternatives analysis that considers an alternate project location. This preference is noted, but the 2026 Recirculated Draft EIR was required to address only the issues identified in the Superior Court's June 9, 2025 Minute Order and January 20, 2026 Writ of Mandate, which does not include the project's alternatives analysis, as described in MR-16 (Scope of the RDEIR). Refer to MR-17 (Project Scope and Alternatives) regarding the project's design; an alternate location is not considered feasible. No changes to the 2026 Recirculated Draft EIR are needed.

I155-16 The commenter reiterates their opinion about the inadequacy of the noticing process for the 2026 Recirculated Draft EIR and requests an extended comment period and supplemental notice. Refer to response I155-3 above regarding the adequacy of the noticing conducted for the 2026 Recirculated Draft EIR.

I155-17 The commenter reiterates their opinion about the inadequacy of the noticing process for the 2026 Recirculated Draft EIR. Refer to response I155-3 above.

Comment Letter I156: Chuck Norton, September 14, 2026

Comment Letter I156

From: CHUCK NORTON
To: CEQA_CountyParks
Subject: [External] 2026 Recirculated Draft Environmental Impact Report Alpine County Park--SCH No. 2021030196
Date: Monday, September 14, 2026 2:14:30 PM
Attachments: ceqa-comment-letter CHNorton.pdf

Dear Ms. Doran

I156-1 Please find, attached, my comments to the Recirculated Draft Environmental Impact Report for the Alpine County Park SCH No. 2021030196.

Please confirm receipt of my comments.

Thank you

Charles H Norton MD

September 14, 2026

Megan Doran, Project Planner

County of San Diego, Department of Parks and Recreation

5500 Overland Avenue, Suite 410

San Diego, CA 92123

I. INTRODUCTION AND STANDING

I156-2 I am submitting these comments during the public review period for the Recirculated Draft Environmental Impact Report ("2026 RDEIR") for the Alpine County Park Project, SCH #2021030196, prepared by the County of San Diego Department of Parks and Recreation ("County").

I have a substantial interest in the review of this Project. I have lived in Alpine for over 37 years near the project site, I am invested in my community and have concerns with what is being proposed in the RDEIR.

II. THE RDEIR IMPERMISSIBLY DEFERS MITIGATION FOR THE ACKNOWLEDGED SIGHT DISTANCE DEFICIENCY AT DRIVEWAY #2

A. The RDEIR Acknowledges the Deficiency but Fails to Specify the Required Fix

In new Section 4.17 (Transportation and Circulation), the 2026 RDEIR analyzes sight distance conditions at project driveways and the South Grade Road/Calle de Compadres intersection. The analysis identifies a corner sight distance deficiency at Driveway #2 in the north-east, attributing it to pre-existing vegetation and rock and boulder outcroppings.

Rather than specifying a concrete, enforceable mitigation measure, the RDEIR states only that the deficiency "will be corrected via brush management and grading per standard County site plan review/approval process." This single sentence is the entirety of the proposed mitigation for a known geometric safety hazard at a project entrance on a roadway with a documented fatality history.

I156-3 **B. Deferral to "Standard Site Plan Review" Is Impermissible Under CEQA**

CEQA prohibits lead agencies from deferring the formulation of mitigation measures to a future administrative process without first identifying the specific measures to be implemented and committing to their implementation.

The phrase "per standard County site plan review/approval process" provides no specificity whatsoever. It does not state how much vegetation will be removed, what grade will be achieved, whether grading must occur before construction, who is responsible for implementation, or how completion will be verified and documented in the Mitigation Monitoring and Reporting Program ("MMRP"). A reviewer or member of the public has no way to evaluate whether this vague commitment will actually eliminate the identified deficiency.

The deficiency is not speculative. It is expressly acknowledged in the RDEIR. Deferral is especially problematic here because the project proposes two-way stop control at the South Grade Road/Calle de Compadres intersection. The 2012 driver fatality and 2016 pedestrian collision on South Grade Road underscore the real-world consequences of inadequate sight distance at this location.

III. THE SCIENTIFIC CITATIONS ADDED TO MM-BIO-8 DO NOT CONSTITUTE SUBSTANTIAL EVIDENCE FOR A PALLID BAT-SPECIFIC BUFFER

A. The Court Found the 200-Foot Buffer Lacked Substantiation for Pallid Bat Specifically

The Writ of Mandate found that Mitigation Measure MM-BIO-8's 200-foot avoidance buffer for pallid bat (Antrozous pallidus) maternity roosts lacked scientific substantiation. The 2026 RDEIR responds by adding five scientific citations and underlined explanatory text. However, none of the added citations provide species-specific guidance for pallid bat.

B. The Added Citations Address Different Species in Different Contexts

The five citations added in support of the 200-foot survey buffer are:

- O'Keefe (2009): Documents buffers "as small as 39 feet" that were effective — a statement about the minimum documented effective distance for unspecified bat species in unnamed projects, not a standard applicable to pallid bat.
- I156-4 USFWS (2022): Establishes a 150-foot buffer for the Northern Long-Eared Bat (Myotis septentrionalis), a federally endangered insectivorous bat with roosting ecology markedly different from pallid bat and geographically distributed in the eastern United States and upper Midwest.
- USFS (2024): Establishes a 150-foot buffer for four species — Northern Long-Eared Bat, Indiana Bat, Little Brown Bat, and Tricolored Bat — none of which is the pallid bat.
- Harvey & Associates (2006): Documents that a 100-foot buffer was effective for "active maternity roost[s] of common bat species" at a Santa Clara county park — a different geographic region, different species assemblage, and different site context.
- July 2022 acoustic survey data: Confirms pallid bat presence on the project site but does not establish buffer distance standards.

Pallid bat is a ground-foraging species that hunts large invertebrates on or near the ground surface, roosts in rock crevices and tree cavities, and is adapted to arid scrub habitats of the western United States. Its roosting ecology, sensitivity to disturbance, and maternity roost characteristics are fundamentally different from those of the insectivorous tree-roosting species that are the subjects of the USFWS (2022) and USFS (2024) guidance. An EIR must rely on substantial evidence, that is, evidence adequate to support a conclusion a reasonable person could accept.

IV. THE WESTERN SPADEFOOT TOAD BUFFER ANALYSIS IS INTERNALLY INCONSISTENT WITH THE CITED LITERATURE

A. Halstead et al. (2021) Documents Movements Substantially Exceeding 262 Meters

I156-5 The 2026 RDEIR justifies a 262-meter avoidance buffer for western spadefoot toad (Spea hammondii) by citing two studies: Baumberger et al. (2019), which documented burrow distances ranging from 1 to 262 meters (mean 40 meters) in Orange County; and Halstead et al. (2021), which documented travel distances up to 602 meters in Orange County, with most home ranges less than 1 hectare (approximately 56-meter radius) but 95th-percentile ranges spanning 187 to 486 meters.

The RDEIR's selection of 262 meters as the buffer distance is not adequately explained in light of what those studies actually show. The 262-meter figure represents the observed maximum in the Baumberger (2019) burrow-distance dataset which is the single most extreme observation, not a statistically robust protective

threshold. Halstead et al. (2021) reports 95th-percentile travel ranges extending to 486 meters. The RDEIR cites both studies as support for 262 meters but provides no analysis of why a buffer that protects only the Baumberger maximum, while excluding the upper portion of the Halstead 95th-percentile range, is adequate protection for this population.

I156-5 cont.

B. The RDEIR Fails to Explain Why 262 Meters Protects the Population

CEQA requires that an EIR set forth the "analytical route" from evidence to conclusion.

V. THE BAT ROOST MANAGEMENT PLAN REQUIREMENT CONSTITUTES IMPERMISSIBLE DEFERRAL OF MITIGATION

Revised MM-BIO-8 adds a requirement that a "Bat Roost Management, Monitoring, and Mitigation Plan" be submitted to the County at least 30 days before the start of construction. The RDEIR does not specify: (1) the required contents of this plan; (2) performance standards against which the plan will be evaluated; (3) the approval authority and process; (4) what happens if the plan is not approved; or (5) how the plan's implementation will be monitored and enforced through the MMRP.

I156-6

Mitigation measures cannot defer the substance of mitigation to a future plan.

VI. THE WILDFIRE ANALYSIS DOES NOT ADEQUATELY ADDRESS MASS EVACUATION OF PARK VISITORS VIA SOUTH GRADE ROAD

A. The Court Required Wildfire Analysis; Evacuation Capacity Is a Core Component

The Writ of Mandate found the 2023 FEIR's wildfire analysis inadequate. The 2026 RDEIR responds with new quantitative fire behavior modeling (Appendix J1, Dudek, June 2026) and analyzes four wildfire thresholds. The RDEIR concludes that the project would not significantly impair emergency response or evacuation plans (Threshold 1) because AFPD Station 17 has remaining service capacity to absorb approximately one additional emergency call per day.

However, the RDEIR conflates emergency response capacity (AFPD's ability to respond to calls) with emergency evacuation capacity (the ability of park visitors to safely exit a VHFHSZ site when South Grade Road is potentially blocked by a fast-moving wildfire). These are fundamentally different questions. The 2026 RDEIR does not analyze the second.

I156-7

B. The Project's Evacuation Context Is Uniquely Hazardous

The following facts, acknowledged or implied in the RDEIR, compound the evacuation concern:

- The project proposes a 240-space parking lot, which implies peak occupancy of 500–800 persons or more during sports programming events.
- The site is located in a Very High Fire Hazard Severity Zone (VHFHSZ).
- South Grade Road is the primary access and egress route.
- The 2026 RDEIR acknowledges that the fire behavior modeling shows flame lengths up to 18.1 feet under existing baseline conditions and ember spotting distances up to 1.1 miles. These are conditions that could block or compromise a road corridor.

- The 2023 FEIR's claim that "bike lanes would act as a bypass in an emergency situation" has been deleted from the 2026 RDEIR, leaving no alternative evacuation pathway described. Not to mention there is NO bike lane. Signs were installed that state bikes share the lane with vehicles.

I156-7 cont.

No analysis addresses: whether the South Grade Road corridor has sufficient capacity for simultaneous park-visitor evacuation and incoming emergency vehicles; what evacuation time estimates exist for 500+ visitors using a two-lane road under fire conditions; or what pre-arranged protocols exist between the County Parks Department and AFPD for triggering park evacuation.

VII. THE WILDFIRE ANALYSIS RELIES ON FUEL MANAGEMENT OBLIGATIONS THAT LACK LONG-TERM ENFORCEMENT MECHANISMS

The fire behavior modeling in Appendix J1 is conducted under three conditions, of which Condition 2 "Project with Required Fire Prevention Measures" forms the basis for the RDEIR's less-than-significant finding for Threshold 2. This condition assumes ongoing compliance with all applicable defensible space and fuel modification requirements, including AFPD Zone 0, Zone 1, and Zone 2 clearances throughout the life of the project.

I156-8

The RDEIR does not identify: (1) who is responsible for monitoring and maintaining fuel clearance in the operational phase of the park; (2) whether the County Parks Department has entered into any agreement with AFPD for periodic inspection and enforcement; (3) what happens to the RDEIR's impact conclusions if fuel management lapses; or (4) whether long-term fuel management obligations are captured in any enforceable condition of approval or the MMRP.

This is a known fact. Parks with limited operational budgets routinely struggle to maintain defensible space programs year after year. The RDEIR's impact finding is only as strong as the fuel management commitment behind it.

VIII. PARKING ADEQUACY RESTS PARTLY ON UNENFORCEABLE OPERATIONAL SCHEDULING MEASURES

The 2026 RDEIR concludes that the project's 240-space parking lot is adequate using Hilton Head County Park as a primary demand analog, while also noting that "sports programming scheduling protocols" would be used to stagger peak use and prevent simultaneous overflow.

I156-9

Operational scheduling protocols are not physical design features. Their effectiveness as mitigation depends on consistent enforcement by park operations staff into the indefinite future. The RDEIR does not commit to any specific scheduling protocol, does not identify who is responsible for enforcing it, and does not specify consequences for non-compliance. Under CEQA's requirements for enforceable mitigation, a vague operational practice that could be abandoned at any time without triggering any review is not adequate.

IX. REQUESTS

I respectfully request that the County, before recertifying the EIR and re-approving the project, take the following actions:

I156-10

1. Revise Section 4.17 and the MMRP to specify concrete, enforceable mitigation for the Driveway #2 sight distance deficiency, including exact grading dimensions, vegetation removal scope, the party responsible for implementation, and the timeline for completion before park opening.

I156-10 cont.

2. Provide species-specific peer-reviewed scientific literature or analysis supporting the 200-foot pallid bat buffer in MM-BIO-8, or revise the buffer to reflect a scientifically substantiated standard for pallid bats specifically.
3. Revise the western spadefoot toad buffer analysis to provide an internally consistent explanation for the selection of 262 meters in light of the full range of movement data reported in Halstead et al. (2021), including movements documented up to 486 meters at the 95th percentile.
4. Revise MM-BIO-8 to specify the required contents, performance standards, and approval process for the Bat Roost Management, Monitoring, and Mitigation Plan, eliminating the current impermissible deferral.
5. Augment the Section 4.20 wildfire analysis to specifically address emergency evacuation capacity for park visitors at peak occupancy via South Grade Road, including road capacity analysis and pre-arranged AFPD evacuation protocols.
6. Include in the MMRP an enforceable long-term fuel management obligation with identified responsible party, inspection frequency, performance standards, and enforcement consequences.
7. Either commit to specific, enforceable sports programming scheduling protocols as a condition of approval or remove any reliance on such protocols in the parking adequacy analysis.
8. Recirculate the revised EIR sections for additional public review to the extent that the revisions constitute significant new information under CEQA.

Respectfully submitted,

Dr. Charles H. Norton
2457 Avenida Canora, Alpine, CA 91901
619-445-5048, chnorton@cox.net

Comment Letter I156 Response: Comments I156-1 through I156-10

I156-1 This comment introduces the letter submitted by the commenter. Refer to responses I156-2 through I156-10 below.

I156-2 This is an introductory comment that expresses general concerns associated with the project and describes the commenter's relationship with the community but does not address the adequacy of the environmental analysis in the 2026 Recirculated Draft EIR. Refer to specific comments on the 2026 Recirculated Draft EIR below.

I156-3 The commenter asserts that the County's site plan review/approval process is a deficient means of addressing the sight distance issue at Driveway #2. Refer to MR-25 (Driveway #2 Sight Distance) regarding implementation of Driveway #2 sight distance requirements. No changes to the 2026 Recirculated Draft EIR are needed.

I156-4 The commenter asserts that the interspecies comparisons for pallid bat are not substantial evidence for the proposed buffers in MM-BIO-8. Refer to MR-27 (Pallid Bat MM-BIO-8) for an explanation of the interspecies comparison. No changes to the 2026 Recirculated Draft EIR are needed.

I156-5 The commenter asserts that the EIR does not provide sufficient explanation of the 262-meter buffer around western spadefoot breeding pools. Refer to MR-26 (Western Spadefoot Buffer); the proposed 262-meter buffer is sufficient. No changes to the 2026 Recirculated Draft EIR are needed.

I156-6 The commenter asserts that the Bat Roost Management Plan requirement constitutes impermissible deferral of mitigation. Refer to MR-27 (Pallid Bat MM-BIO-8); the Bat Roost Management, Monitoring, and Mitigation Plan is not deferred mitigation. Additionally, this portion of MM-BIO-8 has not been changed since the 2023 FEIR. No changes to the 2026 Recirculated Draft EIR are needed.

I156-7 The commenter asserts that emergency evacuation is inadequately addressed in the project's wildfire analysis. Refer to MR-18 (Emergency Evacuation) regarding project impacts to emergency response and evacuation, which were not required to be analyzed in the 2026 Recirculated Draft EIR. The revised analysis in the 2026 Recirculated Draft EIR conducts fire behavior modeling and ignition risk research to compare fire risk in the existing condition and fire risk with the project; the revised analysis does not affect the project's evacuation and emergency response conclusions in Sections 4.9.4 and 4.20.6 of Volume 2, as discussed further in MR-18 (Emergency Evacuation). Please also refer to MR-9 (Wildfire) in Volume 4 Chapter 3, *Response to Comments on the Draft EIR And Recirculated Draft EIR* for additional information on emergency evacuation. No changes to the 2026 Recirculated Draft EIR are needed.

I156-8 The commenter questions the enforceability of the project's fuel management obligations. Brush management obligations would be incorporated into ongoing park operations and maintenance carried out by DPR staff assigned specifically to this facility. In compliance with DPR's Maintenance Assessment Program, DPR staff from other facilities would also routinely inspect vegetation and defensible-space conditions to

ensure adequate maintenance is being completed. If it is not, they will recommend completing additional brush clearing, trimming, and vegetation management as needed to maintain required fire-safety standards. This program serves as secondary oversight to ensure site-specific staff adequately maintain the facility. In addition, the Alpine Fire District regularly inspects the project site and provides direction if additional maintenance is needed. This ongoing inspection and maintenance responsibility would ensure brush management requirements continue to be met throughout operation of the park. The project's fuel modification fire prevention measures would be implemented, and no changes to the 2026 Recirculated Draft EIR are needed.

I156-9 The commenter asserts that the project's sports programming is vague and unenforceable. Refer to MR-28 (Sports Programming Protocol); the project's parking management program is enforceable and not required to conclude a less than significant impact to pedestrian and bicyclist safety, and no changes to the 2026 Recirculated Draft EIR are needed.

I156-10 This comment reiterates the requests made in the comments above. Refer to responses I156-1 through I156-9 above. No changes to the 2026 Recirculated Draft EIR are needed.

Comment Letter I157: Courtney Norton, September 14, 2026

Comment Letter I157

From: Courtney Norton
To: CEQA, CountyParks
Subject: [External] Alpine County Park Project — SCH No. 2021030196
Date: Monday, September 14, 2026 12:59:44 PM
Attachments: AlpineCountyPark_RDEIR_2026_CNorton.pdf

Good afternoon Ms. Doran,

I157-1 Please confirm receipt of my attached letter for comments on the 2026 Recirculated Draft EIR — Alpine County Park Project (SCH No. 2021030196).

Thank you,

Courtney Norton
courtney.norton88@gmail.com

September 14, 2026

Megan Doran, Project Manager
County of San Diego, Department of Parks and Recreation
5510 Overland Avenue, Suite 270
San Diego, CA 92123

Email: CountyParksCEQA@sdcounty.ca.gov

RE: Comments on the 2026 Recirculated Draft EIR — Alpine County Park Project (SCH No. 2021030196) — Biological Resources (Section 4.4 and Appendix D2)

Dear Ms. Doran:

I157-2 I have lived in Alpine, California, since I was a young child. I have actively participated in every opportunity the public has been offered as it relates to the Alpine County Park Project. This comment letter is for the 2026 Recirculated Draft EIR Biological Resources Section and supporting appendix D2.

I. BIOLOGICAL RESOURCES — WESTERN SPADEFOOT (Section 4.4; Appendix D2)

A. The Court's Mandate

I157-3 The Superior Court held that the original EIR's 262-meter avoidance buffer for the western spadefoot (*Spea hammondii*) was not supported by substantial evidence because the analysis failed to grapple with: (1) the USGS-recommended buffer of 300–400 meters for a comparable San Diego County spadefoot population; and (2) Halstead et al. (2021), which documented an individual spadefoot traveling 602 meters and found a 486-meter 95th-percentile dispersal distance. The court did not tell the County which buffer to adopt, it told the County to explain, with reasoning that confronts this contrary evidence, why 262 meters is adequate.

B. What Appendix D2 Actually Does

Rather than engaging with the maximum-dispersal metric the court identified, Appendix D2 pivots to a home-range framework. It converts Halstead's observation that most individual home ranges are under one hectare into a circular geometry, back-calculates a 56-meter radius, and concludes that the existing 262-meter buffer "provides far more habitat than even the largest individual home range observed" (6 hectares, equating to approximately 138 meters). This reframing allows the County to declare the buffer adequate without explaining why a 602-meter travel distance or a 486-meter 95th-percentile dispersal distance does not necessitate a larger buffer.

C. Continued CEQA Deficiencies

I157-4 1. The home-range conversion is not drawn from Halstead et al., it is the County's own construct. Halstead et al. does not assert that a circular home-range radius is the appropriate metric for buffer sizing, nor that breeding-pond buffers should be scaled to home-range area rather than maximum travel distance. Using a novel analytical framework invented specifically to justify an existing buffer conclusion is not the "reasoned analysis" CEQA demands. CEQA requires that an agency confront contrary expert opinion directly and explain why it is unpersuasive on the evidence, not reformulate the question so that the contrary evidence becomes irrelevant.

I157-5 2. The 602-meter movement was not random dispersal, it documented site fidelity, which the County's "home range" reframing ignores. Appendix D2 characterizes the 602-meter individual from Halstead et al. as an "outlier" whose movement is not "correlated with where [spadefoot] spend most of their time." This characterization is scientifically inaccurate and is directly contradicted by the study's own co-authors. Site fidelity at 600 meters is directly relevant to buffer sizing: if animals are navigating toward specific pools from over 600 meters away, the upland corridor that enables that movement requires protection to that distance. Appendix D2 never acknowledges the site-fidelity interpretation of this data point, let alone explains why it is incorrect.

I157-6 3. The 486-meter 95th-percentile figure and the 602-meter maximum are still not addressed on their own terms. Appendix D2 acknowledges these numbers but dismisses them as not reflective of "where [spadefoot] spend most of their time." That observation, whether or not ecologically true, is a non-answer to the court's instruction. The petitioners' experts cited those figures as evidence of the maximum potential movement requiring protection, not as evidence of average daily range. The court agreed that the EIR needed to explain why protection for maximum recorded movement is unnecessary. The 2026 analysis still does not do that.

I157-7 4. The southern clade population at this site is among the most genetically vulnerable of the species, making upland connectivity loss disproportionately harmful. Published genomic research on *Spea hammondii* establishes that southern clade populations, which include the San Diego County populations associated with this project site, have dangerously low effective population sizes. Neal et al. (2020), "Conservation Genomics of the Threatened Western Spadefoot, *Spea hammondii*, in Urbanized Southern California," *Journal of Heredity* 111:613-627, documents Orange County southern clade populations with a population size estimate of 1.2 to 12.2 and effective breeding sizes of 1.4 to 19.8, well below both the traditional 50/500 minimum viability threshold and the newer 100/1000 standard. CDFW's January 2026 “Petition Evaluation for Western Spadefoot – Report to the Fish and Game Commission” relied on these published figures in concluding that southern clade populations are at acute risk. Appendix D2 conducts no population genetics assessment, cites none of this peer-reviewed genomic literature, and makes no attempt to evaluate whether the proposed 262-meter buffer preserves the connectivity that southern clade populations require for genetic diversity.

The western spadefoot is listed at Near Threatened on the International Union for Conservation of Nature (IUCN) Red List, meaning the species is likely in significant decline due to widespread habitat loss throughout its range. The development of this park would cause habitat loss of high-quality grassland, the habitat spadefoot rely on.

The native grasslands at this site are not incidental to the western spadefoot's persistence; they are the habitat on which the species depends for the overwhelming majority of its life cycle. Western spadefoot are explosive breeders that occupy seasonal pools only briefly following winter and spring rains. For the remainder of the year, individuals are underground in upland soils, in self-excavated burrows or in burrows created by other animals. That aestivation habitat must be friable enough to excavate, must retain sufficient soil moisture to prevent desiccation, and must support the invertebrate prey base on which post-emergence foraging and pre-breeding body condition depend. Native grassland with intact soil structure, native bunchgrass and forb cover, and an unfragmented surface provides those conditions; graded, compacted, irrigated, or landscaped surfaces do not.

I157-7 cont.

Two consequences follow for the adequacy of the 262-meter buffer. First, the functional habitat unit for this species is the breeding pool plus the surrounding native grassland matrix, and impacts to that matrix are impacts to the species regardless of whether the breeding pool itself is physically disturbed. Loss or conversion of native grassland within the documented dispersal envelope removes the aestivation and foraging habitat that makes the breeding pool usable at all. Second, the native grassland is what makes the documented 602-meter movement and 486-meter undeth-percentile dispersal distance biologically possible; permeable upland grassland is the medium through which spadefoot move between pools, exhibit the site-fidelity behavior documented by Halstead et al., and recolonize following local breeding failures. Park development including grading, turf and landscaping conversion, hardscape, lighting, and intensified recreational use converts precisely this substrate. Appendix D2 does not quantify the acreage of native grassland to be lost or converted, does not evaluate the aestivation and foraging function of the grassland within the buffer and the surrounding dispersal envelope, and does not explain how a species that spends most of its life in upland grassland soils is adequately protected by a buffer calibrated to home-range geometry rather than to the extent and condition of the grassland on which it depends.

5. Based on the 2023 federal Threatened listing and the September 2025 CESA recommendation, it is clear that the state and federal governments' own scientific conclusion that this species' peril is severe. In November 2023, USFWS listed both the Northern and Southern Distinct Population Segments of the western spadefoot as Threatened under the federal Endangered Species Act. The Southern Distinct Population Segment encompasses San Diego County populations, including the population associated with the Alpine Park project site. Then, in October 2026, eight months before this Recirculated Draft EIR was publicly circulated, the Fish and Game Commission accept the petition for further consideration. CDFW's petition evaluation states "the Department determined there is sufficient information to indicate that the petitioned action may be

I157-8

I157-8 cont.

warranted". That finding was premised on documented population declines, loss of approximately 80 percent of suitable southern California habitat, and critically low effective population sizes in southern clade populations, all directly relevant to the Alpine project site. The 2026 Recirculated Draft EIR does not cite the CDFW Petition Evaluation, does not explain how the 262-meter buffer is consistent with CDFW's own conclusion that the species' southern populations may be imperiled enough to warrant CESA listing, and does not integrate either regulatory action into its significance determination. A species that two independent government agencies, both USFWS and CDFW, have found to be threatened or potentially warranting listing as endangered demands analysis that confronts, not ignores, those conclusions.

I157-9

6. Federal agency concurrence does not substitute for CEQA's independent evidentiary requirement. Appendix D2 relies significantly on USFWS concurrence and the Section 7 Biological Opinion. ESA "jeopardy" analysis applies a different legal standard and different administrative record than CEQA's "significant impact" standard. The Superior Court evaluated a CEQA claim; USFWS evaluated an ESA claim. The County cannot discharge its CEQA obligation by pointing to a federal agency that applied a different statute to different factual submissions. Notably, the USFWS 2023 Threatened listing itself post-dates the prior EIR rounds and constitutes new information that the 2026 recirculation is obligated to incorporate into its analysis.

I157-10

7. The County's own history of finding the buffer inadequate is unaddressed. The 300–400 meter USGS recommendation was raised as inadequate in the 2021 comment period and again in the 2023 recirculation. Each time, the County has declined to adopt the recommended buffer and each time the EIR's analysis has been found insufficient. The 2026 Appendix D2 does not explain why the site cannot accommodate a more protective buffer despite having Wright's Field Ecological Preserve immediately to the west, or why two prior rounds of scrutiny have not yielded a more robust site-specific dispersal study.

I157-11

Request: The County should either: (a) commission or cite a site-specific telemetry or habitat-connectivity study to account for site-specific conditions, population genetics, the documented site-fidelity behavior of the Halstead 602-meter individual; or (b) adopt the more protective end of the recommended buffer range and explain what project modifications, if any, that necessitates. The County should also quantify the acreage of native grassland that would be lost, graded, or converted by the project, and analyze that loss as an impact to western spadefoot aestivation and foraging habitat rather than solely as a vegetation-community impact. The County must also explain, in light of the 2023 USFWS federal Threatened listing and the January 2026 Petition Evaluation recommending CESA consideration, how a 262-meter buffer constitutes an adequate CEQA response for a species that state and federal wildlife agencies have independently identified as potentially warranting listing as Threatened or Endangered. The CDFW Petition Evaluation which was published before this Recirculated Draft EIR was circulated, constitutes best available scientific information that the County is required to consider. Neither option has been taken in three rounds of EIR review.

II. BIOLOGICAL RESOURCES — Quino Checkerspot Butterfly — CESA Candidate Status Not Addressed

The Quino checkerspot butterfly (*Euphydryas editha quino*) was petitioned as a California Endangered Species Act (CESA) candidate species on August 20, 2025, eleven months before this Recirculated Draft EIR was circulated on July 31, 2026. The species has been federally listed as Endangered under the federal ESA since 2002. The Fish and Game Commission's candidacy finding, based on a CDFW Petition Evaluation completed in February 2025, determined that "sufficient scientific information" exists to indicate that CESA listing of the Quino checkerspot as endangered may be warranted.

The Quino checkerspot historically occurred throughout the foothills east of San Diego, including the elevational zones and grassland/chaparral habitats characteristic of the Alpine project site. The species' ongoing decline across its southern California range and the Fish and Game Commission's August 2025 candidacy finding constitute "new information" within the meaning of CEQA. A candidate species receives the full take prohibitions of CESA, including the prohibition on take without an incidental take permit. I157-12

Deficiency: Neither Section 4.4 nor Appendix D2 of the 2026 Recirculated Draft EIR addresses the Quino checkerspot's CESA candidate status, which was established before the RDEIR's public release. The EIR does not: (a) confirm whether surveys adequate to detect Quino checkerspot were conducted at the project site and adjacent areas; (b) assess whether any detected or potentially occurring Quino population would be subject to take under CESA as a candidate species; or (c) evaluate whether additional mitigation is necessary in light of the CESA candidacy.

Request: The County should supplement the biological resources analysis to: (a) disclose the results of any Quino checkerspot surveys conducted at or adjacent to the project site, with survey dates, methods, and qualified surveyor credentials; (b) if the species is absent, explain why site conditions are unsuitable during the appropriate survey season; and (c) if the species is present or potentially present, analyze potential take and required mitigation under CESA's candidate species protections.

III. BIOLOGICAL RESOURCES — PALLID BAT (Section 4.4; Appendix D2; MM-BIO-8)

A. The Court's Mandate

The court found that MM-BIO-8's 200-foot avoidance buffer for pallid bat (*Antrozous pallidus*) roost sites was not supported by substantial evidence because the County's own retained expert had recommended a minimum 500-foot buffer during the pupping season, and the EIR never explained why it adopted 200 feet instead. I157-13

B. What Appendix D2 Does

The addendum surveys buffer standards used by other agencies for other bat species: 150 feet (USFWS/USFS for northern long-eared bat), 250 feet (USFS in Pacific Northwest timber harvest contexts), 100 feet (Caltrans generalized guidance for big brown bat), and various activity-specific Caltrans buffers ranging from 65 feet (pedestrian) to 400 feet (unshielded light). The addendum also notes that the revised MM-BIO-8 allows a qualified bat biologist to expand the buffer beyond 200 feet if warranted, and references a forthcoming Bat Roost Management, Monitoring, and Mitigation Plan.

C. Continued CEQA Deficiencies

1. The County's own expert's 500-foot recommendation is still not addressed. The County has contrary evidence in its own record, provided by its own expert, recommending a larger buffer, and the EIR provided no explanation for rejecting it. The 2026 Appendix D2 does not contain that explanation. Citing external agency standards for different species in different geographic and project contexts does not explain why the County rejected the recommendation of the expert it selected and paid to advise it on this species at this site.

I157-13 cont.

2. Internal inconsistency between the survey buffer and protection commitments. Appendix D2 acknowledges that the project "will comply with" Caltrans buffers of up to 400 feet for unshielded light and 250 feet for stationary exhaust sources, both of which exceed the 200-foot survey trigger in MM-BIO-8. A roost located at 225 feet would be within the zone requiring light and exhaust protection, but outside the 200-foot zone that triggers survey work to identify it in the first place. The EIR cannot plausibly claim that impact on a roost has been mitigated if the survey methodology would not find the roost before construction or operation begins.

3. Comparison-species studies do not constitute substantial evidence specific to this site. Appendix D2 itself concedes that "none [of the comparison species] is a perfect comparison." CEQA's substantial evidence standard requires site-specific and species-specific evidentiary support for significance determinations. Generalizing from northern long-eared bat or big brown bat buffer standards to pallid bat at this location does not satisfy that standard.

4. Deferred mitigation without defined performance criteria. MM-BIO-8's reference to a forthcoming Bat Roost Management, Monitoring, and Mitigation Plan defers a central mitigation specificity question without providing the performance criteria, monitoring triggers, or threshold conditions the plan must achieve. MM-BIO-8 as revised does not establish specific performance criteria by which the adequacy of the eventual mitigation can be evaluated, thus this is differed mitigation which is not allowed under CEQA.

Request: The County should: (a) specifically address why its own retained expert's 500-foot pupping-season recommendation was rejected, citing evidence specific to pallid bat at this site; (b) reconcile the 200-foot survey buffer with the up-to-400-foot protective buffer commitments by enlarging the survey trigger to encompass the full protection zone; and (c) include in the EIR

I157-13 cont. either the completed Bat Roost Plan or, at minimum, specific, measurable performance criteria to which that plan must conform.

V. CONCLUSION

I157-14 The 2026 Recirculated Draft EIR produces more analysis, some of it genuinely improved, but on close reading, does not fully address ongoing issues. The western spadefoot home-range reframing sidesteps the dispersal-distance question. The bat-buffer analysis ignores the County's own expert. The stakes for the spadefoot analysis have also materially increased since the prior EIR rounds. The USFWS listed the Southern Distinct Population Segment of the western spadefoot as Threatened under the federal ESA, the first federal listing for any population of this species. The Center for Biological Diversity formally recommended the Fish and Game Commission accept a petition to list the species under CESA as well, finding the listing may be warranted based on documented loss of approximately 80 percent of suitable southern California habitat, the grassland which will be destroyed if this park is built, and critically low effective population sizes in southern clade populations. The 2026 Recirculated Draft EIR, released after both of these regulatory actions, neither cites the CDFW Petition Evaluation nor explains how a 262-meter buffer is consistent with the regulatory conclusions of the two agencies with greatest expertise on this species. Additionally, the Quino checkerspot butterfly, a federally Endangered species that historically occurred in the Alpine area, was declared a CESA candidate as of August 2025, and the EIR does not address that candidacy status at all. In addition, specific deferred mitigation continues to be included in the recirculated DEIR (including MM-BIO-8).

Thank you for the opportunity to review the RDEIR and I look forward to receiving a revised version that addresses these ongoing concerns with the proposed project.

Thank you,
Courtney Norton
1457 Louise Drive
Alpine, CA 91901
Courtney.norton88@gmail.com

Comment Letter I157 Response: Comments I157-1 through I157-14

I157-1 This comment introduces the letter submitted by the commenter. Refer to responses I157-2 through I157-14 below.

I157-2 This is an introductory comment that describes the commenter's relationship with the community but does not address the adequacy of the environmental analysis in the 2026 Recirculated Draft EIR. Refer to specific comments on the 2026 Recirculated Draft EIR below.

I157-3 The commenter asserts that the EIR and Appendix D2 do not sufficiently refute the 486-meter 95th-percentile buffer or 602-meter maximum for western spadefoot breeding pools and travel. Refer to MR-26 (Western Spadefoot Buffer); the proposed 262-meter buffer is sufficient for the project. The specific points raised by the commenter related to this issue are described in more detail in responses I157-4 through I157-10 below.

I157-4 The commenter asserts that a circular home-range conversion is inadequate. A circular home range conversion is adequate because it gives biologists a good idea of where the spadefoot would most likely occur based on studies of distances western spadefoot regularly travels from breeding ponds. The circle is centered on the breeding pool. While home ranges are unlikely to be perfect circles in reality, it is common practice to create circular buffers while protecting plants and animals during construction (i.e. buffers around active bird nests or construction fencing around oak tree drip lines.) As described in MR-26 (Western Spadefoot Buffer), a buffer based on the typical western spadefoot home range is an adequate buffer due to the proximity of adjacent suitable habitat and Wright's Field Preserve. No changes to the 2026 Recirculated Draft EIR are needed.

I157-5 The commenter asserts that the 602-meter individual from Halstead et al. demonstrates that County's buffer is inadequate. However, as described in MR-26 (Western Spadefoot Buffer), a buffer based on the typical western spadefoot home range is an adequate buffer due to the proximity of adjacent suitable habitat and Wright's Field Preserve. No changes to the 2026 Recirculated Draft EIR are needed.

I157-6 The commenter asserts that Appendix D2 fails to address the petitioners' evidence of the maximum potential movement requiring protection. MR-26 (Western Spadefoot Buffer) explains why the 486-meter and 602-meter buffers are not necessary: there is suitable habitat and Wright's Field Preserve adjacent to the project site, and a 262-meter buffer would provide a safe path of travel between the breeding pools and suitable upland habitat. No changes to the 2026 Recirculated Draft EIR are needed.

I157-7 The commenter asserts that Appendix D2 doesn't consider if the proposed 262-meter buffer adequately protects the genetic diversity of the southern clade population and states that impacts to native grassland constitute impacts to western spadefoot. Genetics studies are outside of the scope of a biological technical report. Impacts to native grassland are being mitigated on site at a 2:1 ratio through MM-BIO-9, and the on-site mitigation will provide additional habitat for western spadefoot. As described in MR-26 (Western Spadefoot Buffer), the proposed western spadefoot buffers would

provide connectivity to adjacent suitable habitat and Wright's Field Preserve. No changes to the 2026 Recirculated Draft EIR are needed.

I157-8 The commenter asserts that Appendix D2 doesn't consider the CDFW petition evaluation and reiterates the sensitivity of the southern clade population. Appendix D2 was completed on July 8, 2026. CDFW listed western spadefoot as a candidate endangered species on August 12-13, 2026. Therefore, the species had not been listed by CDFW at the time the document was written, but the FEIR does not discuss the CESA status of individual species. Rather, any species 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), the California Endangered Species Act (CESA), or the County's Sensitive Plant List and Sensitive Animal List have been included in the FEIR as a special status species as they are afforded protections. Section 4.4.4.3 of Volume 2 already identifies western spadefoot as a special-status species and the FEIR. Additionally, the 2026 Recirculated Draft EIR agrees with the CDFW Petition regarding the sensitivity of the western spadefoot and includes mitigation to compensate for potential impacts to the species. As described in MR-26 (Western Spadefoot Buffer), the proposed western spadefoot buffers would provide adequate protection for the species by enabling connectivity to adjacent suitable habitat and Wright's Field Preserve. No changes to the 2026 Recirculated Draft EIR are needed.

I157-9 The commenter asserts that federal agency concurrence is separate from CEQA and that the USFWS 2023 threatened listing constitutes new information that the 2026 Recirculated Draft EIR must incorporate. However, the County anticipated the listing and preemptively sought coverage under an ITP, and the ITP was issued after the listing, in December 2025. The FEIR acknowledges the sensitivity of western spadefoot, consistent with the USFWS Threatened listing, and includes appropriate CEQA mitigation to compensate for potential impacts to the species. Volume 2 Chapter 1, *Introduction* of the Final EIR has been revised to clarify that the project would require an ITP for western spadefoot.

I157-10 The commenter asserts that Appendix D2 does not explain why the site cannot accommodate the 300-400 meter USGS buffer recommendation. Refer to MR-17 (Project Scope and Alternatives) regarding the project's size and design. As described in MR-26 (Western Spadefoot Buffer), the proposed 262-meter western spadefoot buffer would provide adequate protection for the species by enabling connectivity to adjacent suitable habitat and Wright's Field Preserve. The 300-400 meter buffer is not necessary to protect western spadefoot and is not compatible with the project's design. No changes to the 2026 Recirculated Draft EIR are needed.

I157-11 This comment reiterates the concerns raised in comments I157-3 through I157-10 above and requests additional analysis to support the County's 262-meter buffer. Refer to responses I157-3 through I157-10 above; the project considers the western spadefoot a sensitive species requiring protection and proposes a 262-meter buffer from breeding pools, which would provide adequate connectivity to adjacent suitable habitat, ensuring the long-term protection of the local western spadefoot population.

I157-12 The commenter asserts that the EIR should be revised to specify the CESA status of Quino checkerspot butterfly and discuss the results of surveys conducted for the species. The County is currently working with CDFW to pursue an ITP for Quino checkerspot butterfly. The FEIR does not discuss the CESA status of individual species. Rather, any species 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), the California Endangered Species Act (CESA), or the County's Sensitive Plant List and Sensitive Animal List have been included in the FEIR as a special status species as they are afforded full protections. Section 4.4.2.4 of Volume 2 correctly identifies Quino checkerspot butterfly as a special-status species. Section 4.4.2 describes the surveys that were conducted for the project, including Quino checkerspot butterfly surveys in 2019 and 2020. A supplemental description of the Quino checkerspot butterfly's CESA status is not necessary, as the project already includes protections for Quino checkerspot butterfly as a special-status species. Chapter 1, *Introduction* of the Final EIR has been revised to clarify that the project would require an ITP for Quino checkerspot butterfly.

I157-13 The commenter asserts that the pallid bat survey and construction avoidance buffers conflict with one another; questions the use of interspecies comparisons to determine the survey buffer; and claims the Bat Roost Management, Monitoring, and Mitigation Plan constitutes deferred mitigation. Refer to Master Response MR-27 (Pallid Bat MM-BIO-8) regarding the adequacy of this mitigation measure. MM-BIO-8 has been revised to expand the survey buffer to include the entirety of the project construction footprint as well as 400 feet beyond the project construction footprint to ensure that any roost requiring a buffer greater than 200 feet (ex: for stationary sources or lighting without shields) would be identified during preconstruction surveys and appropriate buffers would be implemented.

I157-14 This comment reiterates the concerns raised in the preceding comments. Refer to responses I157-1 through I157-13 above.

Comment Letter I158: Dominique Norton, September 14, 2026

Comment Letter I158

From: Dominique Norton
To: CEQA, CountyParks
Cc: Duncan McFetridge; Joseph D. Petta
Subject: [External] Alpine Park Project (SCH No. 2021030196) - 2026 RDEIR Comment Letter
Date: Monday, September 14, 2026 11:12:45 AM
Attachments: Sept2026AlpineCountyParkCommentLetter_DNorton.pdf

Hello,

I158-1 Please find attached my comment letter to address ongoing issues the 2026 RDEIR for the Alpine Park Project (SCH No. 2021030196).

Please reply to confirm receipt of this email and the attached comment letter (PDF).

Thank you,
Dominique Norton

September 14, 2026

Megan Doran, Project Manager
County of San Diego, Department of Parks and Recreation
5510 Overland Avenue, Suite 270
San Diego, CA 92123

RE: Comments on the 2026 Recirculated Draft EIR — Alpine County Park Project (SCH No. 2021030196) —Wildfire (Section 4.20 and Appendix J1) and Transportation/Safe Access (Section 4.17 and Appendix I1)

Dear Ms. Doran:

I am a resident of Alpine, California, I have followed the Alpine County Park Project closely through multiple rounds of environmental review and have submitted comments at every opportunity. The comments included in this letter are directed specifically to the 2026 Recirculated Draft EIR Wildfire, Hazards Section, and Transportation and Safe Access sections and the supporting appendices I1, and J1.

I158-2 This 2026 recirculation exists because the San Diego Superior Court found the prior EIR deficient on four specific grounds — inadequate analysis of impacts to the western spadefoot toad and pallid bat, inadequate baseline wildfire analysis before mitigation, and failure to analyze traffic safety design hazards at the project driveways.

I write to explain why, on close reading of the recirculated materials, the analysis remains deficient on each of these counts. The 2026 Recirculated Draft EIR still fails to address the deficiencies the Superior Court identified.

I. WILDFIRE (Section 4.20; Hazards Section 4.9, Threshold 7; Appendix J1)

A. The Court's Mandate

I158-3 The court held that the EIR's wildfire analysis was deficient because it failed to: (1) separately analyze the significance of fire risk under existing/baseline conditions before layering in mitigation; and (2) explain the methodology behind the effectiveness claims for proposed measures.

B. What the Revised Sections Do

The 2026 recirculation presents fire-behavior modeling in Appendix J1 across three scenarios: (1) existing/baseline conditions, (2) project with code-required fire prevention measures only, and (3) project with the County's additional voluntary measures. Specific flame length, fireline intensity,

spread rate, and ember-spotting data are provided for each scenario. This is a substantive improvement over previous drafts.

C. Continued CEQA Deficiency

The modeled existing-conditions data is sobering: under offshore Santa Ana wind conditions, the site experiences flame lengths up to 18.1 feet, spread rates of 6.2 mph, and ember spotting of up to 1.1 miles. These are objective fire-behavior metrics for a site within a Very High Fire Hazard Severity Zone adjacent to residential neighborhoods in a community historically threatened by wildfire.

I158-3 cont.

The court's instruction was to separately analyze existing conditions and produce a significance determination for that baseline before proceeding to the mitigated analysis. The 2026 sections describe existing conditions in detail, then move directly to the "project with required measures" analysis, which is found less-than-significant. Nowhere does Section 4.20 or Section 4.9 state: "Under existing conditions, without any project and without any mitigation, fire risk at this site constitutes a [significant / less-than-significant] impact." The analysis has more data but the same structural gap the court identified, it folds baseline conditions into the mitigated analysis rather than first rendering an independent significance conclusion for the baseline.

A second structural concern: compliance with baseline regulatory requirements is not project-specific mitigation. Section 4.20 and Appendix J1 treat code-required fire-safe construction standards, defensible-space requirements, and Cal Fire Title 19 defensible-space dimensions as "required measures" that move the project from a potentially significant impact to less-than-significant. Compliance with generally applicable laws and regulations is part of the baseline, not a project-specific mitigation measure that can reduce an otherwise-significant impact to less-than-significant.

I158-4

A third structural concern: the County's evacuation-sequencing assumption is an operational assertion offered in place of analysis. At the September 3, 2026 Alpine Community Planning Group meeting, County Parks and Recreation staff explained that when the County becomes aware of a fire within the county that would pose a risk to a particular park, staff begin evacuating park visitors, and that park visitors will therefore not contribute to traffic congestion during a fire event because they will have been evacuated before residents. That assumption performs substantial analytical work. It removes hundreds of vehicles from the evacuation scenario by assertion rather than by modeling, and it is the reason the RDEIR never confronts South Grade Road's carrying capacity under combined park-and-resident evacuation load. Nothing in Section 4.20, Section 4.9, or Appendix J1 establishes the factual predicates on which the assumption depends.

For park visitors to clear the site before residents evacuate, each of the following must hold, and none is documented in the record: (a) County Parks must receive notice of an approaching fire before the surrounding community does, yet no dispatch protocol, interagency notification

agreement, or memorandum of understanding with CAL FIRE or the Sheriff's Department is identified, and residents who observe smoke, monitor scanners, or receive the same public alert routinely self-evacuate before any official order issues; (b) sufficient staff must be present at the moment of ignition, yet the RDEIR relies on the same volunteer and ranger staffing model that Appendix I1 already treats as the mechanism for managing parking overflow, and peak fire-weather days are also peak visitation days; (c) the time required to sweep trails and open space, clear a 240-space parking lot, queue vehicles, and discharge them onto South Grade Road must be quantified, yet no clearance-time estimate appears anywhere in the RDEIR; (d) the entrance must be closed and inbound visitors turned back, yet no closure trigger or access-control measure is described; and (e) most fundamentally, even a successful early departure places park traffic onto the same single corridor residents will use minutes later or concurrently. Sequencing the order of departure does not de-conflict the roadway. It changes when park vehicles enter South Grade Road, not whether they occupy it during the evacuation window.

I158-4 cont.

This matters because the assumption is doing the work of a significance determination. An unwritten operational practice with no timing trigger, no clearance-time estimate, no staffing commitment, no verification mechanism, and no backstop if it fails is not mitigation that is "fully enforceable through permit conditions, agreements, or other measures," and an evacuation assumption that removes park-generated vehicles from the analysis by fiat is not substantial evidence. On a site modeled at flame lengths up to 18.1 feet, spread rates of 6.2 mph, and ember spotting up to 1.1 miles under Santa Ana conditions, the adequacy of egress is precisely the question the wildfire analysis must answer rather than assume away.

Request: The County should: (a) include an express significance finding for fire risk under baseline/existing conditions, standing alone and without reference to project mitigation; and (b) clarify whether code-required fire-safe standards are being treated as baseline conditions or as project-specific mitigation measures, and explain the legal basis for that treatment; and (c) either substantiate or withdraw the assumption that park visitors will be evacuated in advance of residents, by (i) documenting the notification protocol and any interagency agreement on which advance notice depends, (ii) providing a quantified park clearance-time estimate under peak-visitation, peak-fire-weather conditions, (iii) modeling South Grade Road's capacity under the combined park-and-resident evacuation load rather than assuming the two flows do not overlap, and (iv) if the protocol is relied upon to reduce impacts, adopting it as a mitigation measure with a defined activation trigger, a minimum staffing commitment, and a verification mechanism, so that it is fully enforceable.

I158-5

II. TRANSPORTATION AND SAFE ACCESS (Section 4.17; Appendix I1)

I158-6

A. The Court's Mandate

The court found the EIR deficient for failing to analyze whether the project increases traffic hazards through a geometric design feature, specifically, the project driveways on South Grade Road, and

directed analysis of traffic control device choice, sight distance, and impacts on vehicles, pedestrians, and cyclists. The court specifically found that this analysis should not be delayed.

I158-6 cont.

B. What Appendix I1 Does

The addendum provides a five-year crash history review (plus two older fatalities), a sight-distance study at both driveways, a parking demand analysis with three analog-park comparisons, and a recommendation to change from four-way to side-street stop control at both driveways, with an added all-way stop at Calle de Compadres.

C. Continued CEQA Deficiencies

I158-7

1. A known sight-distance deficiency at Driveway #2 is deferred to the permit stage. The addendum acknowledges that the north-eastbound approach at Driveway #2 fails to meet County sight-distance standards under existing conditions, due to vegetation and rock outcroppings. The proposed "mitigation" is that clearing and grading "shall be completed and verified" through the standard site-plan review process before a grading permit issues. No plan, drawing, specific clearing prescription, or measurable performance standard is included in the EIR. This is a textbook deferred-mitigation problem. The deficiency is not speculative, it exists today, it has been measured, and it involves an identified intersection serving a primary project driveway.

I158-8

2. The two historical fatalities adjacent to the site received no independent geometric analysis. The crash history identifies a 2016 pedestrian fatality approximately 145 feet from the primary project driveway and a 2012 single-vehicle fatality in the same vicinity. The addendum attributes both entirely to driver or pedestrian conduct, relying on CHP fault determinations without any independent review of roadway geometry, sightlines, or curvature at those specific locations. The court directed the County to analyze hazards created by geometric design features; accepting law-enforcement fault attribution as a substitute for engineering review does not satisfy that instruction.

I158-9

3. The parking demand analysis is methodologically unsupported, and the County's overflow response creates a foreseeable pedestrian safety hazard on a roadway whose sight distances are already deficient.

The parking analysis in Appendix I1 relies on a single primary analog park, Hilton Head County Park, scaled to the Alpine site using a self-derived "2.5 area-based" acreage factor that is not drawn from any published methodology, peer-reviewed source, or professional transportation standard. A scaling factor invented for this analysis and applied to a single analog is not a methodology; it is a conclusion in search of a justification. No sensitivity analysis is presented, no alternative analog parks are evaluated, and no explanation is given for why Hilton Head is comparable in visitor profile, surrounding land use, or activity type.

The analysis's own demand estimate compounds the problem. Its combined peak-day projection of approximately 250 vehicles slightly exceeds the proposed 240-space on-site supply. The County's proposed response to that projected overflow is an operational scheduling protocol enforced by on-site volunteer and ranger staff, without a defined numeric trigger for County intervention, an

independent monitoring mechanism, or any physical mitigation backstop if the scheduling protocol fails. Mitigation must be "fully enforceable through permit conditions, agreements, or other measures." A voluntary staffing protocol with no defined threshold, no third-party oversight, and no physical remedy is not enforceable mitigation.

The consequences of parking overflow are not abstract. As a long-time resident immediately adjacent to this site, I can attest that overflow parking already occurs in the residential areas surrounding the project site during periods of high activity, impacting neighbors who have not consented to absorb the park's demand spillover. That pattern will intensify once the park is operational. Overflow vehicles will park on South Grade Road opposite the park entrance, on the roadway's east side, requiring visitors to cross South Grade Road on foot to reach the park.

I158-9 cont.

That pedestrian crossing is where the parking overflow problem and the sight-distance deficiency the RDEIR itself has documented collide into a single, foreseeable safety failure. The addendum acknowledges that the north-eastbound approach at Driveway #2 fails to meet County sight-distance standards under existing conditions due to vegetation and rock outcroppings — the very location where overflow pedestrians will be crossing. Drivers approaching from the north on South Grade Road, navigating the roadway's rolling vertical profile that causes vehicles to disappear from view in the dips, will have inadequate stopping sight distance for pedestrians stepping off the east shoulder to cross to the park. No pedestrian crossing improvements, marked crosswalks, warning signage, pedestrian refuge islands, or flashing beacons are proposed at this location.

I158-10

The RDEIR treats parking supply, pedestrian access, and sight distance as three separate analytical boxes. They are not. A project whose parking supply is projected to be exceeded on peak days, whose overflow vehicles will park on the roadway opposite a deficient sight-distance approach, and whose pedestrians will cross that approach without any engineered crossing protection has a compound public safety problem that the sum of the three individual analyses does not capture. The interaction between these conditions including predictable, foreseeable, and unaddressed, is itself a significant impact requiring analysis and mitigation.

I158-11

4. The reversal from four-way to side-street stop control at Calle de Compadres reduces safety protections at an intersection residents already know to be dangerous. The traffic analysis underlying that reversal rests on outdated data and ignores the roadway's physical geometry.

The 2023 FEIR proposed four-way stop control at the Calle de Compadres/South Grade Road intersection. The 2026 addendum reverses that determination, substituting side-street stop control and characterizing the change as an engineering improvement justified by traffic-volume asymmetry. The public is entitled to scrutinize this reversal carefully by substantive reduction in the safety controls at an intersection that will serve as a primary access point for both the park and an existing residential street, made in direct response to litigation alleging the project's driveway design is unsafe.

As a resident of Calle de Compadres with six years of direct daily experience at this intersection and twelve years living two blocks from the site, I submit the following first-hand account as evidence in this record. No commenter has more immediate knowledge of conditions at this location.

South Grade Road at Calle de Compadres is already dangerous under existing conditions. Sight lines to oncoming traffic are routinely obstructed by vehicles parked on the east side of South Grade Road, and approaching traffic from the north is hidden by blind curves in the roadway's horizontal alignment. Vehicle speeds on South Grade Road substantially exceed the posted limits. This is not a perception, it is a daily observable fact at this location. When I prepare to turn left onto Calle de Compadres from South Grade, I must activate my turn signal well in advance of the intersection because following vehicles, rather than slowing, routinely pass me illegally on the right as I slow to turn. This behavior, including illegal passing of a turning vehicle at an already-substandard intersection, is a predictable and recurring consequence of the road geometry and prevailing speeds at this location.

I158-11 cont.

Replacing four-way stop control with side-street stop control at this intersection will not improve safety. It will worsen it. A side-street stop assigns the right-of-way to the higher-volume mainline traffic on South Grade Road, leaving vehicles turning from Calle de Compadres and from the park driveway to gap-find across a road where speeds already exceed posted limits, sight lines are intermittently blocked by parked vehicles, and the road profile causes approaching vehicles to disappear from view before they reenter the driver's sight line. Adding park-generated traffic to this intersection without providing the four-way stop that the County itself previously determined was necessary compounds the hazard rather than addressing it. No geometric, lighting, or sight-line improvements to the intersection are proposed in the 2026 RDEIR.

The traffic analysis underlying this reversal is further compromised by its reliance on speed data collected approximately six years ago. South Grade Road's traffic character, including speeds, volumes, and turning movement patterns, has changed during the intervening years, and the County has presented no evidence that six-year-old measurements accurately represent the current baseline. A safety analysis whose conclusions about intersection control rest on an outdated speed baseline does not constitute substantial evidence sufficient to support a reduction in safety controls at a location with a documented fatal-crash history.

I158-12

Finally, the RDEIR ignores a physical characteristic of South Grade Road that fundamentally undermines both the sight-distance analysis and the stop-control justification, the roadway's severe rolling profile causes vehicles to disappear entirely from view as they pass through dips in the roadway adjacent to the park's proposed driveway locations. Sight-distance measurements that assume a continuous, unobstructed line of sight along a theoretical sight triangle do not account for a road geometry where approaching vehicles are intermittently invisible due to vertical curvature. A traffic safety analysis that does not confront this topographic reality is not a reliable basis for any intersection control determination, let alone one that reduces protections from the prior design.

The roadway adjacent to the park must be reconstructed. The rolling profile that causes vehicles to vanish from sight, the absence of turning lanes into and out of the park and existing residential

I158-12 cont.

streets, and the substandard intersection geometry at Calle de Compadres are not conditions that can be mitigated by changing a stop-sign configuration. They require physical roadway improvements, including reconstruction to eliminate the severe rolling profile, widening to provide dedicated turn lanes for park ingress/egress and for Calle de Compadres, and geometric correction at the intersection, before the project can be found to avoid creating or substantially worsening traffic safety hazards under CEQA.

I158-13

Request: The County should: (a) reevaluate the appropriate stop control at the Calle de Compadres intersection rather than reducing protections at a location with a documented fatal-crash history and active resident-observed safety concerns; (b) update the speed and volume data underlying the traffic analysis with current measurements; (c) commission a sight-distance and vertical-curve analysis that accounts for the roadway's actual rolling profile and the intermittent disappearance of approaching vehicles, rather than applying standard flat-terrain sight-triangle methodology to a topographically complex alignment; (d) evaluate whether physical roadway improvements like including reconstruction of the rolling profile and provision of dedicated turning lanes into and out of the park and existing residential streets are required as project mitigation before any intersection on South Grade Road can be found to operate safely under project conditions; (e) supplement the parking demand analysis with multiple analog comparisons drawn from published ITE or equivalent sources, or commission original demand data from directly comparable facilities; (f) establish a numerically defined overflow trigger, a legally enforceable response mechanism, and a physical mitigation backstop, such as designated off-site overflow parking with shuttle service, that does not depend solely on volunteer and ranger scheduling; (g) provide pedestrian crossing improvements at the on-street parking area opposite the park entrance, including at minimum marked crosswalks, advance pedestrian warning signage, and an assessment of whether a flashing beacon or other active device is warranted given prevailing vehicle speeds; (h) conduct a combined pedestrian-crossing sight distance analysis that accounts for both the roadway's rolling vertical profile and the location of expected overflow pedestrian crossings, separate from and in addition to the vehicle sight-distance analysis already performed; (i) reduce the speed of South Grade by 5-10 mph to improve overall safety.

I158-14

III. PIECEMEALING AND INADEQUATE CUMULATIVE IMPACTS ANALYSIS

A. CEQA's Cumulative Impacts and Anti-Piecemealing Requirements

CEQA requires an EIR to analyze the cumulative impacts of a project, the incremental contribution of the project's effects when combined with those of other past, present, and reasonably foreseeable future projects in the same area. The EIR must address cumulative impacts for "all projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency."

CEQA also prohibits piecemealing, the practice of fragmenting a project or analyzing related projects in isolation to avoid the full scope of environmental review. Where projects share the same geographic area, sensitive biological resources, transportation corridors, or emergency

I158-14 cont.

infrastructure, their combined effects must be examined together. The prohibition is especially important where, as here, multiple projects are proceeding concurrently through various approval processes and will act upon the same already-stressed ecological and safety systems and only further increase wildfire risk.

B. The RDEIR's Cumulative Projects List Is Incomplete

I158-15

The 2026 Recirculated Draft EIR's cumulative impacts analysis does not identify or analyze at least four known and reasonably foreseeable projects whose impacts on the same biological resources, road network, and wildfire infrastructure are directly cumulative with those of the Alpine County Park.

1. The Alpine Loop Project shares the South Grade Road corridor with the proposed County Park. The combined effect of both projects on road capacity and public exposure to wildfire evacuation risk has not been analyzed in the RDEIR's cumulative section. The traffic analysis in Section 4.17 and Appendix I1, which already documents a sight-distance deficiency at Driveway #2 and a five-year fatal-crash history on South Grade Road, does not account for the additional vehicle trips attributable to the Alpine Loop Project.

I158-16

The RDEIR still does not address safe access from the village, the center of our town. There remains no safe route by which pedestrians or cyclists, adults or children, can travel to and from the site.

At the September 3, 2026 Alpine Community Planning Group meeting, County Parks and Recreation staff presented the changes included in the RDEIR. There was a discussion about safe access to and from the park. Mr. Travis Lyon stated that the Alpine Loop Project has already been approved and is in the County budget, but is being held from moving forward because it is contingent on approval of the proposed Park. That statement confirms the two projects are interdependent. The Park project has been piecemealed from the outset. The RDEIR neither analyzes the cumulative impacts of the Alpine Loop Project nor identifies it as a safe-access option.

I158-17

2. SDG&E's proposed Suncrest Powerlink Loop-in project involves a new high voltage project and is located close to the park site. The RDEIR does not identify the Suncrest Powerlink Loop-in in its cumulative projects list and does not quantify the combined habitat loss, fragmentation, and construction-phase disturbance from both projects acting on the same biological populations. This is a material omission: for a species like the western spadefoot whose southern San Diego County populations already demonstrate effective population sizes near or below the threshold of genetic viability the failure to account for habitat fragmentation imposed by the Powerlink Loop-in compounds the adequacy problem in Section 4.4 and Appendix D2. The Loop-in Project will no longer allow for aerial firefighting due to the installation of the high voltage lines. The RDEIR

I158-17 cont. should consider the reduced wildfire fighting opportunity as it relates to the wildfire analysis for the park project.

I158-18 **3.** The County of San Diego is updating the Alpine Community Plan, the foundational land-use document governing development intensity, density, and open-space designations throughout the Alpine planning area. A community plan update is precisely the kind of "probable future project" that CEQA Guidelines requires to be included in a cumulative analysis. The Alpine Community Plan Update will determine how much additional residential, commercial, and institutional development occurs in the same geographic area, on the same road network, within the same Very High Fire Hazard Severity Zone, and in the same watersheds that support the sensitive biological resources the RDEIR addresses. An EIR for a regional park explicitly intended to serve the recreational needs of a growing Alpine community cannot meaningfully analyze cumulative traffic, biological, or wildfire impacts without incorporating the growth scenarios the Community Plan Update projects. The RDEIR neither identifies the Community Plan Update as a cumulative project nor attempts to bound the long-range growth-inducing effects that a new regional park, which functions as an amenity attractor for residential development, may have when combined with the land-use changes the update authorizes.

I158-19 **4.** The proposed Rancho Palo Verde 2 residential development would add 152 parcels adding a significant number of new residents to the Alpine area, all of whom would live, travel, and in emergencies, evacuate through the same Very High Fire Hazard Severity Zone and on the same road network as users of the proposed park. The cumulative consequences are direct and measurable across each of the RDEIR's most contested resource areas: (a) *Traffic:* Rancho Palo Verde 2's trip generation on South Grade Road and adjacent intersections, combined with park-generated peak-day traffic, has not been assessed, yet the RDEIR already identifies Driveway #2 as geometrically deficient and documents fatal crashes in the vicinity; (b) *Wildfire egress:* South Grade Road is the primary ingress/egress route for both the park and the surrounding residential community. Adding hundreds of park visitors on peak fire-weather days to an evacuation route that will also serve Ranch Palo Verde 2's new residents is a cumulative public-safety consequence the wildfire analysis does not address; (c) *Biological resources:* Residential development associated with Rancho Palo Verde 2 will impose additional impervious surface, lighting, pet predation pressure, and landscaping-related herbicide and pesticide loading on the same ephemeral pond and upland corridor system that supports the western spadefoot and pallid bat populations; and (d) *Genetics:* For a population already at or near genetic collapse, incremental habitat loss from multiple simultaneous development projects compounds harm in ways that project-by-project analysis conceals.

I158-20 **C. Cumulative Impacts on Shared Resources Are Materially Understated**

Biological Resources — Additive Fragmentation. The western spadefoot's southern San Diego County populations demonstrate effective population sizes. A population in this condition cannot

absorb incremental habitat fragmentation from multiple concurrent projects without additive and potentially synergistic harm. The RDEIR's biological analysis treats the Alpine County Park as if it were the only project acting on these populations. CEQA Guidelines requires the EIR to determine whether the project's contribution to habitat fragmentation, combined with impacts from the Suncrest Powerlink Loop-in, Rancho Palo Verde 2, and the Alpine Loop Project, is "cumulatively considerable." That analysis is absent.

Wildfire Safety — Compound Exposure and Egress Capacity. The Appendix J1 fire-behavior modeling evaluates the park in isolation. It does not analyze the cumulative public-safety consequence of the park, Rancho Palo Verde 2, and the Community Plan Update's projected development all placing additional visitors and residents in a Very High Fire Hazard Severity Zone with limited egress. South Grade Road's carrying capacity under combined evacuation load, including park visitors, existing Alpine residents, and future Rancho Palo Verde 2 residents evacuating simultaneously during a Santa Ana wind fire event, has not been modeled. This is a significant omission in light of the existing wildfire risk already documented in Appendix J1 (flame lengths up to 18.1 feet; ember spotting up to 1.1 miles under baseline conditions).

I158-20 cont.

Transportation — Cumulative Intersection Safety. The RDEIR's traffic analysis accounts only for park-generated trips. It does not analyze cumulative vehicle trips from Ranch Palo Verde 2 or the Alpine Loop Project on the same road network, and specifically at Driveway #2 approach where the sight-distance deficiency already exists. An intersection already identified as failing County sight-distance standards under existing conditions and adjacent to a corridor with documented fatal crashes cannot be evaluated for adequacy without accounting for the full cumulative traffic demand the road network must bear.

D. The Failure to Analyze These Projects Together Constitutes Piecemealing

The Alpine County Park, the Suncrest Powerlink Loop-in, the Alpine Loop Project, Rancho Palo Verde 2, and the Alpine Community Plan Update collectively share a common geographic footprint, the same biological resource corridor, the same road network, and the same emergency infrastructure. Where multiple projects before the same agency at overlapping stages of review act upon the same stressed resources, analyzing each in a separate EIR without confronting their combined effects is the piecemealing that CEQA's cumulative impacts requirements exist to prevent.

Request: The County should supplement the RDEIR's cumulative impacts analysis to: (a) identify and include the Alpine Loop Project, Suncrest Powerlink Loop-in, Alpine Community Plan Update, and Rancho Palo Verde 2 in the cumulative projects list; (b) analyze the combined effects of these five projects on western spadefoot habitat connectivity and population genetics, pallid bat roost sites, Quino checkerspot butterfly habitat, South Grade Road intersection safety and capacity, and emergency egress capacity during wildfire events; and (c) render an express significance

I158-20 cont.

determination as to whether the combined effects of these projects on shared biological resources, transportation infrastructure, and wildfire risk zones constitute a cumulatively significant impact—a determination the current RDEIR does not make.

IV. CONCLUSION

The prior EIR failed the public on the following important questions: what is the baseline fire risk before mitigation; and is the project driveway design safe for vehicles, pedestrians, and cyclists. The wildfire baseline data exists but is never adjudicated. The sight-distance deficiency is noted and then deferred.

I158-21

Several mitigation measures in the recirculated sections (including the sight-distance clearing requirement) defer specific mitigation commitments to future plans, permits, or management documents without establishing the performance criteria by which those future measures will be judged. This pattern of deferred mitigation without defined criteria is inconsistent with the CEQA requirement that mitigation be "fully enforceable through permit conditions, agreements, or other measures."

I respectfully request that the County supplement the recirculated EIR sections to address the specific deficiencies identified above before seeking renewed certification, and that it provides an additional public review period for any material revisions that result.

Alternatively, please reconsider going back to the drawing board all together and develop a proposal for a passive park on this site with the active amenities incorporated elsewhere in the community. This would expand the County's existing conservation/preservation land (that counts equally to the park to population ratio) while allowing continued beneficial use to the public. Please stop forcing this active park on a community that does not support the plans. Rather, be a good steward.

Thank you for accepting these comments.

Respectfully submitted,

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Comment Letter I158 Response: Comments I158-1 through I158-21

I158-1 This comment introduces the letter submitted by the commenter. Refer to responses I158-2 through I158-21 below.

I158-2 This is an introductory comment that describes the commenter's relationship with the community and introduces the concerns described in later comments. Refer to specific comments on the 2026 Recirculated Draft EIR below.

I158-3 The commenter asserts that the recirculated sections should state an independent significance conclusion for fire risk under existing conditions and that they improperly treat compliance with code requirements as project mitigation capable of reducing an otherwise-significant impact, rather than as part of the regulatory baseline. This is incorrect; refer to MR-20 (Baseline Wildfire Risk). No changes to the 2026 Recirculated Draft EIR are needed.

I158-4 The commenter asserts that the County's evacuation sequencing plan is an operational assumption that lacks a clear enforcement mechanism and therefore potentially underestimates the number of vehicles trying to evacuate the project vicinity during a wildfire. Refer to MR-18 (Emergency Evacuation) regarding project impacts to emergency response and evacuation, which were not required to be analyzed in the 2026 Recirculated Draft EIR and would not be affected by the revised analysis. While emergency evacuation was not required to be analyzed in the 2026 Recirculated Draft EIR, the following discussion is provided as courtesy to the commenter.

The commenter states that the 2026 Recirculated Draft EIR relies on an assumption, reportedly conveyed by County staff at the September 3, 2026 Alpine Community Planning Group meeting, that park visitors would be evacuated before residents and therefore would not contribute to congestion during a fire. To clarify, this was not conveyed by County staff at the meeting and was instead stated by a member of the Alpine Community Planning Group. However, the fire evacuation analysis in Appendix K does not rely on that assumption. It does the opposite: it represents a worst-case condition in which the parking lot is fully occupied, with all 240 vehicles evacuating, and all households, businesses, and vehicles in the evacuation area leave together once an evacuation order is issued. Park and resident vehicles are therefore modeled on South Grade Road and Alpine Boulevard at the same time, which is the combined evacuation load the commenter describes.

Because the results in Appendix K already place park and resident vehicles on the roadway together, they do not depend on the order of departure, and the conclusion does not rely on early park evacuation. If park visitors are directed to leave before an evacuation order is issued for the surrounding community, the effect on resident evacuation time would be no greater than reported. The 240-vehicle input also remains conservative under the updated parking analysis in Appendix I1, which projects a maximum parking demand of 131 vehicles for a single organized activity. Even under the overlapping-activity condition the parking management program is designed to prevent (approximately 250 vehicles), the additional 10 vehicles would represent about 0.2 percent of the 4,269 vehicles evacuating under existing-plus-project conditions and

would not materially change the results of Appendix K, which concluded that project evacuation traffic would not result in unsafe evacuation timeframes and that evacuation flow could be effectively managed. No changes to the 2026 Recirculated Draft EIR are needed. Please also refer to MR-9 (Wildfire) in Volume 4 Chapter 3, *Response to Comments on the Draft EIR And Recirculated Draft EIR* for additional information on emergency evacuation.

I158-5 This comment repeats the request made in comments I158-3 and I158-4 above regarding the project's baseline and evacuation analyses. Refer to responses I158-3 and I158-4 above.

I158-6 This comment summarizes the Court's mandate and the revised analysis in Appendix I1 as an introduction to specific concerns raised in I158-7 through I158-13 below. To clarify, the project no longer proposes an all-way stop on South Grade Road, and instead proposes a side-street stop control at Calle de Compadres.

I158-7 The commenter asserts that the recirculated transportation analysis improperly defers corrective clearing for sight distance at Driveway #2. Refer to MR-25 (Driveway #2 Sight Distance) regarding implementation of Driveway #2 sight distance requirements. No changes to the 2026 Recirculated Draft EIR are needed.

I158-8 The commenter states that the project's crash history is not sufficient for analyzing roadway hazards, which they assert should be assessed through a review of roadway geometry, sightlines, or curvature. However, the Addendum to the TIS (Appendix I1) does not rely upon the absence of roadway-related fault in past crashes to determine whether the project introduces or substantially increases a traffic hazard. The crash history helps inform whether an existing roadway design hazard is present, while the project's parking, sight distance, pedestrian, and bicyclist evaluations address how future park users would interact with South Grade Road and whether the project introduces or substantially increases a traffic hazard. An increase in the number of park users, by itself, does not establish a hazard under CEQA Appendix G, Criterion XVII(c). The relevant question is whether the project introduces or worsens a design condition that creates a substantial hazard, which Appendix I1 concludes the project would not. No changes to the 2026 Recirculated Draft EIR are needed.

I158-9 The commenter asserts that the analog park selection is unsupported; the sports programming protocol is unenforceable; and the sight distance issue at Driveway #2 will combine with the aforementioned issues to result in increased risk to pedestrians. Regarding the analog park selection, refer to MR-22 (Analog Park Selection); Hilton Head County Park is suitable comparison. Also refer to MR-28 (Sports Programming Protocol); the project's parking management program is enforceable and not required to conclude a less than significant impact to pedestrian and bicyclist safety, and no changes to the 2026 Recirculated Draft EIR are needed.

The Addendum to the TIS (Appendix I1) considered the above sight distance and sports programming analyses when assessing pedestrian and bicyclist safety and acknowledged that these issues are interconnected. Refer to MR-21 (Pedestrian and Bicyclist Safety); safety impacts to pedestrians and bicyclists would be less than

significant. Attachment D of Appendix I1 describes the additional improvements considered and why they were not incorporated into the project at this time; for example, traffic signal warrants are based on field-observed operating conditions such as vehicular volumes and peak-hour delay, which cannot be definitively measured prior to project construction. County of San Diego Department of Public Works (DPW) would continue to regularly analyze traffic incidents, reports, and violations to assess the conditions and would recommend improvements if deemed necessary. Anyone wishing to file a concern or complaint may contact the Transportation Division's front desk at 858-694-3850. Concerns or complaints related to County Maintained Roads can also be submitted through the 'Tell Us Now' mobile app available for download in either the Google Play Store or Apple App Store. Additionally, road concerns can be reported by filling out and submitting a Road Service Request Form, available at: https://www.sandiegocounty.gov/content/sdc/dpw/roads/Roads_Service_Request.html. No changes to the 2026 Recirculated Draft EIR are needed.

I158-10 The commenter asserts that the 2026 Recirculated Draft EIR treats parking supply, pedestrian access, and sight distance as three separate issues. However, as described in MR-28 (Sports Programming Protocol), the Addendum to the TIS (Appendix I1) did acknowledge the interactions between these factors. The 2026 Recirculated Draft EIR appropriately analyzes the factors that contribute to roadway hazards, and no changes to the 2026 Recirculated Draft EIR are needed.

I158-11 The commenter asserts that replacing the previously-proposed all-way stop at the Calle de Compadres intersection with a side-street stop control would worsen safety on South Grade Road. As described under Threshold 3 of Section 4.17.4.3 in Volume 2, the relatively low side-street and driveway volumes compared to South Grade Road would create substantially differing approach volumes, and all-way stop control under these conditions would impose unnecessary delay on through traffic. Installing all-way stop control at an unwarranted location may also introduce operational and safety concerns, including rear-end collision potential from unexpected deceleration on a high-speed approach, queue spillback into the through traffic stream, and reduced driver compliance over time if the control device is perceived as unnecessary. Based on the availability of adequate stopping sight distance and corner sight distance, side-street stop control is recommended and proposed at both Driveway #1 and Driveway #2. This side street stop control would require exiting park vehicles to stop and yield before entering South Grade Road while allowing through traffic on South Grade Road to remain unimpeded, avoiding the potential operational and safety concerns posed by an all-way stop in these locations. Therefore, a side-street stop would improve safety along South Grade Road. Additionally, County of San Diego Department of Public Works (DPW) would continue to regularly analyze traffic incidents, reports, and violations to assess the conditions and would recommend improvements if deemed necessary. Anyone wishing to file a concern or complaint may contact the Transportation Division's front desk at 858-694-3850. Concerns or complaints related to County Maintained Roads can also be submitted through the 'Tell Us Now' mobile app available for download in either the Google Play Store or Apple App Store. Additionally, road concerns can be reported by filling out and submitting a Road Service Request Form, available at:

https://www.sandiegocounty.gov/content/sdc/dpw/roads/Roads_Service_Request.html. No changes to the 2026 Recirculated Draft EIR are needed.

The comment also states that the June 2020 traffic counts should not be used because they were collected during the COVID-19 shelter-in-place period. That issue was already identified and addressed in the original traffic study. The Alpine Community Park Transportation Impact Study (Appendix I) used traffic counts collected in both March 2020, before the shelter-in-place order, and June 2020, during the order. The June counts were found to be at least 10 percent lower than the March counts. The study therefore compared the March and June roadway volumes and adjusted the June counts upward using the observed difference (12 percent) so that the analysis represented normal traffic conditions rather than the reduced COVID-period volumes. The adjusted counts, rather than the raw June counts, were then used in the traffic analysis. Regardless, the age of the 2020 data does not change the conclusions of the safety analysis. The sight distance measurements (conducted in April 2026) and crash data (2021 through 2025) are current. The traffic counts are used to inform the traffic control device at the project driveways. Even with the 12 percent COVID adjustment described above, the traffic volumes stay far below the all-way stop warrant. Only 1 or 2 vehicles per hour exit Calle de Compadres, and an all-way stop requires 140 vehicles per hour for eight hours. Growth on South Grade Road alone would not satisfy the all-stop warrant, and park exits (131 vehicles at the single-sport peak) also stay below the warrant.

The speed data raise a separate issue and, if anything, the conditions under which they were collected make them conservative for the sight-distance analysis. Operating speed is influenced by roadway geometry, posted speed, traffic density, and the amount of interaction or "friction" created by other vehicles. Under lower-volume conditions, drivers generally have greater freedom to select their desired speed because they are less constrained by surrounding traffic. Additionally, the posted speed limits along South Grade Road have not changed since 2017, and none of the three crashes in the study area were attributed to unsafe speed. Therefore, the analysis in Appendix I1 is adequate, and no changes to the 2026 Recirculated Draft EIR are needed.

I158-12 The commenter states that the project's sight-distance analysis must consider the topography of South Grade Road instead of assuming a continuous, unobstructed line of sight along a theoretical sight triangle. The roadway curvature and rolling profile are accounted for in two separate ways, as described in Appendix I1. First, they are inherently reflected in the observed operating speeds because drivers select their speed in response to the roadway environment they actually experience. Second, and more importantly, the physical geometry was evaluated directly during the field sight-distance measurements. The project's traffic engineer measured the available sight distance along the actual roadway profile to the point where a crest curve, horizontal curve, vegetation, terrain, or other physical feature obstructed the driver's view. Thus, if a vehicle or object disappears behind a crest or through a dip, the available sight distance ends at that obstruction. The analysis does not assume a flat or continuously visible roadway.

This is demonstrated by the results at Driveway #1, where the existing vertical crest on South Grade Road is the feature that limits the northbound available stopping sight distance to approximately 425 feet. That measured distance still satisfies the applicable AASHTO stopping sight distance requirement at the conservative 50-mph design speed. The roadway profile is therefore not omitted from the analysis; it is directly reflected in both the observed operating speed and the field-measured available sight distance. Therefore, the analysis in Appendix I1 is adequate, and no changes to the 2026 Recirculated Draft EIR are needed.

I158-13 The commenter requests an updated analysis that considers the issues raised in comments I158-7 through I158-12 above. As described in the responses above, the 2026 Recirculated Draft EIR is adequate as written, and no changes to the 2026 Recirculated Draft EIR are needed

I158-14 This comment explains the purpose and requirements of CEQA's cumulative analysis as an introduction to the project-specific concerns detailed in later comments. Refer to responses I158-15 through I158-21 below regarding the project's cumulative analysis.

I158-15 This comment asserts the 2026 Recirculated Draft EIR's cumulative projects list is incomplete and introduces the four specific projects discussed in comments I158-16 through I158-20. Refer to responses I158-16 through I158-20 below.

I158-16 The commenter asserts that the 2026 Recirculated Draft EIR's analysis is deficient because it does not account for the additional vehicle trips attributable to the Alpine Loop Project (referred to by the County as the "Alpine Community Loop Project"). The Alpine Community Loop Project is a potential future project listed on the County's 2023-2028 Capital Improvement Needs Assessment (CINA) which was anticipated to receive funding within this 5-year timeline. The scope of the Alpine Community Loop project includes connections to the Alpine Park Project, but the two projects are independent from one another. The Alpine Park Project may proceed without the Alpine Community Loop Project and vice versa. The specific alignment, funding mechanism, and construction timeline for the Alpine Community Loop Project have not yet been identified, and the Alpine Community Loop Project remains entirely conceptual at this time. As such, there is not enough project-specific information about the future Alpine Community Loop Project to consider it a reasonably foreseeable project that must be included in the project's cumulative analysis. Furthermore, any analysis would be ill-informed, as there is not enough project-specific information to draw conclusions about the Alpine Community Loop Project's potential environmental impacts. Additionally, the Alpine Community Loop Project is not listed in the 2026-2031 CINA so is not anticipated to be funded by the County in the next five years. Without funding or any relevant information with which to conduct any analysis, the Alpine Community Loop Project is not a reasonably foreseeable project. Refer to MR-21 (Pedestrian and Bicyclist Safety); safety impacts to pedestrians and bicyclists would be less than significant. No changes to the 2026 Recirculated Draft EIR are needed.

I158-17 The commenter asserts that the 2026 Recirculated Draft EIR's analysis is deficient because it does not account for the biological and wildfire impacts of San Diego Gas and Electric's (SDGE's) Suncrest Powerlink Loop-in Project (referred to by SDGE as the

"Suncrest 230kV Loop-in Project"). The Suncrest 230 kV Loop-in Project is described in preliminary detail on SDGE's website (https://www.sdge.com/suncrest-230kv-loop-project), which has a project fact sheet and administrative Draft EIR submitted by SDGE with its May 8, 2026 application to the California Public Utilities Commission (CPUC) (A.26-05-005). The CPUC, as CEQA lead agency, issued a Notice of Preparation for the project EIR on August 21, 2026 (State Clearinghouse No. 2026080812). While the final alignment is forthcoming, the overhead portion of the Suncrest 230 kV Loop-in Project is currently proposed approximately one mile south of the Alpine County Park site, across Tavern/Japatul Road. Additionally, the Notice of Preparation does not include any analysis of the Suncrest 230kV Loop-in Project or its associated impacts. Furthermore, any analysis would be ill-informed, as there is not enough project-specific information to draw conclusions about the Suncrest 230 kV Loop-in Project's potential environmental impacts.

The 2026 Recirculated Draft EIR did not include a revised cumulative analysis with the Suncrest 230 kV Loop-in Project because the Suncrest 230 kV Loop-in Project does not affect the cumulative analyses for the issues identified in the Court's June 9, 2025 Minute Order. Refer to MR-16 (Scope of the RDEIR), which explains that the 2026 Recirculated Draft EIR was only required to address the avoidance buffers for western spadefoot and pallid bat, fire risk, and traffic hazards on South Grade Road.

Regarding western spadefoot and pallid bat, Section 5.3.4 concludes that the project would not result in cumulatively considerable impacts to biological resources because the project includes mitigation per the County's MSCP Subarea Plan. The Suncrest 230 kV Loop-in Project would not result in potential impacts to pallid bat and would mitigate all potential impacts to western spadefoot, according to the May 2026 administrative Draft EIR, and would therefore not result in a new cumulative effect on biological resources or change the cumulative project setting related to western spadefoot or pallid bat. As such, the Suncrest 230 kV Loop-in Project would not alter the project's conclusion regarding cumulative impacts on biological resources. The addition of the Suncrest 230 kV Loop-in Project (or any other project) would not change the conclusions of the cumulative analysis for biological resources because the project's mitigated contribution to cumulative impacts would remain less than cumulatively considerable.

Regarding wildfire, Section 5.3.20 concludes that all cumulative projects would be required to comply with regulations regarding fire safety—such as the County Code of Regulatory Ordinances, California Public Resources Code Section 4291, and the California Building Standards Code—and no cumulative impact would result. Furthermore, the project would not result in a cumulatively considerable impact because it would implement fire prevention measures and comply with the relevant codes to reduce the potential for ignition and wildfire spread. Any future project, including the Suncrest 230 kV Loop-in Project, would be required to comply with regulations regarding fire safety (such as California Public Resources Code Section 4291 and the California Building Standards Code), and the addition of the Suncrest 230 kV Loop-in Project (or any other project) would not change the conclusions of the cumulative analysis for wildfire because the project's contribution to cumulative impacts would remain less than cumulatively considerable.

Regarding traffic hazards due to geometric design features or incompatible uses, Section 5.3.17 of Volume 2 concludes that cumulative traffic hazard effects would not be significant, and the Suncrest 230 kV Loop-in Project would not change that conclusion or the conclusions of Appendix I1. The driveway sight distance findings are based on the physical geometry of South Grade Road, roadway grade, design speed, vegetation, and terrain. The all-way stop warrants at Calle de Compadres were not met because of the crash history and the low minor-street volumes, and additional through traffic on South Grade Road would not change either finding. The comment does not identify any change the Loop-in Project would make to the alignment, cross-section, or sight lines of South Grade Road.

The Loop-in Project would also not change the conclusions of the fire evacuation analysis in Appendix K. The cumulative scenarios in Appendix K already include a 10 percent increase in evacuating vehicles across the entire evacuation area (403 vehicles), and as a transmission line project, the Loop-in would not add a residential, employee, or visitor population that would need to evacuate. Appendix K also does not take credit for aerial firefighting. Evacuation times are calculated from the number of evacuating vehicles and the capacity of the evacuation routes, with no reduction applied for fire suppression. A change in aerial firefighting capability near the Loop-in alignment would therefore not change the evacuation times reported in Appendix K. Regardless, aerial firefighting capability is not required for the project. Aerial capability is required for structures that are more than 30 feet in height, none of which are proposed for the project.

In conclusion, the 2026 Recirculated Draft EIR is valid, and the cumulative analysis does not need to be modified as a result of the projects described by the commenter.

I158-18 The commenter asserts that the 2026 Recirculated Draft EIR's analysis is deficient because it does not account for the transportation, biological, and wildfire impacts of the Alpine Community Plan Update. However, as described on the County's website (https://www.sandiegocounty.gov/content/sdc/pds/CommunityGroups/AlpineCommunityPlanUpdate.html), the County is currently re-evaluating the scope and process for community plan updates, and the Alpine Community Plan Update is on hold for the foreseeable future in consideration of County Board of Supervisors direction for Vehicle Miles Traveled (VMT) guidelines updates and the Sustainable Land Use Framework process. Additionally, the County's re-evaluation process could result in new direction or other actions for the County's Community Planning program at a later date, include the referenced Alpine Community Plan Update. As such, there is not enough project-specific information about the Alpine Community Plan Update to consider it a reasonably foreseeable project that must be included in the project's cumulative analysis. No changes to the 2026 Recirculated Draft EIR are needed.

I158-19 The commenter asserts that the 2026 Recirculated Draft EIR's analysis is deficient because it does not account for the transportation, biological, and wildfire impacts of the Rancho Palo Verde 2 residential project (also known as the Bell Bluff extension). Rancho Palo Verde 2 has been a pending project since the late 1970s but has not been realized due to a number of factors, including water availability and entitlement complications. While the County continues to correspond with the applicant, it is unknown at what

time Rancho Palo Verde 2 will, if ever, be constructed. As such, there is not enough project-specific information about the Rancho Palo Verde 2 project to consider it a reasonably foreseeable project that must be included in the project's cumulative analysis. Regardless, the Rancho Palo Verde 2 project site is designated semi-rural residential (SR-2) in the 2011 General Plan, which allows a maximum base density of one dwelling unit per 2 gross acres, or 0.5 dwelling units per acre (du/ac), dependent on slope. The lots within Rancho Palo Verde 2 were subdivided by Tentative Maps TM 3832 and TM 4553, and the corresponding final maps have been recorded resulting in 171 lots within a 584.35-acre site, with a resultant density of 1 dwelling unit per 3.42 acres. During the more than 20 years these proposed subdivisions have remained undeveloped, there have been significant changes in local requirements that will need to be addressed at the time development permits and approvals are sought. It is not known at this time if a review and analysis of these requirements will allow for the full development of the proposed subdivisions. As such, there is not enough project-specific information about the Alpine Community Plan Update to consider it a reasonably foreseeable project that must be included in the project's cumulative analysis. No changes to the 2026 Recirculated Draft EIR are needed.

I158-20 This comment reiterates the cumulative analysis concerns raised in the preceding comments. Refer to responses I158-1 through I158-19 above.

I158-21 This comment summarizes the commenter's opposition to the project. Refer to responses I158-3 through I158-20 above regarding the concerns raised in this comment. The commenter's preference for a passive project alternative is noted, but the 2026 Recirculated Draft EIR was required to address only the issues identified in the Superior Court's June 9, 2025 Minute Order and January 20, 2026 Writ of Mandate, which does not include the project's alternatives analysis, as described in MR-16 (Scope of the RDEIR). Also refer to MR-17 (Project Scope and Alternatives) regarding the project's design. No changes to the 2026 Recirculated Draft EIR are needed.

Comment Letter I159: Joyce Nygaard, September 14, 2026

Comment Letter I159

From: joyce nygaard
To: CEQA CountyParks
Subject: [External] Alpine County Park Project - SCH#2021030196
Date: Monday, September 14, 2026 4:28:49 PM

Hello, Megan,

I159-1 I am writing in response to the 2026 Recirculated Draft EIR (2026 RDEIR) for the Alpine County Park.

Transportation and Circulation

The first assumption made in the Transportation section is that the Alpine County Park will be a "local, community park." Based on this assumption, comparison was made to Hilton Head County Park in El Cajon. Hilton Head Park is 10 acres vs. the Alpine Park at 25 active acres, 98 acres overall. Hilton Head has 56 parking spaces; the plan for Alpine is 240 spaces. Hilton Head has a playground, splash pad, one sports field, a basketball court, exercise stations, and picnic areas. It does NOT have a bike park, skate park, equestrian area, dog park, or pickleball courts. While Hilton Head meets the criteria for a local park, the design for the Alpine Park meets the criteria for a Regional Park. In fact, the San Diego Mountain Bike Association has loudly advocated for the bike park at this location so that it's members from all over the County will

I159-2 have a new place to ride. Because the 2026 RDEIR treats the Alpine park as a local park, its conclusions on VMT and LOS are suspect.

According to the 2026 RDEIR, visitor volume to the park would be about 500 per weekday, up to 1000 on weekends, and 2000 for special events. Parking may be adequate for the daily rate, but where are the weekend or special event visitors going to park? They will have to park on South Grade or on neighboring private streets and cross to the park.

This brings us to the volume of traffic on South Grade Road. The 8-hour volume of traffic on South Grade was measured in June of 2020. This was, as you may recall, a time when many businesses and schools were closed. Therefore, the "peak" traffic numbers from 2020 should not be used to determine traffic numbers in 2026. Further, the 2026 RDEIR has determined that there are no stopping sight deficiencies in the area of the park, so pedestrians and bicyclists would be safe crossing or riding on South Grade. The document also mentions the pedestrian fatality that occurred about 145 feet south of planned driveway #1. The conclusion

I159-3 was that the pedestrian, who had parked on South Grade, was at fault because she crossed where there was no crosswalk. However, if the line of sight and stopping distance in the vicinity are as great as the 2026 RDEIR claims, why wasn't the driver able to see the pedestrian and at least try to stop?

I159-4 **Fire**

I159-4 cont.

The planned Alpine park is in a Very High Fire Hazard area. In 1970, the Laguna Fire burned a large portion of this property. The West Fire in July of 2018 also burned a section of the planned park. That fire was very fast moving, burning 350 acres in less than 90 minutes. According to the 2026 RDEIR, evacuation of the park property and the surrounding areas would take between 2 to 2 ½ hours. In a fire moving as quickly as the West Fire did, that would not be enough time for everyone to get out safely. During the 2003 Cedar Fire, I lived on South Grade Rd., just two properties over from the planned park. It did indeed take 2 hours to evacuate from that property to Alpine Blvd. Add to that recent development and the possibility of 250 additional vehicles from the park and evacuation times would easily be approaching the 2 ½ hour mark.

I159-5

The County's plan to mitigate fire hazard on the park property is to use only low growing vegetation, put up signs banning smoking, and tape the BBQs up during red-flag days. They also suggest that the equestrian area could be used as a safe area for horses during a fire. The planned equestrian area is the part of the property that burned during the West Fire.

I159-6

Conclusion

A park of this size would put residents and visitors at increased risk during a wildfire event. It would also increase VMT and decrease LOS by attracting visitors from the surrounding Region. The 2026 RDEIR conclusions are based erroneous assumptions and outdated data. The 2026 RDEIR still does not adequately address CEQA deficiencies identified by the Superior Court.

Thank you.
Joyce Magruder Nygaard

Virus-free.www.avast.com

Comment Letter I159 Response: Comments I159-1 through I159-6

I159-1 This comment is introductory and does not address the adequacy of the environmental analysis in the 2026 Recirculated Draft EIR. Refer to specific comments in responses I159-2 through I159-6 below.

I159-2 This comment asserts that the classification of the project as a local park results in an underestimation of VMT and LOS, asks about parking during special events, and states that using traffic volumes from June 2020 are not representative of today's conditions. Regarding special event parking, refer to MR-28 (Sports Programming Protocol) for information about the project's parking management program, which is not required to conclude a less than significant impact to pedestrian and bicyclist safety. In other words, even without this parking management program, the project would result in a less than significant impact to pedestrian and bicyclist safety. Special events are either subject to the County of San Diego's Community Events Permits (additional information available here: www.sandiegocounty.gov/content/sdc/deh/fhd/food/cep) or require County DPR Director approval to ensure consistency with the park's rules and regulations. Additionally, the commenter indicates Hilton Head is not an appropriate analog park for comparison to the proposed park. Refer to MR-22 (Analog Park Selection) for additional detail on why Hilton Head was selected as the analog park.

Regarding VMT, LOS, and the project's traffic volumes, refer to MR-16 (Scope of the RDEIR); these issues were not components of the Writ and are beyond the scope of the 2026 Recirculated Draft EIR. Regardless, the following discussion is provided as a courtesy to the commenter.

Appendix I1 describes the trip generation methodology for the project. The analysis does not characterize the project as a local park, as the commenter suggests. While Alpine Community Park is intended to be a community park, the SANDAG trip generation rates do not have a standalone "community park" category. The Regional Park (not local park) rate was selected as the more appropriate rate given the project's rural, unincorporated context and comparatively smaller surrounding population relative to a typical urban city park, while also consistent with the rate applied in the previously approved 2020 TIS. This rate is considered a conservative estimate of actual demand, and the project's VMT and LOS are therefore not underestimated. No changes to the 2026 Recirculated Draft EIR are needed.

The comment also states that the June 2020 traffic counts should not be used because they were collected during the COVID-19 shelter-in-place period. That issue was already identified and addressed in the original traffic study. The Alpine Community Park Transportation Impact Study (Appendix I) used traffic counts collected in both March 2020, before the shelter-in-place order, and June 2020, during the order. The June counts were found to be at least 10 percent lower than the March counts. The study therefore compared the March and June roadway volumes and adjusted the June counts upward using the observed difference so that the analysis represented normal traffic conditions rather than the reduced COVID-period volumes. The adjusted counts, rather than the raw June counts, were then used in the traffic analysis. Therefore, the analysis

in Appendix I1 is adequate, and no changes to the 2026 Recirculated Draft EIR are needed.

I159-3 The commenter inquires about why the pedestrian fatality 145 feet south of planned Driveway #1 occurred if the line of sight and stopping distance in the vicinity are sufficient, as described in Section 4.17 of Volume 2 and Appendix I1. As described in Appendix I1, the driver of the involved vehicle was found not at fault and was proceeding straight southbound at the time of the collision. While the fatality is acknowledged as a serious prior incident within the project corridor, the record indicates it was not attributable to a geometric deficiency of the roadway but rather to a pedestrian violation. Refer to MR-21 (Pedestrian and Bicyclist Safety); the project's proposed pedestrian path along the west side of South Grade Road would prevent pedestrians from walking within the roadway, and a driver traveling on South Grade Road under normal daytime conditions has sufficient sight distance to perceive a pedestrian or bicyclist near either driveway location and bring the vehicle to a complete stop before reaching the individual. No changes to the 2026 Recirculated Draft EIR are needed.

I159-4 The commenter expresses concern about emergency evacuation. Refer to MR-18 (Emergency Evacuation) regarding project impacts to emergency response and evacuation, which were not required to be analyzed in the 2026 Recirculated Draft EIR. Please also refer to MR-9 (Wildfire) in Volume 4 Chapter 3, *Response to Comments on the Draft EIR And Recirculated Draft EIR* for additional information on emergency evacuation. No changes to the 2026 Recirculated Draft EIR are needed.

I159-5 This comment summarizes information presented in the 2026 Recirculated Draft EIR and notes that the planned equestrian area that is identified as a safe wildfire refuge area in Section 4.20 is the part of the property that burned during the West Fire. The equestrian area proposed as part of the project would be a component of the larger developed area of the park, which would change existing natural and fire-prone vegetation to fire-resistive landscaping, paved areas, and other cleared areas that would provide a buffer from wildfire.

I159-6 The commenter reiterates their belief that the 2026 Recirculated Draft EIR is deficient. Refer to responses I159-1 through I159-5 above, which explain that the revised analysis is adequate, and no changes to the 2026 Recirculated Draft EIR are needed.

Comment Letter I160: Victoria Perez, September 13, 2026

Comment Letter I160

From: Victoria Perez
To: CEQA, CountyParks
Subject: [External] Alpine Park Project (SCH No. 2021030196) Public Comment
Date: Sunday, September 13, 2026 10:21:56 PM
Attachments: Alpine Park Project (SCH No. 2021030196).pdf

Megan Doran
Project Manager
Department of Parks and Recreation
County of San Diego, Parks and Recreation
5500 Overland Avenue, Suite 410, San Diego, CA 92123

By email to: CountyParksCEQA@sdcounty.ca.gov

RE: Alpine Park Project (SCH No. 2021030196)

I160-1 I Please see attached PDF Public Comment Letter opposing the Alpine Park Project.

Sincerely,

Victoria Perez

1038 Alpine Heights Road
Alpine, Ca 91901

September 13, 2026

Megan Doran
Project Manager
Department of Parks and Recreation
County of San Diego, Parks and Recreation
5500 Overland Avenue, Suite 410, San Diego, CA 92123

By email to: CountyParksCEQA@sdcounty.ca.gov

RE: Alpine Park Project (SCH No. 2021030196)

Dear Ms. Doran,

Please read the following comments I am submitting regarding the Alpine Park Project's Recirculated Draft Environmental Impact Report (DEIR).

I160-2 My name is Victoria Perez. I have been an elementary educator for sixteen years and have a longstanding connection to the Alpine community. I lived in Alpine from 1987 to 2010 and because of my deep love for the community, moved back from out of state in 2021 and have lived here ever since.

There are many concerns I have about the revised sections including; sections 4.4 Biological Resources, 4.9 Hazards and Hazardous Materials, 4.17 Transportation and Circulation, and section 4.20 Wildfire.

4.4 Biological Resources

I160-3 I am very concerned about the Western Spadefoot and the filling in of breeding pool AP-7 during construction especially with the super El Nino and the possibility of higher and larger egg masses during wetter years. I am also concerned because the Western Spadefoot can travel up to 600 meters from breeding pools and that USGS recommends an undeveloped 300- to 400-meter buffer. I remain concerned that the proposed park development and associated human activity will eliminate or substantially degrade upland habitat used by this species. Why is the county's selected buffer adequate despite the larger distances identified by the Court and USGS?

I160-4 I am also concerned about the appropriate buffer for the Pallid Bat. The buffer cannot be determined until after a roost is discovered, so how can the EIR confidently conclude now that 200 feet will reduce the significant impact to less than significant?

I160-5 **4.9 Hazards and Hazardous Materials**

I160-5 cont. Living in East County I am always worried about wildfire hazards and risks. And after reading that the "Operation of the project could introduce new conditions that could exacerbate wildfire risk" and understanding that "the park will introduce visitors who are not currently present" and seeing that the report further acknowledges that, "human activity could increase wildfire risk because many Southern California wildfires are human-caused" I am extremely concerned to develop this park and this huge unnecessary risk to our neighborhoods.

I160-6 I also noticed that it was stated that the project would not interfere with emergency evacuation and not increase evacuation times. But what if there were 1,000 people there as expected on a high volume weekend, wouldn't the amount of time to evacuate off of South Grade increase the time for the residences as well as the park crowds?

I160-7 **4.17 Transportation and Circulation**
I am concerned about the hazards of the Alpine community walking to the park from residences. Does the proposed decomposed-granite path actually provide a continuous, safe connection between the surrounding residential areas and the park? Will the pedestrians and bicycles still need to cross South Grade Road at the park entrances while traffic is yielding to them? This option to get to the park is still a hazard that is not completely explained.

I160-8 **4.20 Wildfire**
The modeling that was in the DEIR indicates that under Santa Ana wind conditions, a wildfire affecting the project area could produce flame lengths of up to 18.1 feet, spread at rates of up to 6.2 miles per hour, and produce ember spotting up to 1.1 miles. These conditions raise serious concerns about whether visitors can be safely evacuated if a fire develops rapidly while the park is occupied. Can the county demonstrate that evacuation can remain safe under these extreme fire-behavior conditions? Rather than relying primarily on general evacuation procedures and future operational planning.

I160-9 With my concerns to each of the revised sections of the Recirculated Draft Environmental Impact Report (DEIR) I still would like to express my opposition to such a large park. We deserve something better fit for Alpine like a Nature-Based "Passive" Park. Thank you for taking the time to consider my input. I would like to receive all notices relating to this project at 23.victoria@gmail.com.

Sincerely,

Victoria Perez

Victoria Perez

Comment Letter I160 Response: Comments I160-1 through I160-9

I160-1 This comment introduces the letter submitted by the commenter. Refer to responses I160-2 through I160-9 below.

I160-2 This is an introductory comment that describes the commenter's relationship with the community and introduces the concerns described in later comments. Refer to specific comments on the 2026 Recirculated Draft EIR below.

I160-3 The commenter expresses concern about impacts to western spadefoot breeding pool AP-7 and asks why the County's 262-meter buffer is adequate to protect western spadefoot. Refer to MR-24 (Breeding Pool AP-7); impacts to breeding pool AP-7 would be fully mitigated. Also refer to MR-26 (Western Spadefoot Buffer); the proposed 262-meter buffer is sufficient. No changes to the 2026 Recirculated Draft EIR are needed.

I160-4 The commenter asks how a 200-foot buffer around bat roosts can be determined to be effective now, before bat roosts are identified. Refer to MR-27 (Pallid Bat MM-BIO-8); final avoidance buffers would be determined after roosts are discovered during the initial survey effort, but a minimum avoidance buffer of 200 feet has been demonstrated to be effective to protect bat roosts. Additionally, MM-BIO-8 has been revised to expand the survey buffer to 400 feet beyond the project construction footprint to ensure that any roost requiring a buffer greater than 200 feet (ex: for stationary sources or lighting without shields) would be identified during preconstruction surveys and appropriate buffers would be implemented

I160-5 The commenter expresses concern about wildfire ignition and spread. Refer to MR-19 (Wildfire Ignition and Spread); the project would not exacerbate wildfire risk. No changes to the 2026 Recirculated Draft EIR are needed.

I160-6 The commenter expresses concern about emergency evacuation. Refer to MR-18 (Emergency Evacuation) regarding project impacts to emergency response and evacuation, which were not required to be analyzed in the 2026 Recirculated Draft EIR. Please also refer to MR-9 (Wildfire) in Volume 4 Chapter 3, *Response to Comments on the Draft EIR And Recirculated Draft EIR* for additional information on emergency evacuation. No changes to the 2026 Recirculated Draft EIR are needed.

I160-7 The commenter expresses concern about pedestrian and bicyclist safety along South Grade Road. Refer to MR-21 (Pedestrian and Bicyclist Safety); safety impacts to pedestrians and bicyclists would be less than significant, even without dedicated pedestrian or bicyclist crossings at the park entrances. No changes to the 2026 Recirculated Draft EIR are needed.

I160-8 The commenter reiterates concerns related to emergency evacuation. Refer to response I160-6 above.

I160-9 This is a concluding comment that reiterates the commenter's opposition to the project but does not address the adequacy of the environmental analysis in the 2026 Recirculated Draft EIR. No changes to the 2026 Recirculated Draft EIR are needed.

Comment Letter I161: JP Phelps, July 31, 2026

Comment Letter I161

From: litning@cox.net
Sent: Friday, July 31, 2026 4:05 PM
To: CEQA, CountyParks
Subject: [External] Re: Alpine County Park Project - Recirculated Draft EIR for Public Review

I161-1 Keep up your push to put the new park there. The dissenters are a small group of NIMBY neighbors. The majority want/need that park. I overlook the site, but have no problems with it - but hopefully without night lighting!
JP Phelps

Sent from MailDroid

-----Original Message-----
From: "CEQA, CountyParks" <CountyParksCEQA@sdcounty.ca.gov>
To: "CEQA, CountyParks" <CountyParksCEQA@sdcounty.ca.gov>
Sent: Fri, 31 Jul 2026 1:04 PM
Subject: Alpine County Park Project - Recirculated Draft EIR for Public Review

Good afternoon,

The County of San Diego, Parks and Recreation Department is recirculating sections of the Draft Environmental Impact Report (EIR) for public review for the Alpine County Park Project pursuant to the California Environmental Quality Act. Please see attached for the Notice of Availability. The recirculated sections of the EIR along with supporting documents, together referred to as the 2026 Recirculated Draft EIR, can be accessed through the County Parks website by following this link: https://www.sdparks.org/content/sdparks/en/AboutUs/Plans/public-review-documents.html.

The public review period runs from today, July 31, 2026, through Monday, September 14, 2026. Written comments regarding the 2026 Recirculated Draft EIR must be received no later than **September 14, 2026 at 5:00 p.m.** Comments should be emailed to CountyParksCEQA@sdcounty.ca.gov.

Please let us know if you have any questions, thank you!

Megan Doran, Environmental Planner
Pronouns: (she/her)
Department of Parks and Recreation
County of San Diego, Land Use and Environment Group
C: 619-909-6309

SDParks.org | News Updates | Engage



Comment Letter I161 Response: Comment I161-1

I161-1 This comment expresses support for the project and does not address the adequacy of the environmental analysis in the 2026 Recirculated Draft EIR. No changes to the 2026 Recirculated Draft EIR are needed.

Comment Letter I162: Jordan Pursglove, September 14, 2026

Comment Letter I162

From: Jordan Pursglove
To: CEQA, CountyParks
Subject: [External] Alpine County Park Project - SCH#2021030196
Date: Monday, September 14, 2026 2:39:21 PM

Dear Megan Doran and County Parks Planning Team,

We are writing regarding the Alpine County Park Project – SCH#2021030196 and the 2026 Recirculated Draft EIR.

We want to emphasize that our property is literally adjacent to the proposed project site, off Boulder Oaks Lane. Our family lives directly next to Wright's Field, and we frequently enjoy this property because of its natural beauty, open space, and undeveloped character.

I162-1 Our biggest concern with this project is the overall scale of the proposed development and the impact it could have on the natural character of Wright's Field. Wright's Field is currently a beautiful piece of natural open space and a Backcountry Land Trust nature preserve. That is what makes it special to our family and, in our experience, to many people who live in Alpine.

We honestly do not know anyone in our community who is asking for a park of this scale at this location. We understand the desire to provide recreational opportunities, but we question whether turning this natural preserve into a significantly developed county park is what our community actually needs or wants.

We are pleased that the updated plan has removed some of the more intensive recreational elements, including the turf and BBQ areas. We strongly encourage the County to continue moving in that direction and consider a much more restrained approach that prioritizes preserving the natural environment rather than developing it.

We also strongly question the proposed 250 parking spaces. We would support reducing that number significantly. Two hundred and fifty spaces seems completely out of scale with the surrounding area and would inevitably bring additional traffic and activity onto roads that were not designed for it.

That leads to one of our greatest concerns: the safety of our children.

I162-2 Our children are young right now, so we are able to drive them where they need to go. But they will not always be little. We worry about the day when our children are old enough to ride their bikes or walk around our community independently. South Grade Road does not currently have the safe pedestrian and bicycle infrastructure we would want for our children, and increasing traffic and visitation to Wright's Field without addressing that issue first concerns us greatly.

If the County moves forward with increased public access, we believe there needs to be a safe, protected bicycle and pedestrian connection to and from the park, including an appropriate physical barrier from South Grade Road. We would much rather see our limited public resources invested in sidewalks and protected bike paths throughout Alpine that make it safer for our children and residents to get around town.

I162-3 Quite frankly, if the County has this level of funding available, we would rather see it invested in sidewalks, protected bike paths, and other infrastructure that our community actually needs

I162-3 cont. —or returned to taxpayers—than spent developing a natural preserve into a large-scale park that we do not believe our community is asking for.

Ultimately, we worry that in trying to create a larger recreational facility, we will lose the natural character that makes Wright's Field worth visiting in the first place. Wright's Field already provides something our community cannot easily replace: access to nature and open space.

I162-4 As property owners directly adjacent to Wright's Field, we respectfully ask the County to reconsider the scale of this project, reduce the proposed parking capacity, prioritize safe pedestrian and bicycle infrastructure, and place a much greater emphasis on preserving the natural character of the property.

Thank you for considering the perspective of residents who live directly alongside Wright's Field and who will live with the long-term consequences of this project.

Sincerely,

Jordan & Derrick Pursglove
Alpine Residents and Adjacent Property Owners

Comment Letter I162 Response: Comments I162-1 through I162-4

I162-1 The commenter expresses concern about impacts to Wright's Field and the size of the project. Refer to Section 4.4.4 of Volume 2, which concluded that all impacts to biological resources would be less than significant with mitigation incorporated. The commenter's preference for a reduced project is noted, but the 2026 Recirculated Draft EIR was required to address only the issues identified in the Superior Court's June 9, 2025 Minute Order and January 20, 2026 Writ of Mandate, which does not include the project's alternatives analysis, as described in MR-16 (Scope of the RDEIR). Also refer to MR-17 (Project Scope and Alternatives) regarding the project's size and design. Additionally, to clarify, the project still includes barbecues and turf areas. No changes to the 2026 Recirculated Draft EIR are needed.

I162-2 The commenter requests a reduced number of parking spaces and expresses concern about pedestrian and bicycle safety. Refer to MR-21 (Pedestrian and Bicyclist Safety); safety impacts to pedestrians and bicyclists would be less than significant. No changes to the 2026 Recirculated Draft EIR are needed.

I162-3 The commenter shares a preference for other County projects but does not address the adequacy of the environmental analysis in the 2026 Recirculated Draft EIR. No changes to the 2026 Recirculated Draft EIR are needed.

I162-4 This comment reiterates the requests in comments I161-1 through I162-3 above but does not address the adequacy of the environmental analysis in the 2026 Recirculated Draft EIR. Refer to responses I161-1 through I162-3 above. No changes to the 2026 Recirculated Draft EIR are needed.

Comment Letter I163: Denae Ranucci, September 14, 2026

Comment Letter I163

From: Denae Ranucci
To: CEQA, CountyParks
Subject: [External] Alpine County Park Project - SCH#2021030196
Date: Monday, September 14, 2026 4:01:52 PM

I163-1 Please note that I am OPPOSED to the proposed Alpine Park project due to issues of road safety, fire concerns, and the environmental fragility of the area.

Thank you,
-Denae Ranucci

Comment Letter I163 Response: Comment I163-1

I163-1 The commenter expresses opposition to the project due to road safety, fire concerns, and the environmental fragility of the area, but does not raise a specific issue with the analysis in the 2026 Recirculated Draft EIR. Refer to Section 4.17 and Section 4.20 of Volume 2, which concluded traffic and fire safety impacts would be less than significant without mitigation, and Section 4.4 of Volume 2, which concluded impacts to biological resources would be less than significant with mitigation incorporated. No changes to the 2026 Recirculated Draft EIR are needed.

Comment Letter I164: Sarah Reimund, July 31, 2026

Comment Letter I164

From: Sarah Reimund
Sent: Friday, July 31, 2026 2:18 PM
To: CEQA, CountyParks
Subject: [External] Comments on the 2026 Recirculated Draft EIR for the Alpine County Park Project (SCH #2021030196)

To Whom It May Concern,

I164-1 I am submitting these comments regarding the 2026 Recirculated Draft Environmental Impact Report for the Alpine County Park Project. I am a homeowner who lives immediately adjacent to the proposed park site. My backyard borders the road that will serve as the primary entrance and exit for the proposed park. Because of my property's location, my family will experience the impacts of this project every day. I appreciate the opportunity to comment and respectfully request that the County carefully consider the concerns of the residents who will be most directly affected.

I164-2 My primary concern is wildfire evacuation and the safety of my family.

Wildfire is a reality for those of us who live in Alpine. It is something we prepare for every year, and we understand that every minute matters during an evacuation. The roadway serving the proposed park is a two-lane road with limited options for entering and leaving the area. There is a traffic signal near Albertsons in one direction and a stop-controlled intersection in the other. Depending on the location and movement of a wildfire, residents may have only one safe direction available for evacuation.

The proposed park has the potential to bring hundreds of additional vehicles into this area. If a wildfire were to occur during a weekend, sporting event, or other period of peak park use, park visitors and residents could be attempting to leave at the same time while emergency responders are attempting to enter. I respectfully request that the County identify where the recirculated EIR analyzes this scenario and explain how it concluded that evacuation can occur safely under these conditions. If this scenario was not evaluated, I request that it be analyzed before any future project approvals are considered.

I also request that the County explain how emergency vehicles, including fire engines, ambulances, and law enforcement, will safely access the neighborhood while residents and park visitors are simultaneously evacuating. I could not determine from the recirculated EIR whether this situation was fully evaluated.

I164-3 My second concern is the direct impact on the families who already live next to the project.

My backyard is immediately adjacent to the road that will serve as the primary access route to the park. Unlike most residents in Alpine, my family will experience the increase in traffic, vehicle headlights, noise, and daily activity directly behind our home. This is not simply an inconvenience. It is a significant change to the safety and character of the neighborhood where my children live and play.

I am concerned about the increased potential for speeding, distracted driving, and the overall increase in vehicle traffic immediately adjacent to my property. As a parent, I worry about how I am expected to keep my children safe when the primary access road to a large community park is directly behind our backyard. I respectfully request that the County identify where the EIR evaluates these impacts on adjacent homeowners and explain why they were determined not to be significant.

I164-3 cont.

I am also extremely concerned about pedestrian and bicycle safety.

There are no sidewalks at all leading to the proposed park. There are no pedestrian pathways, no protected crossings, and no nearby bus stops providing convenient public transportation. Families and children who wish to visit the park would have to walk or ride bicycles along a two lane roadway that was not designed for heavy pedestrian use.

The proposed project is intended to serve families and children, yet there is no basic pedestrian infrastructure allowing them to safely reach the park. I respectfully request that the County identify where the EIR evaluates pedestrian and bicycle safety under these conditions and explain how visitors are expected to safely access the park without sidewalks or protected pedestrian facilities.

These concerns are not theoretical. A cyclist was tragically killed on the roadway near the proposed park entrance. Regardless of the circumstances of that collision, it demonstrates that this roadway already presents safety challenges for vulnerable road users. I respectfully request that the County explain what roadway improvements, if any, are proposed to improve safety for pedestrians and cyclists before the park is opened.

I am also concerned that the recirculated EIR does not clearly explain why this location was selected for a major community park when it lacks sidewalks, pedestrian infrastructure, and multiple evacuation routes. I respectfully request that the County identify where the EIR discusses alternative locations and explain why this site was determined to be the most appropriate despite these existing safety concerns.

I164-4

Finally, I ask the County to consider the residents who already call this neighborhood home. My family chose to live here because of the rural character of the community and because we believed it was a safe place to raise our children. I

I164-5

I164-5 cont. support parks and recreational opportunities for our community. However, I do not believe that providing those opportunities should come at the expense of the safety of the families who already live adjacent to the project.

I164-6 For these reasons, I respectfully request that the County fully address the following questions before considering certification of the recirculated EIR:

- Where does the EIR analyze wildfire evacuation if only one evacuation route is available?
- How does the EIR evaluate simultaneous evacuation of residents and park visitors during peak park occupancy?
- How will emergency responders safely enter the area while residents and visitors are evacuating?
- Where does the EIR evaluate the impacts on homeowners whose properties directly border the park access road?
- Where does the EIR evaluate pedestrian and bicycle safety when there are no sidewalks, pedestrian pathways, or nearby public transportation?
- What roadway improvements will be completed before the park opens to protect pedestrians, cyclists, children, and nearby residents?
- Where does the EIR explain why this location was selected over sites with safer transportation infrastructure and access?

I164-7 Thank you for considering my comments. Because my home is directly adjacent to the main road proposed entrance, the decisions made regarding this project will have a direct and lasting impact on my family's safety. I respectfully ask that these concerns be fully considered and addressed before any future action is taken on this project.

Sincerely,

Sarah Reimund

Comment Letter I164 Response: Comments I164-1 through I164-7

I164-1 This is an introductory comment that describes the commenter's relationship with the project site and introduces the concerns detailed in subsequent comments. Refer to responses I164-2 through I164-7 below.

I164-2 The commenter expresses concerns about emergency evacuation. Refer to MR-18 (Emergency Evacuation) regarding project impacts to emergency response and evacuation, which were not required to be analyzed in the 2026 Recirculated Draft EIR. Please also refer to MR-9 (Wildfire) in Volume 4 Chapter 3, *Response to Comments on the Draft EIR And Recirculated Draft EIR* for additional information on emergency evacuation. No changes to the 2026 Recirculated Draft EIR are needed.

I164-3 The commenter notes their proximity to the project and expresses concern about increased traffic and noise volumes and traffic safety, including potential safety impacts for pedestrians and bicyclists. Refer to MR-16 (Scope of the RDEIR) regarding traffic volumes and noise; these issues are beyond the scope of the 2026 Recirculated Draft EIR but would be less than significant, as described in Sections 4.17, *Transportation* and Circulation and 4.13, *Noise and Vibration* of Volume 2. Refer to MR-21 (Pedestrian and Bicyclist Safety); safety impacts to pedestrians and bicyclists as a result of the project would be less than significant. No changes to the 2026 Recirculated Draft EIR are needed.

I164-4 The commenter requests an explanation about the alternative project locations identified and why the proposed project location was selected. Refer to MR-17 (Project Scope and Alternatives) regarding the project's alternatives analysis, which is beyond the scope of the 2026 Recirculated Draft EIR, as discussed in MR-16 (Scope of the RDEIR).

I164-5 The commenter reiterates concerns about the safety impacts of the project. Refer to response I164-3 above.

I164-6 The commenter reiterates the evacuation, safety, and alternative location concerns raised in comments I164-2 through I164-4 above. Refer to MR-18 (Emergency Evacuation), MR-21 (Pedestrian and Bicyclist Safety), and MR-17 (Project Scope and Alternatives). Please also refer to MR-9 (Wildfire) in Volume 4 Chapter 3, *Response to Comments on the Draft EIR And Recirculated Draft EIR* for additional information on emergency evacuation.

I164-7 This is a closing comment that reiterates the commenter's opposition to the project but does not address the adequacy of the environmental analysis in the 2026 Recirculated Draft EIR. No changes to the 2026 Recirculated Draft EIR are needed.

Comment Letter I165: Janine Rivera, August 27, 2026

Comment Letter I165

From: Janine Rivera
To: CEQA, CountyParks
Subject: [External] Alpine Park Project
Date: Thursday, August 27, 2026 11:49:57 AM

Dear Ms. Doran,

I165-1 Thank you for the opportunity to comment on the Alpine Park Project's ("Project") Recirculated Draft Environmental Impact Report (DEIR).

I165-2 My name is Janine and I have lived in San Diego since birth and of those years 4 in Alpine. And what I know about our beautiful County is all of the Nature it offers from ocean to mountains. I also now that it is our job as humans and stewards of this planet to protect the environment, which includes animal species that play a vital role in the well being of us all. As a resident of Alpine I also understand the small town we live in and the flow of traffic we experience. I live off S. Grade which leads into the development I live in. And the I understand the windy road of S. Grade unlike visitors; they do not know the curve of the streets where to slow down for bicyclists and pedestrians. I do not see how building a large park at this site will do anything but make for less nature and more traffic leading to more potential accidents.

I165-3 I am also very concerned about the lack of wildfire safety in this proposed project. I live in a very high probability of wildfire zone with only one route out of my development that comes up right to the area of the proposed park. Per 4.20.2.1 Regional and Local Wildfire risk, In Southern California, over 95% of fires are started by people (County of San Diego 2010)". This is an alarming statistic especially since the proposed park would have open barbecue pits and potentially hundreds a visitors a day. What happens if someone tosses their lit cigarette into the brush? What happens if an ember from the barbecue finds its way into the surrounding brush? What happens is that a fire is set and will spread likely at a fast rate given the terrain of flatlands and Santa Ana winds we experience. What happens to me and my family? We are trapped in our home with a fire mere miles away.

I165-4 I am very concerned about the scale of this proposed park and its potential negative consequences for the residents of Alpine as well as the listed species whom call this land their home.
.
Thank you or taking your input into consideration. I would like to receive all notices relating to this project at janinerivera@gmail.com

Sincerely,
Janine Rivera

Comment Letter I165 Response: Comments I165-1 through I165-4

I165-1 This is an introductory comment that thanks the County for the opportunity to comment on the 2026 Recirculated Draft EIR. Refer to responses I165-2 through I165-4 below regarding specific comments.

I165-2 The commenter expresses concern about impacts to nature and traffic safety. Refer to Section 4.4.4 of Volume 2, which concluded that all impacts to biological resources would be less than significant with mitigation incorporated. Refer to MR-21 (Pedestrian and Bicyclist Safety); safety impacts to pedestrians and bicyclists would be less than significant. No changes to the 2026 Recirculated Draft EIR are needed.

I165-3 The comment expresses concern about wildfire ignition on the project site. Refer to MR-19 (Wildfire Ignition and Spread); the project would not exacerbate wildfire risk. No changes to the 2026 Recirculated Draft EIR are needed.

I165-4 This is a closing comment that reiterates the commenter's opposition to the project and requests to be notified of future updates. No changes to the 2026 Recirculated Draft EIR are needed.

Comment Letter I166: Jody Root, September 13, 2026

Comment Letter I166

From: Jody Root
To: CEQA, CountyParks
Subject: [External] Alpine Park Project (SCH No. 2021030196)
Date: Sunday, September 13, 2026 1:06:51 PM

Jody Root
6102 Japatul Vista Lane
Alpine, CA 91901

Megan Doran
Project Manager
Department of Parks and Recreation
5500 Overland Avenue, Suite 410,
San Diego, CA 92123

Dear Ms. Doran,

I166-1 Thank you for the opportunity to comment on the Alpine Park Project's ("Project") Recirculated Draft Environmental Impact Report (DEIR). I am an Alpine resident for over 40 years and have followed and commented on the Project since its inception. I am limiting my comments to the Biological Resource, Transportation, and Wildfire issues raised by the Court.

I166-2 Biological Resource issues: I am not an expert with these issues, but I am curious why the County, and its consultants, are recommending mitigation on the spadefoot toad and pallid bat. Previously, in other efforts to develop Wright's Field, including the location of the Project, those projects were not approved because they would pose a significant impact on biological resources on the site that are not mitigatable. There is no discussion about what has changed.

I166-3 Wildfire issues: The Project will increase the use of the site. Alpine has been classified by many of the insurance companies as a fire risk and have not afforded residents the opportunity to get insurance. Section 4.20.6.1 indicates that there will be no smoking and open flames on the site. Yet in the same section it sites a County Code that allows the use of barbeques unless there's a Red Flag Warning. Not sure what rule is accurate but the use of barbeques in the Project under any weather increases the risk of fire

I166-4 Transportation issues: In Section 4.17.4.3, pg., 4-17-16 provides "Thus, no pedestrian or bicycle safety hazards have been identified associated with the project and impacts related to pedestrian and bicycle safety would be less than significant with no mitigation required." Wright's Field and the Project site are presently not usually used by bicyclists. You rarely see cyclists using the trails, or on South Grade. With the Project having two bike areas that will undoubtedly increase bike traffic on South Grade. Presently there if no designated bike lane, just signs allowing bikes to use the main road. This increase in use is definitely an impact that needs to be addressed.

I166-5 I am not in favor of this Project as presently planned. If it continues to be pursued, then I would like the issues I raised addressed. Thank you for taking my input. Please provide me with all notices on the Project at jody.root@yahoo.com.

Sincerely

/S/
Jody Root

Comment Letter I166 Response: Comments I166-1 through I166-5

I166-1 This is an introductory comment that describes the commenter's relationship with the community and introduces the concerns detailed in subsequent comments. Refer to responses I166-2 through I166-5 below.

I166-2 The commenter asks why the project includes mitigation for western spadefoot and pallid bat and mentions a past project on the project site. It is not clear which past project the commenter refers to, so no response can be provided. The project's Biological Resources Report in Appendix D2 and Section 4.4 of Volume 2 of this Final EIR describe the analysis conducted for the project site; biological surveys and project information indicated that potential impacts to western spadefoot and pallid bat could occur through project implementation, but mitigation measures were identified to reduce the impact to a less than significant level.

I166-3 The commenter expresses confusion about how the required human activity fire prevention measures in Section 4.20.6.1 of Volume 2 can simultaneously prevent open flames and allow barbecues unless there is a Red Flag Warning. To clarify, the County has discretion to decide which parks may have campfires and barbecues. A barbecue has a contained flame, which differs from an open flame associated with a campfire. The prohibition of campfires and open flames is an additional fire prevention measure that is proposed for the project. The use of barbecues in a County Park is an allowable use, except for when a Red Flag Warning has been issued (County Code of Regulatory Ordinances Section 41.118). When a warning is issued, Region Managers reach out to field staff and begin the process of shutting down all barbecues by placing signs at park entrances and throughout the park, banning barbecue use and covering all barbecues to ensure they are not used until the warning is lifted. Park staff patrol the park to enforce the ban while additional signage will be posted at park entrances and throughout the park.

I166-4 The commenter expresses concerns about bicyclist safety due to the potential increase in bicycle users along South Grade Road with the project. Refer to MR-21 (Pedestrian and Bicyclist Safety); safety impacts to pedestrians and bicyclists would be less than significant. No changes to the 2026 Recirculated Draft EIR are needed.

I166-5 This is a closing comment that reiterates the commenter's opposition to the project and requests to be notified of future updates. No changes to the 2026 Recirculated Draft EIR are needed.

Comment Letter I167: Louis Russo, September 4, 2026

Comment Letter I167

From: Louis Russo
To: CEQA_CountyParks
Subject: [External] Alpine Park Comment Letter
Date: Friday, September 4, 2026 3:55:58 AM

I wish to provide unqualified support for the Alpine Park.

I was on the Alpine Community Planning Group for a decade and consistently heard two things, the request from constituents for a park and the false declaration from a number of group members that there was no land in Alpine for a park. I sat and listened as every alternative was shot down for various reasons.

I167-1

I was the person who recommended Wright's to the County after it became clear that self interested parties on the ACPG never would. In other words, Wright's was always available. The fact is, it is in the perfect location and the only problem I have with the County's plan is that it is too small. I understand the County has done the best to accommodate all to the maximum extent possible.

Those opposed to this park are so for very personal reasons and have put forth every red herring they could. The fact is, they are red herrings.

Our citizens deserve this park, especially our children. Please go forward and complete the project.

Thank you,

Louis Russo

Comment Letter I167 Response: Comment I167-1

I167-1 This comment expresses support for the project and does not address the adequacy of the environmental analysis in the 2026 Recirculated Draft EIR. No changes to the 2026 Recirculated Draft EIR are needed.

Comment Letter I168: Mary Smith, September 14, 2026

Comment Letter I168

From: jpipe1@sbcglobal.net
To: CEQA_CountyParks
Subject: [External] ATTN. Megan Doran Re: Proposed Alpine Park
Date: Monday, September 14, 2026 1:49:33 PM

Attention: Megan Doran
Re: Proposed Alpine Park

Once again the Community of Alpine -
DO NOT WANT A HIGH- IMPACT SPORTS PARK COMPLEX!
ALPINE IS THE GATEWAY TO THE CLEVELAND NATIONAL FOREST!

I168-1 Arguments against the proposed high-impact sports park complex focus on its misalignment with Alpine's rural character, environmental risks, and public safety concerns. Residents have argued that the site should be a passive natural park rather than a regional sports destination.

Key arguments include:

I168-2 - Environmental Impact: There are significant concerns regarding water supply during severe droughts and the use of artificial turf, which would replace natural grasslands and native shrubs that feed local wildlife.

I168-3 - Public Safety & Wildfire: Fire danger is a primary priority, as residents are concerned about evacuating an established neighborhood when up to 1,000 visitors are gathered at the complex.

I168-4 - Traffic & Infrastructure: South Grade Road is a two-lane interior road that cannot be expanded; the addition of 300 parking spaces is expected to create dangerous traffic congestion near schools and residential areas.

I168-5 - Pollution: The project is expected to introduce noise and air pollution into a quiet community valued for its fresh air.

I168-6 - Lack of Local Benefit: Critics argue the park is designed for a regional audience rather than local residents, suggesting funds should instead be used to repair existing parks.

I168-7 A 2026 judgment in the Superior Court of California confirmed several of these concerns, ruling that the Environmental Impact Report (EIR) failed to adequately analyze impacts related to wildfire, vehicle traffic public safety, and protected species such as the western spadefoot toad and pallid bat.

Respectfully submitted,
Mary A. Smith, Resident of Alpine

Comment Letter I168 Response: Comments I168-1 through I168-7

I168-1 This is an introductory comment that expresses opposition to the project and introduces the concerns detailed in subsequent comments. Refer to responses I168-2 through I168-7 below. The comment also indicates that residents would prefer a more passive park. This preference is noted, but the 2026 Recirculated Draft EIR was required to address only the issues identified in the Superior Court's June 9, 2025 Minute Order and January 20, 2026 Writ of Mandate, which does not include the project's alternatives analysis, as described in MR-16 (Scope of the RDEIR). Refer to MR-17 (Project Scope and Alternatives) regarding the project's design. No changes to the 2026 Recirculated Draft EIR are needed.

I168-2 The commenter expresses concerns about water supply and the use of artificial turf. Refer to MR-16 (Scope of the RDEIR); these issues were not required to be analyzed in the 2026 Recirculated Draft EIR. No changes to the 2026 Recirculated Draft EIR are needed.

I168-3 The commenter expresses concern about emergency evacuation. Refer to MR-18 (Emergency Evacuation) regarding project impacts to emergency response and evacuation, which were not required to be analyzed in the 2026 Recirculated Draft EIR. Please also refer to MR-9 (Wildfire) in Volume 4 Chapter 3, *Response to Comments on the Draft EIR And Recirculated Draft EIR* for additional information on emergency evacuation. No changes to the 2026 Recirculated Draft EIR are needed.

I168-4 The commenter asserts that the project would result in dangerous traffic congestion near schools and residential areas. Refer to MR-16 (Scope of the RDEIR); traffic congestion was not analyzed in the 2026 Recirculated Draft EIR. However, roadway hazards were analyzed in the 2026 Recirculated Draft EIR. Refer to MR-21 (Pedestrian and Bicyclist Safety); safety impacts to pedestrians and bicyclists would be less than significant. Additionally, the project proposes up to 240 parking spaces, not 300 as suggested by the commenter. No changes to the 2026 Recirculated Draft EIR are needed.

I168-5 The commenter expresses concerns about noise and air pollution. Refer to MR-16 (Scope of the RDEIR); these issues were not required to be analyzed in the 2026 Recirculated Draft EIR. No changes to the 2026 Recirculated Draft EIR are needed.

I168-6 This comment expresses an opinion about the intentions behind the project but does not address the adequacy of the environmental analysis in the 2026 Recirculated Draft EIR. No changes to the 2026 Recirculated Draft EIR are needed.

I168-7 This comment summarizes the history of the project but does not address the adequacy of the environmental analysis in the 2026 Recirculated Draft EIR. No changes to the 2026 Recirculated Draft EIR are needed.

Comment Letter I169: Ron Smith, September 14, 2026

Comment Letter I169

From: Mary Smith
To: CEQA_CountyParks
Subject: [External] Re: Proposed Alpine Park ATTN. Megan Doran
Date: Monday, September 14, 2026 1:55:07 PM

Ms. Doran

I169-1

I am a long time resident of Alpine and am very concerned about the environment impact that the over sized proposed park would have on our community.

Transportation sec. 4.17, did the DEIR adequately address the increased traffic congestion? Not to mention the carbon emissions that will be generated by people driving too and from a remote park in Alpine?

Biological resources sec. 4.4, Wrightfield is an extremely environmentally sensitive area. Did the DEIR adequately address this issue?

Ron Smith
Alpine Ca. 91901

Sent from the all new AOL app for iOS

Comment Letter I169 Response: Comment I169-1

I169-1 The commenter asks if the 2026 Recirculated Draft EIR adequately addressed traffic congestion, carbon emissions, and biological resources. Refer to MR-16 (Scope of the RDEIR); traffic congestion and carbon emissions were not required to be analyzed in the 2026 Recirculated Draft EIR. Potential impacts to biological resources were adequately addressed in Section 4.4 of the 2026 Recirculated Draft EIR, which concluded that all potential impacts would be reduced to a less than significant level with mitigation. No changes to the 2026 Recirculated Draft EIR are needed.

Comment Letter I170: Jillian Spady, September 14, 2026

Comment Letter I170

From: Jillian Spady
To: CEQA, CountyParks
Subject: [External] Alpine County Park Project - SCH#2021030196
Date: Monday, September 14, 2026 11:49:35 AM

Hi Megan,

I170-1 We strongly oppose the proposed Alpine County Park Project in its current form.

My family lives in Alpine because of its rural character, open space, wildlife, and lower-density way of life. A large active-use park of this scale is simply not appropriate for this location.

I170-2 I am particularly concerned about increased traffic and the effect it could have on public safety and emergency evacuation. Alpine is already an extremely fire-prone community, and adding a major destination that brings additional vehicles into the area creates very real concerns during a wildfire or other emergency.

I170-3 I am also concerned about the impact of this level of development and activity on the surrounding habitat and wildlife, particularly given the park's location directly adjacent to Wright's Field Preserve.

I170-4 I support parks, trails, and outdoor recreation, but this project is far too intensive for this location. I strongly urge the County to reconsider the scale and active uses proposed and instead prioritize preservation of the land, wildlife habitat, and rural character of Alpine.

Thank you for your consideration!

Sent from my iPhone

Comment Letter I170 Response: Comments I170-1 through I170-4

I170-1 This comment expresses opposition to the project and states it is incompatible with the character of the area. Refer to MR-16 (Scope of the RDEIR); community character was not required to be analyzed in the 2026 Recirculated Draft EIR. Refer to the comments below regarding specific comments on the 2026 Recirculated Draft EIR.

I170-2 The commenter expresses concern about emergency evacuation. Refer to MR-18 (Emergency Evacuation) regarding project impacts to emergency response and evacuation, which were not required to be analyzed in the 2026 Recirculated Draft EIR. Please also refer to MR-9 (Wildfire) in Volume 4 Chapter 3, *Response to Comments on the Draft EIR And Recirculated Draft EIR* for additional information on emergency evacuation. No changes to the 2026 Recirculated Draft EIR are needed.

I170-3 The commenter expresses concern about impacts to habitat and wildlife. Refer to Section 4.4.4 of Volume 2, which concluded that all impacts to biological resources would be less than significant with mitigation incorporated. No changes to the 2026 Recirculated Draft EIR are needed.

I170-4 This comment reiterates opposition to the project and suggests the County reconsider the scale and uses on site. This preference is noted, but the 2026 Recirculated Draft EIR was required to address only the issues identified in the Superior Court's June 9, 2025 Minute Order and January 20, 2026 Writ of Mandate, which does not include the project's alternatives analysis, as described in MR-16 (Scope of the RDEIR). Refer to MR-17 (Project Scope and Alternatives) regarding the project's design. As described in responses I170-1 through I170-3 above, no changes to the 2026 Recirculated Draft EIR are needed.

Comment Letter I171: Allen Stanko, September 12, 2026

Comment Letter I171

From: Allen Stanko
To: CEQA_CountyParks
Subject: [External] Alpine County Park Project
Date: Saturday, September 12, 2026 12:07:29 PM

To Whom It May Concern:

I171-1

It does not matter much what the negative comments are about the "proposed" county park for Alpine, "they" are going to do whatever they want. We the People in Alpine are not as intelligent and informed as the people making the decisions. And I don't care if Joel Anderson lives in Alpine, he is from another class as most residents of Alpine. We, the people of Alpine, do NOT want or need another park. I was at a meeting the other day at the Alpine Community Center, in which maybe 30 to 40 people attended, and I asked the question, "How many here support the proposed park in Alpine?". Only 2 or 3 people raised their hand. Our government has enough money, take a survey of ALL the residents of Alpine and I think you will find that most people are against it. But, then again, what does that mean to you ? Nothing. Because you obviously know better than we do.
Bottom line...I vote NO on the project, and I have been a resident of Alpine for almost 40 years.
Sincerely,

Allen Stanko
P.O. Box 821
Alpine 91903
619-456-7584

Comment Letter I171 Response: Comment I171-1

I171-1 This comment expresses opposition to the project but does not address the adequacy of the environmental analysis in the 2026 Recirculated Draft EIR. No changes to the 2026 Recirculated Draft EIR are needed.

Comment Letter I172: Nick Todaro, August 21, 2026

Comment Letter I172

From: Nick and Kate Todaro
To: CEQA_CountyParks
Subject: [External] Public Comment in Support - Alpine County Park Project (SCH#2021030196)
Date: Friday, August 21, 2026 10:22:52 AM

Ms. Megan Doran
Project Manager, County of San Diego
Department of Parks and Recreation
5510 Overland Avenue, Suite 270
San Diego, CA 92123
CountyParksCEQA@sdcounty.ca.gov

Re: Comments on the 2026 Recirculated Draft EIR, Alpine County Park Project (SCH#2021030196)

Dear Ms. Doran,

I172-1

I am a resident of Alpine writing in strong support of the Alpine County Park Project and in support of certification of the 2026 Recirculated Draft EIR. I have reviewed the recirculated sections and the Reader's Guide, and I want to put my support on the record before the September 14 deadline.

Alpine has waited more than two decades for a community park. Our children currently travel to Lakeside, Santee, or El Cajon for organized sports and basic recreation facilities, which puts additional vehicle trips on I-8 and Tavern Road every week. A 25-acre active park with multi-use turf, a baseball field, courts, a leash-free dog area, and a nature play area, paired with roughly 70 acres of preserved and restored open space, is exactly the kind of project this community has asked for through years of public input.

On the recirculated sections specifically:

Section 4.20 Wildfire and Appendix J1. As someone who lives in this fire environment and has evacuated before, I find the updated fire protection analysis responsive to the Court's concerns. A developed and irrigated 25-acre park with maintained defensible space and improved road access does not increase wildfire risk relative to the parcel's current unmanaged condition. The presence of an on-site ranger station adds a staffed set of eyes on a property that today has none.

Section 4.17 Transportation and Circulation and Appendix I1. The revised traffic study addresses vehicle safety at the South Grade Road and Tavern Road access points. I support the identified improvements and encourage the County to implement them early in construction rather than at the end of the project, so the safety benefit is realized as soon as the park opens.

Section 4.4 Biological Resources and Appendix D2. The updated analysis of the western spadefoot toad and pallid bat, together with the mitigation framework, appears adequate. The project also permanently protects and funds restoration of approximately 70 acres adjacent to Wright's Field. Without this project, that acreage has no dedicated management or funding source. The environmentally superior outcome here is the project as proposed, not the no-project alternative.

I172-1 cont.

Section 4.9 Hazards and Hazardous Materials. I have reviewed this section and have no objection to the revised analysis or the associated mitigation.

I recognize that the County's obligation under CEQA is to disclose and mitigate impacts, and my reading is that the recirculated sections do that. I respectfully ask that the Board of Supervisors certify the Final EIR and re-approve the project so construction can move forward without further delay.

Thank you for the opportunity to comment.

Respectfully,

Nick Todaro
1850 Rancho Janet
Alpine, CA 91901
619-987-5418
ntodaro4@gmail.com

Comment Letter I172 Response: Comment I172-1

I172-1 This comment expresses support for the project and positively acknowledges the specific revisions made in response to the Superior Court's June 9, 2025 Minute Order and January 20, 2026 Writ of Mandate. No changes to the 2026 Recirculated Draft EIR are needed.

Comment Letter I173: Patrick Williams, September 14, 2026

Comment Letter I173

From: Patrick Williams
To: CEQA_CountyParks; Dominique Norton; James Mason; Jon Green; Duncan McFetridge
Subject: [External] Alpine County Park Project - SCH#2021030196
Date: Monday, September 14, 2026 4:14:04 PM
Attachments: Pat Williams. Alpine County Park. 2026.docx

Dear Staff,

I173-1 I am attaching my comments on the proposed Alpine County Park.

Please contact me with any public updates to the CEQA project review.

Thanks very much,

Regards,

Pat Williams

September 14, 2026
Megan Doran, Project Manager
County of San Diego, Department of Parks and Recreation
5510 Overland Avenue, Suite 270
San Diego, CA 92123

Re Alpine County Park Project - SCH#2021030196

Dear Ms. Doran:

I173-2

For decades, the Alpine community has been represented at the County level by the Alpine Community Planning Group (ACPG). This group has consistently favored intensive residential development of the Alpine Planning Area. While this is not unusual or inappropriate at many levels, it raises due process concerns when planning outcomes favor holders of undeveloped Alpine real estate.

The sale of the eastern portion of Wright's Field to the County for $1.37M by a Texas LLC group that formed to pass through the sale of the property should be examined. The $14k/acre purchase price for 98 acres of undeveloped SR-2 property appears to have been an incredible bargain. It could have included an implied agreement to build a large county park on the land. Larger SR-2 properties in Alpine are valued from $18,000 for steeply sloping properties to $250,000/acre for land with permitted parcels. The 98-acre Wright's Field property was offered to BCLT by the "Apollo Group" – long-time owner of the land- at a far greater price. The appraisal tied to the County's 2019 purchase was performed internally by the County, and no "arm's length" appraisal has been cited for the transaction.

The County's push to develop a 25-acre "sports complex" on natural habitat the county had previously resolved "could not be mitigated" has led town residents to suspect that County and local development interests influenced placement of a "magnet park" on top of the town's most popular natural attraction to attract sports-minded families to move to Alpine.

I served on the Back Country Land Trust board from 2014 to 2021. I was asked to resign from the board because I opposed putting a sports complex on Wright's Field. In discussions about the park project at a BCLT board meeting, George Barnett (long-time president and treasurer of BCLT and long-time member of the ACPG) told me the park was a "*done-deal*" as proposed, and that "*nothing could stop it.*" On hearing this, I resolved that "*Alpine can be better than this,*" and began advocating for family-centered amenities and a passive use of the newly acquired County property.

During review of the park at five outreach meetings required for Regional Park Program (RPP) funding, ~70% of respondents favored a passive-use park for the site. Newspaper and online polling duplicated this result. Determination to build this park flies in the face of extreme fire danger and the existing residential evacuation hazards that have been evaluated by the County's own fire consultant to likely be the "worst in San Diego County". (Rhodes Associates, v2., 2020, p.7).

I173-2 cont.

The project plan blocks walkable access to Wright's Field and will restrict access to park hours. Generations of Alpine families have come to the immediate project footprint for remembrance photos, which speaks to how special this place is. I urge the Supervisors to visit the site before voting on this park proposal. The park viewshed is unmatched in the Alpine planning area, with expansive views to the Pacific Ocean. It would be misguided to place a magnet sports park atop one of San Diego's, and certainly Alpine's most beautiful places.
Thank you for taking the time to read my personal perspective on the proposed Alpine County Park.

Kind regards,

Patrick Williams Ph.D.
Environmental and Hazard Geology
Alpine California

Comment Letter I173 Response: Comments I173-1 through I173-2

I173-1 This comment introduces the comment letter and does not address the adequacy of the 2026 Recirculated Draft EIR. Refer to response I173-2 below regarding specific comments submitted on the 2026 Recirculated Draft EIR.

I173-2 The commenter details their personal history with the project site and expresses concerns related to natural habitat, fire danger and evacuation, and the project site's viewshed. Thresholds 2 and 3 in Section 4.4.4 of Volume 2 analyze impacts to sensitive natural communities and wetlands. As discussed in Section 4.4.4 of Volume 2, the project would be required to implement compensatory habitat-based mitigation and restoration to reduce potential impacts to sensitive vegetation communities to a less than significant level. All potential impacts to biological resources would be mitigated to a less than significant level.

Refer to MR-18 (Emergency Evacuation) regarding project impacts to emergency response and evacuation, which were not required to be analyzed in the 2026 Recirculated Draft EIR. Also refer to MR-19 (Wildfire Ignition and Spread); the project would not exacerbate wildfire risk. Please also refer to MR-9 (Wildfire) in Volume 4 Chapter 3, *Response to Comments on the Draft EIR And Recirculated Draft EIR* for additional information on emergency evacuation. Additionally, as described in MR-23 (Wright's Field Parking), the project would not restrict access to Wright's Field.

Refer to MR-16 (Scope of the RDEIR); aesthetics impacts were not required to be analyzed in the 2026 Recirculated Draft EIR. No changes to the 2026 Recirculated Draft EIR are needed.

Comment Letter I174: Karen Wood, September 14, 2026

From: Karen W
To: CEQA_CountyParks
Subject: [External] Alpine County Park Project - SCH#2021030196
Date: Monday, September 14, 2026 3:52:31 PM

Comment Letter I174

Attn: Megan Doran

Dear Ms. Doran,

I174-1 I am writing as a resident to submit official public comments regarding the Draft Environmental Impact Report (EIR) for the proposed community park project. While I am supportive of providing recreational spaces for our neighborhood, I have strong concerns regarding the proposed vehicle infrastructure and pedestrian safety surrounding the site.

Specifically, I urge the County to revise the current plan to address the following two issues:

I174-2
- **Reduction of Vehicle Parking Capacity:** The current EIR allocates an excessive amount of space to vehicle parking. For a small community like ours, overbuilding parking creates an excessive footprint of impermeable surfaces and degrades the rural character of our neighborhood. I recommend reducing the total number of parking spaces to match actual local demand better, prioritizing a smaller footprint that preserves natural green space. I would estimate that 120 spaces would be more than adequate.

I174-3
- **Pedestrian Safety Infrastructure on South Grade Road:** The EIR does not adequately mitigate the significant traffic safety risks for residents accessing the park on foot. South Grade Road is a heavily trafficked roadway, and the park will naturally attract pedestrians, including families and children. I request that the final EIR incorporate enforceable mitigation measures for a safe, designated pedestrian crossing (such as a high-visibility crosswalk, pedestrian-activated flashing beacons, or traffic-calming measures) across South Grade Road to ensure community members can safely access the park.

I174-4 Thank you for your time, consideration, and dedication to keeping our community safe and sustainable. I look forward to seeing these essential revisions reflected in the Final EIR.

Sincerely,

Karen Wood

Alpine Resident

Comment Letter I174 Response: Comments I174-1 through I174-4

I174-1 This comment introduces the concerns specified in later comments. Refer to response I174-2 through I174-4 below.

I174-2 The commenter requests a reduced vehicle parking capacity, which is beyond the scope of the 2026 Recirculated Draft EIR, as described in MR-16 (Scope of the RDEIR). Also refer to MR-17 (Project Scope and Alternatives) regarding the project's design. No changes to the 2026 Recirculated Draft EIR are needed.

I174-3 The commenter expresses concerns about pedestrian safety and recommends specific improvements. Refer to MR-21 (Pedestrian and Bicyclist Safety); safety impacts to pedestrians and bicyclists would be less than significant. Attachment D of Appendix I1 describes the additional improvements considered and why they were not incorporated into the project at this time; for example, traffic signal warrants are based on field-observed operating conditions such as vehicular volumes and peak-hour delay, which cannot be definitively measured prior to project construction. County of San Diego Department of Public Works (DPW) would continue to regularly analyze traffic incidents, reports, and violations to assess the conditions and would recommend improvements if deemed necessary. Anyone wishing to file a concern or complaint may contact the Transportation Division's front desk at 858-694-3850. Concerns or complaints related to County Maintained Roads can also be submitted through the 'Tell Us Now' mobile app available for download in either the Google Play Store or Apple App Store. Additionally, road concerns can be reported by filling out and submitting a Road Service Request Form, available at: https://www.sandiegocounty.gov/content/sdc/dpw/roads/Roads_Service_Request.html. No changes to the 2026 Recirculated Draft EIR are needed.

I174-4 This is a closing comment that thanks the County for the opportunity to comment but does not address the adequacy of the 2026 Recirculated Draft EIR. No changes to the 2026 Recirculated Draft EIR are needed.

Comment Letter I175: Tina Woolley, September 14, 2026

Comment Letter I175

From: tina woolley
To: CEQA, CountyParks
Subject: [External] County Park Alpine
Date: Monday, September 14, 2026 3:01:50 PM

To : Megan Doran , project manager

I175-1 Thank you for the opportunity to respond to the revised draft . I did attend the local meeting at the Alpine Community Center and had questions that still have not been addressed. Looking back into archives regarding this property, the County took a stance in The 1990's that stated the areas of concern could not be mitigated. Yet here we are many years later trying to mitigate them. I asked in the meeting ,to what Elevation do you plan to raise the park ?

I175-2 If we are trying to protect a historic grassland that is one of the last native in California, why would it be graded and filled? How do you plan to save the vernal pools and specific ecosystems native to that habitat? Are there not specific ecosystems that could take not only decades but centuries to recover? If at all? How many Englemen oaks do you preserve in this build out. There remains a historic stage route through this planned area . There are species on the list and proposed as endangered , and I do not see these addressed. It would be wonderful to have answers as promised in the meeting.

I175-3 Concerns for equine riders living nearby not having to necessarily trailer into the park . It is not required now and should be easily accessible. How is the equine loading and unloading area protected from others using that as overflow parking.

I175-4 Is the perk testing completed for the change in The restroom facilities now not being on sewer? As in the past that property did not perk.

I175-5 Has it ever been considered to leave this land and its cultural , historical, specific and rare ecosystems as they are? Have you considered anything close to the Park at Cowles Mtn., or Mission Trails? It is well documented in earlier public articles that the county considered this property as unmitigateable. I believe it to still hold true and if not what has changed the county stance on it. In my humble opinion your revised draft does not fulfill the requirements to build the park as you envision. I would urge the county to take another look at a park similar to those I noted above. Visitors would benefit from a natural park without most of the man made development. Please reconsider . The majority of the community does not support this park . Those that live here and our voices should matter.

Respectfully, Tina Woolley
Sent from my iPhone

Comment Letter I175 Response: Comments I175-1 through I175-5

I175-1 The commenter mentions a past project on the project site and asks about the proposed elevation for the park. It is not clear which past project the commenter refers to, so no response can be provided. As described in Section 4.5.2 of Volume 2, the project is located at elevations ranging from approximately 1,886 to 2,054 feet above mean sea level. The project does not propose raising the park and will be using existing elevations as much as possible.

I175-2 The commenter asks about impacts to grassland, vernal pools, native habitats, Engelmann oaks, endangered species, and historic resources. Refer to MR-16 (Scope of the RDEIR); biological topics unrelated to the western spadefoot and pallid bat analyses described in the Writ are beyond the scope of the 2026 Recirculated Draft EIR, as are historic resources, such as the historic stage route mentioned in this comment. Regardless, these resources are described in Section 4.4 of Volume 2. Impacts to special-status species are analyzed under Threshold 1 of Section 4.4.4.3 in Volume 2, which concluded that impacts would be less than significant with mitigation. Impacts to native habitats, grassland, and Engelmann oak woodlands are analyzed under Threshold 2 of Section 4.4.4.3 in Volume 2, which concluded that impacts would be less than significant with mitigation. Impacts to vernal pools are analyzed under Threshold 3 of Section 4.4.4.3 in Volume 2, which concluded that impacts would be less than significant. As described under Threshold 1 of Section 4.5.4.3 in Volume 2, the project would not result in a substantial adverse change in the significance of a historical or archaeological resource. No changes to the 2026 Recirculated Draft EIR are needed.

I175-3 This comment does not address the adequacy of the 2026 Recirculated Draft EIR. The commenter asks about the logistics of parking trailers on the project site. Refer to MR-16 (Scope of the RDEIR); while this topic is beyond the scope of the 2026 Recirculated EIR, the following discussion is provided as a courtesy to the commenter. Equestrian demand will vary depending on the number of riders using the park and whether they arrive with trailers. The project provides dedicated equestrian staging and trailer parking as part of the site plan. The purpose of those spaces is to serve equestrian users, and their use will be guided through final design and park operations using measures such as signage and parking restrictions. The driveway analysis in Appendix I1 also considers the operating characteristics of vehicles towing trailers as part of the sight-distance evaluation. Accordingly, the remaining issue is how the dedicated equestrian area will be managed during operation, not whether the project has an unaddressed parking overflow condition. County DPR intends to designate specific areas within the park for equestrian staging, including horse trailer parking and areas for loading, unloading, and preparing horses for trail use. Visitors would be notified through clearly posted signage at the park entrance and designated equestrian areas identifying parking restrictions and permitted uses. County DPR staff and the on-site volunteer would monitor these areas during routine park operations to help ensure they remain available for equestrian use.

I175-4 The commenter inquires about the use of a septic system on the project site. Refer to MR-16 (Scope of the RDEIR); this issue was not required to be analyzed in the 2026 Recirculated Draft EIR. No changes to the 2026 Recirculated Draft EIR are needed.

I175-5 The commenter states they prefer a passive park alternative for the project. This preference is noted, but the 2026 Recirculated Draft EIR was required to address only the issues identified in the Superior Court's June 9, 2025 Minute Order and January 20, 2026 Writ of Mandate, which does not include the project's alternatives analysis, as described in MR-16 (Scope of the RDEIR). Refer to MR-17 (Project Scope and Alternatives) regarding the project's design. No changes to the 2026 Recirculated Draft EIR are needed.